

# Protecting Your Data

## Our Data Protection Policy for Applicants and Project Participants

Updated 20 January 2021

### Earning and keeping your trust

At Intelligencer, our priority is to secure the trust and confidence of everyone who takes part in our market research projects.

Without you, we wouldn't be able to do our job of advising brands and companies on how to improve their products and services.

Therefore, we take data protection very seriously. In this document we describe what data we collect, how we process it and use it, and how we keep it secure.

In particular, this document focuses on *personal data* which is data that can be used to identify a living individual, such as your name, email address, physical address, photographs and videos. Personal data includes *sensitive personal data* such as your race/ethnicity and sexual orientation which are treated with even more care.

Our legal obligations are: to keep personal data up-to-date, to keep this data stored securely and protect it from loss, misuse, unauthorised access and disclosure, not to collect or retain unnecessary amounts of personal data, and to destroy personal data securely when no longer needed.

### Summary of Key Points

- We only use your personal data for the purpose for which you provided it and gave your consent.
- If there is any other reason why we want to process your personal data, such as letting you know about other projects that may interest you, we'll always ask your consent first.
- We only share select data with external parties where it is necessary for us to do so to operate our business and provide our service (e.g. making payments to you for your participation in a project), or if we are required to do so by law. Otherwise we'll always ask for your consent.
- Each research project that we do is sponsored by a client company who retains exclusive access to the research findings. In other words, our projects are private and not shared in the public domain. On the rare occasions where this is not the case, for example our client intends to publish the final research report in the public domain, we will specify this when we advertise the project and explain what will be shared, so that you can make an informed decision about whether to participate.
- You can always get in touch to ask us what personal data we hold and to correct and update your data if anything changes. For an overview of your rights see Section 5 – Your rights and access to your data.

### About us and Data Protection law

Intelligencer Ltd. is a market research consultancy serving global brands and companies.

The company is registered in England (Company Registration Number 10451837).

Our registered address is: 2 Beverley Court, 26 Elmtree Road, Teddington, TW11 8ST, U.K.

We apply high standards of data protection to all applicants and participants in our projects regardless of your location in the world.

Intelligencer is both a *data processor* (we collect and process data) and a *data controller* (we determine the purposes of data processing).

Intelligencer is registered with the Information Commissioner's Office (I.C.O.) in the U.K. which is responsible for monitoring compliance with data protection regulation. Our certificate number is ZA363387.

If you have any questions at all in relation to this document or any other questions related to data protection, please contact Jacky Parsons, the Director of Intelligencer at the following address: [dataprotection@intelligencernetwork.com](mailto:dataprotection@intelligencernetwork.com)

## **Our Data Privacy Policy in Detail**

### **Introduction**

#### **(i) Why we collect and process your data**

First off, we want you to know that Intelligencer does not sell, rent or trade email or telephone lists with other companies and businesses for sales or marketing purposes.

We process personal data to enable us to provide market research services to our clients; promote our services; maintain our accounts and records, and to support and manage our team members here at Intelligencer. This is our lawful basis for collecting and processing personal data.

We always process your personal data based on your consent. In order for you to give free and informed consent, we will always explain what data we are collecting, why we are collecting it and how we will use it and secure it, in this Policy document and in our personal communications with you.

You have the right to withdraw your consent and therefore withdraw from a live project and future communications – see the section on *Your rights and accessing your data* below.

#### **(ii) Changes to this Policy**

In this Data Protection Policy, we've provided lots of detailed information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

If we update this Policy, we will publish the new version on our website and notify everyone on our contact list.

## Sections of the Policy

Section 1	About Intelligencer and our projects
Section 2	Types of data we collect
Section 3	How we use your data
Section 4	What data we share
Section 5	Your rights and access to your data

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### Section 1 About Intelligencer and our projects

We set up Intelligencer to help the teams working at global brands to get to know their customers and potential customers better.

We believe that when designers, communications teams and business decision-makers understand people's lives, needs and preferences, they are able to design better products, deliver better services and make better decisions.

Most of our projects are small scale, typically with fewer than 50 participants.

The success of our projects relies on you - as a potential applicant and participant in a project - feeling comfortable with the information you're being asked to share and confident to express your experiences and views in your own words, without fear of any negative consequences such as unwanted communications.

Each research project that we do is sponsored by a client company who retains exclusive access to the research findings. In other words, **our projects are private and not shared in the public domain.** (See the rare exception below.)

The outputs of our projects, such as reports or video edits, are for internal use only by our clients. They become part of the intellectual property of our clients, and as such they are subject to confidentiality agreements with employees and contracted partner agencies who may wish to view the material. An example of such an agency would be their contracted creative agency or media agency, a retail distributor of their products or a manufacturing partner. By legal contract, these documents are not allowed to be distributed outside this circle.

In the case that a client wishes to share any material from a research report in the public domain, for example at an industry conference, we seek additional consent from the people who took part in that project, explaining the purpose.

Likewise, if we wish to feature excerpts such as quotes or images from research reports on our website or to advertise our services, we will contact the people concerned to seek their approval.

**Very occasionally** we may undertake a project that is intended for publication in the public domain. We will make this clear when we advertise the project, and explain what will be shared, where and how, so that you can decide whether you wish to proceed with your application or participation in the project.

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## Section 2 Types of data we collect

We collect data at two stages:

- (i) When you apply to take part in a project
- (ii) When you take part in a project

Below, we describe the kinds of data we collect at each stage.

### (i) Data we collect when you apply to one of our projects

When you apply to take part in one of our projects, we will ask you for information about yourself, and your views and purchases of products or services related to the category we've exploring. This information helps us make a decision about your suitability for the project.

We also have a professional duty to ensure that all applicants are bona-fide, i.e. you are who you say you are and aren't applying under a false identity. This information helps us fulfil that duty.

We only ask for information that is necessary for the selection process and do not collect unnecessary or excessive data (for example, we usually need to know your age, but not your full date of birth).

We will **always** ask for *personal data* such as:

- Your full name, email address and telephone number so we can contact you with the outcome of your application
- Details about your gender, age, location and the kind of work you do or your educational background, so that we can identify people who fit the profile we're looking for.
- Details about your racial ethnicity and nationality. This information is considered *sensitive personal data*. It is really important to us as we seek to ensure racial diversity in our projects.

We will **sometimes** ask for *personal data* such as:

- A picture of you to help us understand your personal style (for example, when we're doing projects in fashion and footwear categories).
- Links to your public social media accounts, blogs or portfolios. These help us to understand you better including how you express yourself through words and imagery, and therefore can help us recommend you for inclusion in our projects. We do not require you to share us on any social media account that is set to private.

### (i) Data we collect when you take part in one of our projects

We use the information you supplied at the application stage. Additionally, we ask for:

- Payment details. We give participants in our projects a financial payment in thanks for the time and effort it takes to complete the project. In order to do this, we will ask for your payment details and preferences once your participation in the project has been confirmed. Payments are made via payment service providers or bank transfer.
- A bunch of questions about your views and experiences! When you take part in one of our projects, we will ask you lots of questions about your life, views and experiences. Your answers may be written or recorded by you on video, and may include photos. (Please note that photographs and videos are considered *personal data*, whereas opinions about products and services are not). At all times it's at your discretion what you choose to say or share with us.

## Section 3 How we use your data

### What we use and keep at Intelligencer, and why

With your consent, we will keep the following information in our records:

- (i) **Full name and email address.** With your consent, we keep your full name and email address on record so that we can contact you about a current project you have applied to or are taking part in, or another project that may be of interest to you. (You can request to be removed from our mailing list at any point).
- (ii) **Information you shared when you applied to one of our projects.** We keep your application data on record for up to one year in case we are asked to conduct any further projects with the same client, so we can invite you to participate in these projects without you having to complete another application form. We will check you are happy to be re-contacted when you apply. Of course, you can opt out if you wish and we will delete your details and application data. Just let us know.
- (iii) **Record of payments.** We keep a record of payments made to participants in our projects to fulfil accounting and tax requirements but we do **not** keep your bank account details in our records or emails.
- (iv) **Information you shared when you took part in a project.** We use the information you share with us to compile a report which we typically illustrate with some quotes and images from the project. We only associate these quotes and images with your first name and city/state/country location in our reports. For example, "Dan, New York" or "Emily, U.K".

We typically keep access to the data gathered on projects for between 1-3 years, depending on the project (some projects are longer-term than others). This is because we may be asked to re-look at the information in the light of new developments at the client company. This is also typically the period during which a client will read and refer to a research report which we have created. After 3 years, a client would typically consider the information to be out-of-date.

Until the project is complete (i.e. the final reports have been written), we need to keep your personal identifying information connected to your answers on the project. Your personal identifying information is only visible to team members at Intelligencer authorised to work on the project.

In the reports and other records we keep of your responses and share with our client, your responses will only be associated with your first name and location as described above, and **not** with your full name or contact addresses.

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## Section 4 What data we share

### What we share with the client company sponsoring the project

As a rule we **DO NOT** share your full name, address or contact details with our clients. If there is an exception, we will **ALWAYS** seek your consent first and explain personal data we would like to share. There are generally only three exceptions:

1. If you have agreed to be interviewed in your home or neighbourhood and we are arranging for you to meet us, member(s) of the client team or a videographer. In this instance we'll need to share details that ensure the meeting can be happen successfully such as your physical address or mobile phone number.

2. If you are attending a workshop we have organised, we may need to let the venue know the names of people attending and sometimes your phone number so they can follow up if you are running late.
3. If we see potential for a future commercial collaboration between you and the client. In this case we will ask if you are interested in the introduction and seek your permission to share your email address.

### **What we share with the client company at the application stage**

At this stage we put forward a shortlist of recommended participants to the client sponsoring the project, with selected details about each participant. Typically the details include your first name and city/country, a few lines to introduce you including any information relevant to the category we're researching such as your usage of certain products.

If relevant or necessary to support your application, we may also share a photo that you have supplied or a link to a blog you publish or a PUBLIC social media account. We will let you know this at the application stage so that you can consent to this information being shared.

### **What we share with the client company when the project is live**

Project participants will be invited to share their views either on a private online platform or face to face in an interview or workshop setting. These views will be available to the Intelligencer and client team working on the project who are invited to join the platform or attend the interviews.

In online projects, the client team cannot see your full name, email address or I.P. address.

In face-to-face interviews, members of the team will only be shared on personal details that are necessary to enable them to attend the interview or meet up with you (e.g. your physical address, email address or phone number).

### **What we share in our reports for the client company**

We use the information and opinions you share with us on projects to compile a report which we typically illustrate with quotes and images from the project. We only associate these with the participants' first name and city/state/country location as described above.

We may also keep a transcript of the interview or online discussion we have had with you. The transcript will **not** contain your full name, contact addresses or I.P. addresses.

### **What we share with our partners**

We work closely with our partners to help us deliver our projects. Examples of partners include:

- Graphic designer
- Videographer
- Online survey software provider
- Payment service provider

We only choose to work with partners who we are satisfied are compliant with data protection laws.

Partners will only be shared on personal data that enables them to complete their duties at each stage of the project. This may include your email address, full name or other personal data such as photos or video you have shared.

For example, our international payments provider needs your name and email address in order to generate a log-in invitation to their secure payments site. Our graphic designer will need access to the photos that have been shared.

We do **NOT** share your data with third parties for any sales or marketing purposes.

## How we store your data

Information you share with us is stored securely and only for as long as we need it to fulfil our legitimate duties as a service provider and as a legally accountable company.

We regularly delete information you share with us over email or messenger services such as Whatsapp and always delete any bank account details you have shared with us as soon as we have processed your payment.

In the unlikely event of a data breach, we will notify you in accordance with data protection law.

## Transfer of Data outside the U.K.

We work for global brands whose headquarters or regional offices may be in countries outside the U.K.

We will only transfer personal data (such as images included in a report) to any person or entity situated outside the U.K. where either a binding international agreement or a legally-binding contract between us and such transferee means that the data subject will receive protection of their personal rights equivalent to those in the U.K.

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## Section 5 Your rights and access to your data

### Your rights and access to your information

You have the right to know what personal information we hold on you and to ask to view it, amend it or delete it from our records.

If you have given your consent to data processing, you have the right to withdraw your consent at any time, by contacting us. On receiving your request we will contact you and let you know if we are able to comply or if there are legitimate grounds for us to continue to store or process any of your data (e.g. for legal or accounting reasons).

If you wish to withdraw from a current, live or on-going project, we will usually be able to discontinue the processing of your information upon receipt of your request.

However, any processing performed prior to your withdrawal remains a legitimate processing based on a valid consent at the time. We will not be under the obligation to reverse the processing. For example, if you consented to take part in a project that has completed and where the final reports have been delivered, it will not be possible for us to remove references to you (such as images or quotes) incorporated in a report that has already been distributed within a client organisation, although we will be able to remove data stored in our system and any other systems that we are using to communicate with you.

### How to get in touch

Jacky Parsons is responsible for data protection at Intelligencer. Please get in touch with any queries or requests using this email address [dataprotection@intelligencernetwork.com](mailto:dataprotection@intelligencernetwork.com).

We may need to ask you to verify your identity in order to comply with your request.

If you are not happy with the way we have dealt with your data, you also have the right to contact the Information Commissioners' Office to lodge a complaint <https://ico.org.uk/global/contact-us/email/>.