

## **SUREYLAB LIMITED**

### **PRIVACY POLICY - VERSION 2.0, 27 APRIL 2021**

#### **INTRODUCTION AND IMPORTANT INFORMATION**

Surveylab Limited (“**We**” or “**us**”) are committed to protecting and respecting your personal data and privacy.

This privacy policy relates to how we use and collect personal data from you when you use or purchase our services, or access our website. It also relates to how we use and collect personal data that our customers who instruct us to carry out surveys on their behalf (“**Customers**”) provide to us about their employees, customers, visitors, users, members or consumers (“**Survey Participants**”) and how we use and collect personal data which may be provided to us by those completing our surveys (we call this data “**Survey Data**”). It also relates to our use of any personal information you provide to us by telephone (including SMS), in written correspondence (including letter and email) and in person.

Please note that:

- our services and our website are not intended for children under the age of 18 and we do not knowingly collect data relating to children; and
- our website and services may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Whenever you provide personal data, we are legally obliged to use your information in line with all applicable laws concerning the protection of such information; including the Data Protection Act 1998 and 2018 (DPA) and The General Data Protection Regulation 2016 (GDPR) to the extent to which it is applied by UK GDPR as defined by the Data Protection Act 2018 together with other subsequent laws (“**Data Protection Laws**”).

This privacy policy also forms part of our terms of business and is not intended to override them. This policy may be amended or updated from time to time and any revisions will be posted to this page, so please check back regularly.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here:

1. WHO WE ARE AND HOW TO CONTACT US
2. THE DATA WE COLLECT ABOUT WEBSITE USERS AND CUSTOMERS
3. HOW WE USE INFORMATION ABOUT WEBSITE USERS AND CUSTOMERS
4. THE DATA WE COLLECT ABOUT SURVEY PARTICIPANTS AND HOW WE USE IT
5. LAWFUL BASIS FOR PROCESSING
6. THIRD PARTIES AND SHARING INFORMATION
7. WHERE YOUR DATA IS HELD
8. APPLICATIONS TO WORK FOR US
9. DATA RETENTION
10. YOUR RIGHTS
11. CHANGES TO THIS PRIVACY POLICY

## 1. WHO WE ARE AND HOW TO CONTACT US

- 1.1 For the purpose of the Data Protection Laws, the data controller for this website is Surveylab Limited. We are a private limited company registered in England and Wales under company number 04741566. Our registered office is at Runway East, 20 St. Thomas Street, London, SE1 9RS. If you want to request more information about our privacy policy or information regarding data protection you should contact us using the details provided below. If you are a Survey Participant then the data controller for your data will be our Customer and we will be acting as a data processor for them in processing your data and will only process your data on their instructions. Therefore, if you have any concerns about how the company who has instructed us to do the survey you have received (our Customer) handles your data, it may be best to contact them directly in the first instance.

FAO: Dan Wardle

Surveylab Limited, Runway East, 20 St Thomas Street, London SE1 9RS

United Kingdom

Email: [privacy@surveylab.co.uk](mailto:privacy@surveylab.co.uk)

Telephone: 020 3137 9422 and ask to speak to the Dan Wardle.

- 1.2 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 2. THE DATA WE COLLECT ABOUT WEBSITE USERS AND CUSTOMERS

*The following sections relate to how we process personal data about users of our website, Customers and potential customers of our business. If you have received a survey from us sent by us on behalf of one of our Customers these sections may not apply to you and you may prefer to skip straight to Section 4 of this Privacy Policy*

- 2.1 We collect and process personal data. Typically the personal data we collect and process will include identity, contract, transactional, financial, technical, profile, usage, marketing, communications and Survey Data such as:
- 2.1.1 **Identity Data** includes first name, last name, title or other identifier (such as job title), marital status, date of birth, gender and images.
  - 2.1.2 **Contact Data** includes correspondence address, billing address, email addresses and telephone numbers.
  - 2.1.3 **Transaction Data** includes details about services you have purchased from us or your visits to our premises.
  - 2.1.4 **Financial Data** includes bank account and payment card details.
  - 2.1.5 **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, and other technology on the devices you use to access this website.

- 2.1.6 **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and responses to surveys about our services.
- 2.1.7 **Usage Data** includes information about how you use our website, products and services.
- 2.1.8 **Marketing and Communications** data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- 2.1.9 **Survey Data** we will also process personal data about Survey Participants who are your employees, customers, visitors, users, members or consumers – for further details about how we process Survey Data please see section 4 of this Privacy Policy

Please note that we may collect and/or process other personal data from time to time.

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

2.2.1 **Direct interactions.** You may give us your Identity, Contact, Profile and Financial Data or Survey Data by filling in forms or by corresponding with us by post, phone, messaging service, email or otherwise. This includes personal data you provide when you:

- (a) contact us with an enquiry;
- (b) become a Customer with us;
- (c) receive services from us;
- (d) request marketing and other information to be sent to you;
- (e) enter a promotion with us;
- (f) complete a survey we have sent you about our services; or
- (g) give us feedback or contact us.

2.2.2 **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

2.2.3 **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- (a) Technical Data from the following parties:
  - analytics providers;
  - advertising networks; and
  - search information providers.

- (b) Contact, Financial and Transaction Data from providers of technical, or payment services.
- (c) Identity and Contact Data from data brokers or aggregators, including marketing agencies, trade organisations or exhibition organisers.
- (d) Identity and Contact Data from publicly available sources such as Companies House.

2.3 Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel all or part of a service you have with us but we will notify you if this is the case at the time.

### **3. HOW WE USE INFORMATION ABOUT WEBSITE USERS AND CUSTOMERS**

3.1 We use information held about website users, potential customers and Customers to:

- 3.1.1 carry out our obligations arising from any contracts entered into between you and us and provide our services, including any third party services we make available to you;
- 3.1.2 carry out feedback and research on our services; and
- 3.1.3 notify you about changes to our services.

3.2 We never sell your data to third parties or allow third parties to contact you without your permission.

3.3 We share your data with third parties where there is a legal obligation for us to do so or we have identified a valid lawful basis as set out in the table below (please also see Section 6 below). We may process your personal data without your knowledge or consent where this is required or permitted by law.

3.4 We have set out below in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new user or Customer.	Identity Contact	Performance of a contract with our Customers
To provide our services to our Customers and to process related transactions, including: Manage payments, fees and charges Collect and recover money owed to us	Identity Contact Transaction Usage Marketing and Communications	Performance of a contract with our Customers Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy Asking our Customers to leave a review or take a survey	Identity Contact Profile Marketing and Communications	Performance of a contract with our Customers Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable our Customers to partake in a competition or complete a survey about the services we provide	Identity Contact Profile Usage Marketing and Communications	Performance of a contract with our Customers Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical Usage Profile	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Technical Usage Profile Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

- 3.5 We also collect, use and share aggregated data, such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data, but is not considered to be personal data in law as it will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate a percentage of users accessing a specific feature of our services. However, if we combine or connect your aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used solely in accordance with this policy.
- 3.6 We will not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### 4. THE DATA WE COLLECT ABOUT SURVEY PARTICIPANTS AND HOW WE USE IT

*The following section relates to the personal data we process about Survey Participants. If you are a Customer, potential customer or a user of our website please also see Sections 2 and 3 above.*

- 4.1 Survey Data includes data held by us that directly or indirectly relates to individuals who complete surveys we carry out on behalf of our Customers. We only collect data about Survey Participants from our Customers who provide us with this data to enable us to carry out surveys on their behalf or from Survey Participants directly and we process this personal data as follows:

4.1.1 **Data we receive from our Customers about Survey Participants** - In most cases our Customers will provide us with names, email addresses and in some cases home addresses or phone numbers to enable us to send surveys to Survey Participants (either by email, text message or post) on our Customers' behalf. They may also provide us with certain other demographic information, for example for an employee survey the department, manager level, length of service, date of birth and gender for the Survey Participant may be provided. The type of data we process about Survey Participants depends on the personal data we receive from our Customers.

4.1.2 **Data submitted by Survey Participants in response to a survey** - We will also receive and process personal data which is submitted by a Survey Participant when they complete a survey. The types of personal data processed will vary depending on the survey and its research objectives. This Survey Data is processed by us and sent back to our Customer. Surveylab may merge survey data with other demographic data provided to us by our Customers to provide breakdowns of aggregated results by these demographics (for example by team or store/office location). In some cases this data is anonymised before we send it back to our Customer but this depends on our contract with the Customer – whether the data will be anonymised or not will be explained in the survey instructions Survey Participants receive from us.

4.1.3 **'Anonymous' Surveys** - In some cases Survey Participants are kept anonymous to our Customers. Where this is the case, Surveylab removes the personal identifying information in any results or data shared with the Customer (for example names, email address, date of birth, unique ID). For employee surveys we will usually only provide breakdowns where there are a sufficient number of answers to ensure no individual(s) can be identified but in some cases a survey response may contain information that a Customer recognises to enable them to link it back to a particular Survey Participant (for example where comments have been provided by a Survey Participant which makes them identifiable to those who work with them). Whilst aggregated data may be derived from Survey Participants personal data it is not considered to be personal data in law as it will not directly or indirectly reveal their identity. However, if we combine or connect a Survey Participant's aggregated data with their personal data so that it can directly or indirectly identify them, we treat the combined data as personal data which will be used solely in accordance with this policy.

4.2 We do not normally collect any Special Categories of Personal Data about Survey Participants (this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. If a particular survey asks for Special Categories of Personal Data we will inform Survey Participants of this when they receive the survey from us. A Survey Participant may decline to answer a specific question or exit a survey at any time.

4.3 We may collect and/or process other personal data from time to time. Processing of Survey Data is necessary for our legitimate interests to enable us to fulfil our contracts with our Customers for the provision of our services. We process this personal data to fulfil our contracts with our Customers to provide them with survey responses. Participation in a survey is voluntary and if a Survey Participant receives a survey from us they can decline to answer a specific question or exit the survey at any time.

4.4 We will not use Survey Data other than for our legitimate interests to enable us to fulfil our contracts with our Customers and will only process the personal data provided by our Customers and any data received via the surveys we send for the purpose of facilitating a survey and results analysis. In processing this personal data we will be acting as a data processor for our Customers who will be the data controller for Survey Participant's personal data. We never sell Survey Participant data to third parties. We share Survey Data with third parties where there is a legal obligation for us to do so or we have identified a valid lawful basis to do so (please also see Section 6 below). We may process personal data without a Survey Participant's knowledge or consent where this is required or permitted by law.

## 5. **LAWFUL BASIS FOR PROCESSING**

5.1 We only process personal data (which may include providing it to a third party) where we have identified a valid lawful basis to do so. These are as follows:

5.1.1 **Contractual obligation** – means processing that is necessary to comply with our obligations arising out of a contract, for example, where you have bought services from us we will use the personal data you provide to fulfil our contractual obligations.

5.1.2 **Legitimate Interest** – means in the interest of our business in conducting and managing our business to enable us to give our Customers the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on individuals (both positive and negative) and individuals rights before we process personal data for our legitimate interests. Where we use legitimate interests we will record our decision on making this decision. We rely on legitimate interest where processing of the data we hold does not, in our opinion, affect an individuals rights or freedoms and is proportionate to our interests e.g. keeping you up to date with our latest services, obtaining your feedback on our service or fulfilling our contractual obligations with our Customers.

5.1.3 **Consent** – We will seek to obtain consent to process:

- (a) personal data outside our contractual obligations (see above) unless we have identified a Legitimate Interest (see above); and
- (b) any special category data.

5.1.4 **Legal obligation** – We may process personal data where it is necessary for us to do so to comply with the law.

## 6. THIRD PARTIES AND SHARING INFORMATION

6.1 We will keep personal data within our organisation except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services. We have contracts in place with our data processors. This means that they cannot do anything your personal data unless we have instructed them to do so. They will not share your personal data with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

6.2 Please see below the list which sets out the categories of recipients of personal data.

<b><i>SERVICE PROVIDERS WHO MAY RECEIVE YOUR PERSONAL DATA</i></b>
<i>IT Support Services</i>
<i>Email Provider</i>
<i>SMS Service Provider</i>
<i>Banks (for Customer transactions where applicable)</i>
<i>Accountants (for Customer transactions where applicable)</i>
<i>Solicitors</i>
<i>Software Providers</i>
<i>Couriers and other mail providers</i>
<i>Marketing Agencies</i>



- 6.3 In addition third parties may provide us with personal data and they should only do so where the law allows them to. We will receive information about Survey Participants from our Customers who use our services when they provide us with personal data about Survey Participants to enable us to send surveys on their behalf. When we share survey responses with our Customers they will process any personal data in accordance with their own privacy policies and this is outside of our control. If a Survey Participant has any questions about how our Customers process their personal data they should contact them directly in the first instance.

## **7. WHERE YOUR DATA IS HELD**

- 7.1 Your data is stored by us and our processors in the UK or EEA. Where your personal data is transferred outside of the UK or the EEA, we have ensured that:

7.1.1 an adequacy decision has been made by the European Commission permitting the transfer of data to that country; or

7.1.2 standard contractual clauses (SCCs) are in place and we have received assurances that an adequate level of protection of the personal data is achieved (based on a case by case assessment of the circumstances of the transfer), including adequate technical and operational measures in place to protect the personal data.

- 7.2 If our Customer is based outside of the UK or the EEA we will share Survey Data with them in accordance with our contract with them.

## **8. APPLICATIONS TO WORK FOR US**

If you apply to work for us (directly or indirectly) in any role we may receive data about you from third parties. In addition, we will keep the details of your application and any additional information provided to us by you or others during your application so that we can keep you informed of future opportunities that you may be interested in. If you do not wish for us to keep your details for this reason, please let us know by contacting us using the details provided in this policy.

## **9. DATA RETENTION**

Our data retention policy is dictated by the Data Protection Laws and is available for inspection by submitting a written request using the contact details provided in this policy.

## 10. YOUR RIGHTS

10.1 Under the Data Protection Laws your rights are:

10.1.1 **To be informed** – We must make this privacy policy (sometimes referred to as a privacy notice) available with the emphasis on transparency over how we process your data.

10.1.2 **Access** – You are entitled to find out what details we may hold about you and why. We strive to be as open as we can be in terms of giving people access to their personal data. Individuals can find out if we hold any of their Personal Data by making a formal request under the Data Protection Laws. Such requests should be in writing to the contact details provided in this policy. If your details have been provided to us by our Customer you may wish to contact our Customer in the first instance as they will have provided us with your information.

10.1.3 **Rectification** – We are obliged to correct or update your details. We will correct or update your data without delay provided you make the request in writing to the contact details provided in this policy, clearly specifying which data is incorrect or out of date.

10.1.4 **Erasure** – This is also known as the request to be forgotten. Under Data Protection Laws you have the right to erasure under specific circumstances. A request for your personal data to be deleted will be decided on a case by case basis and should be submitted in writing to the contact details provided in this policy.

10.1.5 **Restrict processing** – You have the right to ‘block’ or suppress the processing by us of your personal data.

10.1.6 **Portability** – You have the right to obtain and reuse your personal data that you have provided to us.

10.1.7 **Object** – You have the right to object to us processing your data in relation to direct marketing and or profiling. To opt out of receiving electronic communications such as invites and reminder emails about a survey, you can submit a request by clicking <https://secure.surveylab.co.uk/unsubscribe/> or contacting us by emailing [privacy@surveylab.co.uk](mailto:privacy@surveylab.co.uk)

10.1.8 **Rights in relation to automated decision making and profiling** – We do not use automatic decision making or profiling.

10.2 Please note that you may need to provide identification in order to prove who you are if you wish to invoke any of your rights as provided by the Data Protection Laws and as summarised above.

10.3 If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

## 11. CHANGES TO THIS PRIVACY POLICY

We keep our privacy policy under regular review and you should check back regularly to ensure you are aware of changes to it. We may display this notice to you from time to time to help ensure you are aware of its contents.