

OPINIUM PRIVACY POLICY

1 CONTENTS

2	Introduction	2
3	Security	2
4	Data that we hold	2
4.1	Purpose	2
4.1.1	Why do we process data?	3
4.1.2	What data is processed?	3
4.1.3	How long do we hold data for?	3
4.2	Panellist	3
4.2.1	Why do we process data?	4
4.2.2	What data do we hold?	4
4.2.3	How long do we hold data for?	4
4.2.4	Cookies	4
4.3	Our people	5
4.3.1	Applicants	5
4.4	Suppliers	5
4.4.1	Why do we process data?	5
4.4.2	What data do we hold?	6
4.4.3	How long do we hold data for?	6
5	People who use our website	6
6	Sharing personal data	6
7	Locations of processing	7
8	Individual's Rights	7
9	Complaints	7
10	Data Controller and contact information	8
11	Changes to our privacy statement	8

2 INTRODUCTION

Opinium (“we”, “us”, or “our”) is committed to protecting and respecting the personal data that we hold. This privacy statement describes why and how we collect and use personal data and provides information about individuals’ rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for the purposes described in this privacy statement or as made clear before collecting personal data.

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose are set out in the relevant sections below.

The personal data that is provided to us is provided either directly from the individual concerned, from a third party acting on behalf of an individual.

Where we receive personal data that relates to an individual from a third party, we request that this third party inform the individual of the necessary information regarding the use of their data. Where necessary, reference may be made to this privacy statement.

3 SECURITY

We take the security of all the data we hold seriously. Staff are trained on data protection, confidentiality and security.

We have a framework of policies and procedures which ensure we regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

4 DATA THAT WE HOLD

4.1 PURPOSE

We provide services to individuals as well as organisations. The exact data held will depend on the services to be provided.

Where we engage with individuals, we may collect and process personal data in order to satisfy a contractual or operational obligation. We request that individuals only provide the personal data that is required for us to fulfil our contractual or operational obligation.

4.1.1 Why do we process data?

Where data is collected for professional services, it is used for a number of purposes, as follows;

- Providing services to you. Data is processed in accordance with the purpose which we have collected it, and may sometimes be further clarified in written documentation supplied before any data processing may occur. We will predominantly process your data for Research purposes and also to pay you for any surveys you have completed for us.
- Individual needs. When communicating with and assessing the needs of clients, personal data may be processed in order to ensure that their needs are appropriately satisfied. This may include assessing whether the collection of services are provided to our clients are appropriate.
- Administration. In order to manage and administer our business and services, we may collect and process personal data. This may include (but is not limited to) maintaining internal business records, managing client relationships, hosting events, and maintaining internal operating processes.
- Regulatory. In order for Opinium to do what it does, we may from time to time be required to collect and process personal data in order to fulfil regulatory, legal or ethical requirements. This may include (but is not limited to) the verification of identity of individuals.

4.1.2 What data is processed?

The data that is processed is dependent on the service that is being provided and on the recipient of this service.

- **Services to customers and clients.** Personal data may include Name, DOB, Research Unique ID, Bank Details, Next of Kin, Job titles, Photographs, and any other specifically relevant data.

4.1.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose(s) for which it was collected, there may also be occasions which will require data to be kept for longer, however this will typically be for legal purposes.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it. We will periodically review this data, to ensure that it is still relevant and necessary.

4.2 PANELLIST

When you register to become an Opinium Panel Member on www.opinium.co.uk or www.opiniumresearch.co.uk (the "Website"), you will be required to provide a range of information about yourself and we will process and store this information.

4.2.1 Why do we process data?

Where personal data on business contacts is held, it is used for a number of purposes, as follows;

- Your Information will be used to process your answers to any surveys in which you have chosen to participate
- We will also use Your Information to administer, support, improve and develop our business and may contact you occasionally for your views on our services.
- Marketing: We may also use Your Information to let you know about special offers, new products, services, promotions, and other similar information which we offer which may be of interest to you including invitations to participate in surveys, free prize draws, website promotions and other activities related to Opinium Research LLP's market research business. We will only market to you when we have your explicit consent, or if we feel we have the legitimate interest to do so. We may contact you by post, telephone, as well as by e-mail as per your stated preferences. If, at any time, you wish to update Your Information or if you wish to opt-out of receiving these notifications from us please go to www.opiniumresearch.co.uk and follow the on screen instructions.
- Administration and management

4.2.2 What data do we hold?

Personal data that will be stored on our internal database, but is not limited to, name, email address, address, IP Address.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

We will never share your personal data with a third party without prior consent from you.

4.2.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose(s) for which it was collected.

4.2.4 Cookies

“Cookies” are small pieces of information sent by a web server to a web browser, which enables the server to collect information from the browser.

We may use Cookies for the following purposes:

- to simplify the logging on process for registered users of the Website;
- to help ensure the security and authenticity of registered users;
- to provide the mechanisms for completing our online surveys; and
- to enable traffic monitoring

Cookies can be disabled by changing the settings on your browser. Most browsers allow you to turn off the cookie function. If you want to know how to do this please look at the help menu on your browser. [Even without a cookie you can use most of the features on the Website].

4.3 OUR PEOPLE

We collect personal data for our people as part of the administration, management and promotion of our business activities.

Our staff handbook explain further how personal data is held for our staff and partners.

4.3.1 Applicants

Where an individual is applying to work for Opinium, personal data is collected through the application process.

There are a number of purposes that personal data for applicants are collected.

- Employment. We process an applicant's personal data in order to assess their potential employment at Opinium.
- Administration and management. We may also use this personal data in order to make informed management decisions and for administration purposes.

Personal data collected for applicants is held for as long as necessary in order to fulfil the purpose for which it was collected, or for a maximum of one year where those purposes no longer become necessary.

4.4 SUPPLIERS

We collect and process personal data about our suppliers, subcontractors, and individuals associated with them. The data is held to manage our relationship, to contract and receive services from them, and in some cases to provide professional services to our clients.

4.4.1 Why do we process data?

- Receiving goods and services. We process personal data in relation to our suppliers and their staff as necessary to receive the services.
- Providing services to our clients. Where a supplier is helping us to deliver professional services to our clients, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our clients.
- Administering, managing and developing our businesses and services. We process personal data in order to run our business, including:
 - managing our relationship with suppliers;
 - developing our businesses and services (such as identifying client needs and improvements in service delivery);
 - maintaining and using IT systems;
 - hosting or facilitating the hosting of events; and
 - administering and managing our website and systems and applications.
- Security, quality and risk management activities. We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify

harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.

- Complying with any requirement of law, regulation or a professional body of which we are a member. We are subject to legal, regulatory and professional obligations. We need to keep certain records to show we comply with those obligations and those records may contain personal data.

4.4.2 What data do we hold?

We will hold supplier's names, contacts names, and contact details of suppliers.

4.4.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights.

5 PEOPLE WHO USE OUR WEBSITE

When people visit our website, personal data is collected both through automated tracking and interacting with various forms on the website or apps (collectively referred to as the websites).

Personal data may be collected when individuals fill in forms on our websites or by corresponding with us by phone, e-mail or otherwise. This includes information provided when an individual registers to use our websites, subscribe to our service, make an enquiry.

6 SHARING PERSONAL DATA

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

Third party organisations that provide applications/functionality, data processing or IT services to us

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.

- Clients – We may share your data with the clients which the surveys you take are related too.

- Freelancer – We may share your data with freelancers but this is only to carry out researches on our behalf.
- Research Agencies – We may share your data with research agencies who will carry out researches on our behalf.
- Law enforcement or regulatory agencies or those required by law or regulations.

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

7 LOCATIONS OF PROCESSING

The data that we collect from you may be transferred to, and stored at a destination inside the European Economic Area (“EEA”). By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

8 INDIVIDUAL’S RIGHTS

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller.
- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email to enquiries@opinium.co.uk.

9 COMPLAINTS

We hope that you won’t ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to enquiries@opinium.co.uk. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

10 DATA CONTROLLER AND CONTACT INFORMATION

The data controller for Opinium is Opinium

If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

58 Great Sutton St, London, EC1V 0DG

11 CHANGES TO OUR PRIVACY STATEMENT

Updates to this privacy statement will appear on this website. This privacy statement was last updated on 25/05/2018.