

Survey Respondent Data Protection & Privacy Policy (21/05/2018)

Who are we?

We are **Engine Transformation Ltd** (formerly **ORC International Ltd**). We are a company registered in England and our registered office is at 60 Great Portland Street, London W1W 7RT, United Kingdom. We tell you below how to contact us.

How does this policy relate to you, and what is this policy about?

Thank you for taking the time to consider being a participant in one of our market research surveys. In order to help you decide whether to participate or not, this policy explains what personal data we will collect from you in relation to the survey and what we will do with it. Please read this policy in order to make sure that you are happy with it. We cannot carry out the survey without collecting personal data from you so, in order for you to be able to participate, it will be important for you to agree to the terms of this policy. We can only process your data by consent – participation in the survey is entirely voluntary but, if you do continue with the survey, then we will take it to mean that you agree with the terms of the policy. If you are not happy with the terms of this policy, then you should not participate in the survey. You may at any time withdraw your consent to our processing your personal data. To do so, you should use the contact details below.

Why do we carry out surveys, and where did we get your details?

We normally carry out surveys because we have been commissioned to do so by a client of ours. You may have been invited to participate in the survey because you already have a relationship with our client (for example, you may work for them or be a customer of theirs), in which case we may have obtained details relating to you from them. Otherwise, we may have obtained your details from a third party, such as a market research panel company. We may combine the details about you that have been given to us with personal data relating to you that we collect in relation to the survey.

What personal data do we collect in relation to our surveys?

We only collect personal data from you during the course of a survey to the extent that the personal data is relevant to the purpose of that survey. Unless we indicate otherwise in the survey (for example, to say that the personal data we are asking for is essential in order to enable us to carry out the survey), you may choose whether to share relevant personal data with us, or not.

When you participate in our survey, we may also collect usage data when you interact with our website (including log files about the nature of your access, such as your IP address, system versions, browser versions or time zones, Uniform Resource Locators (URLs), page response times, download errors, length of visits to certain pages and page interaction information).

What do we use your personal data for?

We may use your personal data for the following:

- For market research purposes, including in order to carry out analysis and produce reports on behalf of clients of ours who have commissioned us to carry out the market research.
- To help you while you participate in our surveys.
- To manage and develop the services that we provide.
- To check that our terms are being complied with and to enforce them when necessary.

In addition, if in relation to a particular survey we want to use your personal data for specific purposes not specified in this policy, we will explain those to you as part of the survey and, where appropriate, you will be asked for your consent (for example, by asking you to check a box).

How do we share your personal data with the person who has commissioned the survey?

In reporting on the results of our market research to the client who has commissioned it, unless we have agreed otherwise with you (see below), we will only use your personal data in aggregated, anonymous form. This means that you will not be personally identifiable from the data concerned. For example, if as part of the survey we have asked you to tell us how old you are, we might then explain in our report what percentage of the participants in the survey were in specified age brackets.

If we wish to share your personal data with the person commissioning the report in such a way that you can be identified from the personal data concerned, we will only do so after we have explained to you what we want to do and obtained your permission. Once we have your permission, we will then only disclose the relevant personal data in accordance with the permission that you have given.

Do we share your personal data with anyone else?

Where you contact us for help, depending on the time you may be put in contact with one of our associated companies (for example, in the US) who may then have access to your personal data to the extent necessary to enable them to provide you with the help you have requested.

We may share your personal data with other third parties where this is necessary to enable those third parties to provide services to us, such as tasks that support us in providing market research services. In each such case, we will retain control of the use of your personal data and we will have a contract with the third party which protects your personal data against unauthorised use or disclosure and allows the third party to use the personal data only in accordance with our instructions.

We may also share your personal data with others if we are required to do so by law or in any other circumstances where the applicable regulations specifically permit us to do so in the absence of your prior consent.

If any of our business is transferred to someone else (for example, because someone buys our business), then your personal data may be transferred as part of that transfer. If that involves someone other than us becoming the controller of your personal data, you will be informed within a reasonable time. In any case, anyone to whom your personal data is transferred will be required to continue to process it only in accordance with this policy.

How long will we keep your personal data?

We will keep your personal data for up to 2 years after the date on which we complete the survey in relation to which it was collected (unless we agree a longer period with you). After that, we will delete it and we will no longer have any copies of it. If, at any time, you withdraw your consent to our processing your personal data, then we will delete your personal data at that point and we will no longer have any copies of it (see below for more detail about how to withdraw your consent).

How secure is your personal data?

We are a global market research firm and we are committed to maintaining the privacy and security of your personal information according to the terms outlined in this policy. As members of various national industry authorities, such as, the European Society for Opinion and Marketing Research (ESOMAR) and the Market Research Society (UK), we have to comply with rigorous industry standards in relation to your privacy and the security of your personal information. We will take appropriate technical and organisational measures against unauthorised or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data, and we will make sure that any contractors of ours do so as well.

Where do we process your personal data?

We will normally process your personal data within the European Economic Area (“EEA”), except that it may sometimes be processed by staff operating outside the EEA who work for us or one of our associated companies (for example, if you ask for help out of hours, a member of our team in the United States may assist you). We have agreements in place to ensure they treat your data in an appropriate manner and so that your personal data is subject to appropriate protection.

What are your rights in relation to your personal data?

You may at any time withdraw your consent to our processing your personal data. To do so, you should use the contact details below. Once your consent is withdrawn, we shall not process your personal data any further and will delete it without retaining a copy. If you have previously consented to us disclosing it to a third party (other than on an aggregated, anonymous basis), we may not be able to stop them continuing to process it.

You have the right to access any personal data that we process relating to you. We may ask you to verify your identity before we provide access to the relevant personal data. You may also in appropriate circumstances have the right to restrict the processing of your personal data, or to portability of your personal data, if applicable.

We would like to ensure that your personal data is accurate and up to date. If any information that you have provided to us changes (for example, if you change your email address), please let us know.

If you are unhappy with the way in which we process your personal data or have any other complaint in relation to that processing, you are entitled to ask the Office of the Information Commissioner to review the matter. Details about your rights in relation to your personal data, and about how to contact the Office of the Information Commissioner are on their website at www.ico.org.uk.

How can you contact us?

You can contact us in relation to the processing of your personal data at dpo_uk@enginegroup.com or by using the contact details provided in the survey invitation or in the survey itself. Alternatively, you can use the ‘Contact’ page on our website for more ways of getting in touch.