

See Research – Privacy Policy

See Research a company incorporated in England and Wales whose registered office is at Riverside, 1st Floor, Cloister House, New Bailey St, Manchester M3 5FS (registered number 07838703) (“we/us/our”) holds personal data about our employees, clients, suppliers and other individuals for a variety of business purposes. We are committed to respecting your privacy and to complying with applicable data protection and privacy laws.

This policy applies to all products and services provided by us and sets out how we seek to protect personal data and ensure that staff understand the rules governing their use of personal data to which they have access in the course of their work. This policy is effective from 26 May 2018.

Definitions

Business Purposes

You give us your information either through this website or by any other means. We may seek to use your personal data for business purposes that may include the following:

- For the purposes of initiating market research into defined topics
- Compliance with our legal, regulatory and corporate governance obligations and good practice
- Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests
- Ensuring business policies are adhered to (such as policies covering email and internet use)
- Operational reasons, such as recording transactions, training and quality control, ensuring the confidentiality of commercially sensitive information, security vetting, credit scoring
- Investigating complaints
- Checking references, ensuring safe working practices, monitoring and managing staff access to systems and facilities and staff absences, administration and assessments
- Monitoring staff conduct, disciplinary matters
- Marketing our business
- Improving our services through knowledge of what is used and how

Any and all information passed to us by any third party will be treated in accordance with this policy.

Personal Data

This is defined as information relating to identifiable individuals, clients, suppliers, marketing contacts, job applicants, current and former employees, agency, contract and other staff.

The type of personal data we may gather might include: individuals' contact details, educational background, financial and pay details, details of certificates and diplomas, education and skills, marital status, nationality, job title, and CV.

Sensitive Data

This is defined as personal data about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offences, or related proceedings. Any use of sensitive personal data will be strictly controlled in accordance with this policy.

Application of Policy

This policy applies to all of our staff and we will ensure that they are familiar with this policy and comply with its terms.

We may supplement or amend this policy by additional policies and guidelines from time to time. Any new or modified policy will be circulated to staff before being adopted.

Responsibility for this policy?

Our Managing Director, Howard Josephs, has overall responsibility for the day-to-day implementation of this policy.

Our procedures

Fair and lawful processing

We will always seek to process personal data fairly and lawfully in accordance with the rights of the individuals'. This generally means that we will not process personal data unless the individual whose details we are processing has consented to this happening.

The processing of all data must be:

- Necessary to deliver our services and the services that we deliver on behalf of our clients
- In our legitimate interests and not unduly prejudice the individual's privacy
- In most cases this provision will apply to routine business data processing activities

Sensitive personal data

In most cases where we process sensitive personal data we will require the data subject's *explicit* consent to do this unless exceptional circumstances apply or we are required to do this by law (e.g. to comply with legal obligations to ensure health and safety at work). Any such consent will need to clearly identify what the relevant data is, why it is being processed and to whom it will be disclosed.

Accuracy and relevance

We will seek to ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform the Managing Director, Howard Josephs at the above address.

Your personal data

You must take reasonable steps to ensure that personal data we hold about you is accurate and updated as required. For example, if your personal circumstances change, please inform the Managing Director, Howard Josephs at the above address so that we can update our records.

Data security

We keep personal data secure against loss or misuse. We are committed to protecting the confidentiality of your information and will take all reasonable measures to secure your information, including encryption, third party audits, access controls and security testing.

Where other organisations process personal data as a service on our behalf, our Managing Director, Howard Josephs will establish what, if any, additional specific data security arrangements need to be implemented in contracts with those third party organisations.

Storing data securely

- In cases when data is stored on printed paper, it will be kept in a secure place where unauthorised personnel cannot access it.
- Printed data will be shredded when it is no longer needed.
- Data stored on a computer will be protected by strong passwords.
- The Managing Director, Howard Josephs, will approve any cloud used to store data.
- Servers containing personal data will be kept in a secure location, away from general office space.
- Data will be regularly backed up in line with the company's backup procedures.
- Data will never be saved directly to mobile devices such as laptops, tablets or smartphones.
- All servers containing sensitive data will be approved and protected by security software and strong firewall.

Transferring data internationally

There are restrictions on international transfers of personal data. Your personal data will not be transferred anywhere outside the UK without first consulting the Managing Director, Howard Josephs.

Processing data in accordance with the individual's rights

We will abide by any request from an individual not to use their personal data for direct marketing purposes and notify the Managing Director, Howard Josephs at the above address about any such request.

We will not send direct marketing material to anyone electronically (e.g. via email) unless they have given us positive consent to receiving our marketing material and that consent will be recorded and stored.

Training

Joiners will receive training as part of the induction process. Further training will be provided at least every year or whenever there is a substantial change in the law or our policy and procedure.

Training is provided through an in-house seminar on a regular basis. It will cover:

- The law relating to data protection
- Our data protection and related policies and procedures.

Completion of training is compulsory.

Privacy Notice

Being transparent and providing accessible information to individuals about how we will use their personal data is important for us. The following are details on how we collect data and what we will do with it:

Contact Us

Please contact our Managing Director, Howard Josephs at: See Research Ltd, Unit 113 The Record Hall, Baldwin's Gardens, London EC1N 7RJ

What information do we collect?

- Full name and job title
- IP address and other data associated with your computer
- Demographic information e.g. postcode
- Additional information provided by you may include:
 - Preferences and reminders
 - Home address
 - Telephone number
 - Mobile phone number
 - Date of birth
 - Payment and bank account information
 - Product or Service usage
 - Attitudinal information
- Automatically generated information created while you use this website may include:
 - Transactional information
 - Clickstream information
 - Cookies
 - Information e.g. e-codes and cinema codes created as a result of using this website

How is it collected?

We may collect personal data:

- When we meet you in person;
- When we speak to you by telephone;
- When you correspond with us by email;
- When you participate in any activities or promotions administered by us;
- When you fill in forms and questionnaires; or
- When you visit our website.

How will we use it?

We use the information we collect in order to understand your needs and provide you with a better service and in particular for the following purposes:

- Communicate with you and enable you to access the benefits and services of this website;
- Internal record keeping;
- To improve our products and services; provide relevant offers and fulfil transactions;
- Protect you, provide you with customer service, prevent fraud, operate this website on your behalf and respond to your request;

- To send promotional emails and updates about new products, special offers or other information we may think is of interest to you; and
- To contact you for market research purposes, we may contact you by email, phone or mail and we may use the information to customise the website according to your interests.

Who will your information be shared with?

Your personal data is an important part of our business. We do not sell your information to third parties. We will only share your information as set out below and with your express consent. All information sharing is only done on the basis of being necessary and to fulfil legitimate business purposes. For example:

- Payment card information may be shared with payment processors to facilitate card transactions
- Bank account information may be shared with our bank to facilitate payment into your account
- Information may be shared with third parties to fulfil our role, fulfil transactions including payment information, and shipping. If further consent is required to pass your personal data to third parties, you may be contacted in order to give your positive consent for this purpose.

We may disclose your personal information to third parties in limited circumstances as follows:

- Where we engage the business services of a third party to provide services directly to us. We will carry out the necessary due diligence on any third party that we use to ensure that they fully comply with data protection regulations. Any third party will be engaged for a specific purpose and they will be strictly prohibited from using your personal data for any other purposes. If we do share your personal information we will contact you to inform you of the identity of that third party and to gain positive consent to pass your personal data to the third party specified.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or in order to enforce or apply our terms of use on this website and other agreements.

We retain your data for

We will retain personal data for no longer than is necessary and in any event no longer than 6 months from the date of last usage. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained, but will be determined in a manner consistent with our data retention guidelines.

We will also need to take into consideration any regulations that we must fulfil, for example for auditing purposes or for legitimate business purposes and may retain your information after your relationship with us has ended.

Identity and contact details of any Data Controllers are

If you would like a copy of your personal data or would like us to correct any inaccurate information held about you please contact the Managing Director. Howard Josephs at the above address.

Marketing

We would like to send you information, from time to time about our products and services but we will only do so when we have your positive consent, which you can revoke at any time.

How do you access your data?

You have the right to access information held about you. If you would like a copy of your personal data, please contact the Managing Director. Howard Josephs at the above address.

You can ask us to correct any inaccurate information held about you by contacting us.

Consent

The personal data that we collect is subject to active consent by the data subject. This consent can be revoked at any time.

Legitimate Interest

We will process personal data collected in connection with our Surveys, Newsletters and Events as a necessary legitimate interest.

Data portability

Upon request, you will have the right to receive a copy of your data in a structured format. These requests will be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. You may also request that your data is transferred directly to another system. This will be done for free.

Right to be forgotten

You may request that any information held on you is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.

Privacy by design and default

Privacy by design is an approach to projects that promote privacy and data protection compliance from the start. The Managing Director. Howard Josephs at the above address will be responsible for conducting any Privacy Impact Assessments and ensuring that all IT projects commence with a privacy plan.

When relevant, and when it does not have a negative impact on the data subject, privacy settings will be set to the most private by default.

Data audit and register

Regular data audits to manage and mitigate risks will inform the data register. This contains information on what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.

Reporting breaches

All members of staff have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the Supervisory Authority (SA) of any compliance failures that are material either in their own right or as part of a pattern of failures

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Monitoring

Although we take every reasonable step to protect the information that you provide, we cannot guarantee the security or accuracy of the information that we gather. Please be assured that all our staff must observe this policy. The Managing Director, Howard Josephs has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to.

If you have any questions or concerns about anything in this policy, do not hesitate to contact Managing Director, Howard Josephs at the above address.

Links to other websites

Links on this website may take you to a third party website. At the point you enter the third party website, the privacy and cookie policy of the third party will apply to any and all information that you provide. It is important to read the third party's privacy and cookie policy.

Notification of changes to this policy

Our privacy and cookie policy will be reviewed and enhanced from time to time. Please check our website or contact us for a copy of the current privacy and cookie policy. If you are not happy with the conditions of a revised privacy and cookie policy you may opt out by contacting us at the above address.