### **People and Places Research Privacy Notice**

## 1. Important information and who we are

This privacy notice sets out how People and Places Research Limited (**we**, **us**, **our**) uses and protects your personal data. We are the controller responsible for your personal data. This privacy notice gives you information about how we collect and use your personal data when you use our website or take part in our market research.

# 2. Types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity data: includes your name, title, marital status, date of birth, and gender.
- Contact data: includes your billing address, postal address, email address and telephone numbers.
- Financial data: includes bank account and payment card details.
- **Profile data**: includes any information you provide via the "contact us" form on our website and any information you provide as part of our market research or during any meetings, calls and conversations with us, including your interests, preferences, feedback and survey responses.
- Usage data: includes information about how you interact with and use our website.
- **Technical data**: includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access our website.
- Communications data: includes your communication preferences.

We also collect, use and share **aggregated data** such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' data to calculate the percentage of individuals taking part in our market research or to analyse general trends in the information gathered from the market research to help improve our service offering.

In certain circumstances, our collection of the different categories of data set out above may include the collection of special categories of personal data about you (this may include details of your race or ethnicity, religious or philosophical beliefs, political opinions, or information about your health).

## 3. How is your personal data collected?

We use different methods to collect data from and about you, including through:

- Your interactions with us. You may give us your personal data by using our website, filing in online forms or by corresponding with us by post, phone, email, video calls or otherwise. This includes personal data you provide when you:
  - o take part in our market research and/or surveys;
  - take part in calls and meetings with us;

- o ask questions or give us information via your use of our website; or
- o give us feedback or contact us.
- **Third parties.** We may receive personal data about you from various third parties if, for example, you have clicked on an online advert (such as via a Google webpage or via Facebook) to take part in our market research.

## 4. How we use your personal data

We will only use your personal data for the purpose for which we collected it, which includes to manage your relationship with us or to enable you to participate in our market research or complete a survey.

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- Legitimate interests: We may use your personal data where it is necessary to conduct our
  business and pursue our legitimate interests, for example to check you are eligible to participate
  in our market research and allow you to do so, or to respond to any queries you've submitted to
  us via the website. We do not use your personal data for activities where our interests are
  overridden by the impact on you (unless we have your consent or are otherwise required or
  permitted to by law).
- Consent: We rely on consent only where we have obtained your active agreement to use your
  personal data for a specified purpose, for example if we have asked you for consent to take part
  in our market research or a survey or to record our video calls or meetings with you as part of
  such market research and/or surveys.

**Special category data** – Where we process special category data, we only do so where either (a) we have obtained your explicit consent to do so, or (b) it is necessary in the context of legal claims or where another legal ground other than explicit consent is available to us under relevant data protection legislation.

# 5. Disclosures of your personal data

We may share your personal data within our organisation or with external third parties such as:

- our clients for whom we may share the results of market research and/or surveys with; and
- third parties we work with to enable us to carry out our market research.

We require all our third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### 6. International transfers

We will not transfer your personal data outside of the UK or EEA.

# 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit

access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### 8. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data – please see Section 9 (Your legal rights) below for more information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

You have a number of rights under data protection laws in relation to your personal data. You have the right to:

- Request access to your personal data (commonly known as a "subject access request").
   This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. However, we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-

readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in some circumstances.
- Right to complain. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (<u>www.ico.org.uk</u>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

If you wish to exercise any of the rights set out above, please contact us using the details set out in Section 10 below.

**No fee usually required** – You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you – We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond** – We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

# 10. Contact us

If you have any questions about this privacy notice or our data protection practices, please contact us in one of the following ways:

• Via email: info@ppresearch.co.uk

• Via post: 130 Shaftesbury Avenue, London, England, W1D 5EU