

# **Data Privacy Framework Services Program Annual Report**

Insights Association Data Privacy Framework (DPF) Services Program covering the period July 17, 2024, through July 16, 2025.

### **Executive Summary**

The Insights Association represents companies, corporate research and analytics departments, and individuals working in marketing research and data analytics. The Insights Association was founded in 2017 with the merger of CASRO, the US trade association founded in 1975, and MRA, the US professional society founded in 1957.

The Insights Association has been committed to supporting member companies' self-certification to the EU-US DPF, the UK Extension to the EU-US DPF and Swiss-US DPF. The Association offered this support through the Insights Association DPF Services Program beginning July 17, 2023. With a transition from Privacy Shield to the new Data Privacy Framework that coincided with the go-live date of July 17, 2023, previously enrolled Privacy Shield companies began transitioning to the new framework requirements on that same day. The IA website reflects the new program name and requirements for participation. Details about our program can be found on our website <a href="https://www.insightsassociation.org/Resources/Data-Privacy-Framework">https://www.insightsassociation.org/Resources/Data-Privacy-Framework</a>.

The Insights Association provided its previous Privacy Shield program to its company members beginning April 14, 2017. Upon the revision of the program, the association has provided Data Privacy Framework services since July 17, 2023. This report covers the period of July 17, 2024, through July 16, 2025.

The Recourse, Enforcement and Liability Principle of the DPF requires self-certifying organizations to provide an independent recourse mechanism (IRM) available to investigate unresolved complaints at no cost to the individual. Through the Insights Association DPF Services Program, as under its previous Privacy Shield program, member companies engage IRM services provided by the International Centre for Dispute resolution (ICDR). These IRM services are available at no cost to individuals.

#### <u>Program Requirements and related compliance activities</u>

The Insights Association DPF Services Program is a benefit of organizational membership and requires an Annual Participant Agreement. 2025 continues that participation from those companies renewing their annual program enrollment since the 2024 report. Renewal continue to comprise the largest portion of the program participants with only one new participant as of the date of this report. The Insights Association currently has 36 market research companies as approved participants, with 16 of those being renewals beginning in January 2025, utilizing the dispute resolution service offered as a component of the program. The Insights Association offers DPF-related online guidance for businesses and consumers regarding enrollment, as the IA DPF Services Program is a benefit of IA company membership.

While the Insights Association did not perform DPF-related <u>verification services</u> as described on the DPF website during the period of this report, that process continues in the early stages of the IA DPF Services Program, as the program is a self-certification and the participant organization is responsible for the attestations made in their privacy policy. As the IRM, the Insights Association DPF Services Program Manager and General Counsel of the association help within that framework to ease questions and concerns that arise during the self-certification application and approval process, and will likely not perform any DPF verification services.

Current participants in the program have continued to present or promote their self-certification to the DPF on their websites or other marketing communication channels during the period of this report. The Insights Association does not moderate a participating company's marketing/promotion of the program since the DPF – is a self-certification of participating organizations. However, the topic does arise in *ISO/IEC 27001:2022 Information Security Management System – Requirements* audits performed by IA's certification body, Certification Institute for Research Quality (CIRQ),

pertaining to other regulations or legislation the company adheres or certifies to as it strengthens its data protection initiatives.

Insights Association assists its participating organizations with their DPF compliance activities including reviewing and distribution of the DPF checklist. The association also provides access to its General Counsel if requested by a member organization, in cases where members do not have legal representation of their own. This service is a benefit of membership to the association.

#### Filing a Complaint

To file a complaint with the registered IRM, Insights Association, the complaint must concern a company that was participating business in the Insights Association DPF Services Program. For the complaint to be accepted, the individual must already have made a good faith attempt to resolve the complaint directly with the participating business and the complaint must allege that the participating business has violated the DPF Principles with respect to an individual's personal data or the personal data of a child under 13 of whom the individual is the parent or guardian.

# Model complaint language:

(The Organization) has further committed to refer unresolved DPF complaints to Insights Association DPF Services Program, an alternative dispute resolution provider located in the United States.

If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <a href="https://www.insightsassociation.org/Resources/Data-Privacy-Framework/Information-for-EU-Swiss-Citizens-to-file-a-complaint">https://www.insightsassociation.org/Resources/Data-Privacy-Framework/Information-for-EU-Swiss-Citizens-to-file-a-complaint</a> for more information and to file a complaint. These dispute resolution services are provided at no cost to you.

All eligible complaints will be reviewed within 24 hours, and assistance will be provided to help the complainant individual and the participating business reach a resolution. As of the date of this report, there are no reported complaints from any Insights Association DPF Services Program participating organization.

A participating business must comply with the final determination of any dispute submitted to the Insights Association DPF Services Program. However, participating in the association's dispute resolution process will not affect the legal rights of a consumer.

Complaints against participants in the Insights Association DPF Services Program are handled by the International Centre for Dispute Resolution/American Arbitration Association (ICDR/AAA) and the administrative procedures described <a href="here">here</a>.

If the complainant has failed to resolve the eligible complaint by working directly with the participating company, s/he may initiate the dispute resolution process by completing this form and submitting it by e-mail or regular mail according to the instructions listed on the form.

## Program statistics: Eligible complaints

The Insights Association DPF Services Program supported member companies in achieving self-certification to the EU-US DPF, UK Extension to the EU-US DPF, and Swiss-US DPF. In fulfilment of the Recourse, Enforcement and Liability Principle of the DPF, participants in the Insights Association DPF Services Program engaged IRM services operated by the International Centre for Dispute resolution (ICDR). These IRM services were available at no cost to individuals. For a detailed annual report, as it relates to the Insights Association Data Privacy Framework Services Program from July 17, 2024, through July 16, 2025, containing information about the total number of DPF-related complaints received; the types of complaints received; dispute resolution quality measures; and the outcomes of the complaints received, including the number and types of remedies or sanctions imposed, please see the most recent ICDR annual report published on its website <a href="https://go.adr.org/dpf\_irm.html">https://go.adr.org/dpf\_irm.html</a>.