

## **PRIVACY POLICY**

This Privacy Policy explains how we may Process your Personal Data. This Privacy Policy may be amended or updated from time to time, so please check it regularly for updates.

This Privacy Policy is issued by EXPERT INSIGHT (together, “we”, “us” and “our”) and is addressed to individuals outside our organisation with whom we interact, including customers, clients and visitors to our sites, and other users of our services (together, “you”).

This Privacy Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Privacy Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Privacy Policy.

### **COLLECTION**

We may collect or obtain Personal Data about you: directly from you (e.g., where you contact us); in the course of our relationship with you (e.g., if you make a purchase); when you make your Personal Data public (e.g., if you make a public post about us on social media); when you visit our Sites; when you register to use any of our Sites, or services; or when you interact with any third party content or advertising on a Site. We may also receive Personal Data about you from third parties (e.g., law enforcement authorities).

Collection of Personal Data: We may collect Personal Data about you from the following sources:

- Data you provide: We may obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone).
- Relationship data: We may collect or obtain your Personal Data in the ordinary course of our relationship with you (e.g., we provide a service to you, or to your employer).
- Data you make public: We may collect or obtain your Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media or business networking profile(s)).
- Site data: We may collect or obtain your Personal Data when you visit any of our Sites or use any features or resources available on or through a Site.
- Third party information: We may collect or obtain your Personal Data from third parties who provide it to us (e.g., law enforcement authorities; etc.).

### **DATA CREATION**

We may create Personal Data about you (e.g., records of your interactions with us). We may also create Personal Data about you, such as records of your interactions with us or our clients.

## **CATEGORIES**

We may Process: your personal details (e.g., your name, biographical information); demographic data; your contact details (e.g., your address); records of your consents; payment details; information about our Sites (e.g., the type of device you are using); details of your employer (where relevant); information about your interactions with our content or advertising; and any views or opinions you provide to us.

We may Process the following categories of Personal Data about you:

- Personal details: given name(s); preferred name; and photograph (if provided).
- Demographic information: date of birth; salutation; title; and language preferences.
- Contact details: address; telephone number; email address; and details of your public business networking profile(s) or online biographies.
- Consent records: records of any consents you may have given, together with the date and time, means of consent and any related information (e.g., the subject matter of the consent).
- Payment details: invoice records; payment records; billing address; payment method; bank account number; card or account security details; SWIFT details; IBAN details; payment amount; and payment date.
- Data relating to our Sites: device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Site; username; password; security login details; usage data; aggregate statistical information; internet service provider (ISP) details; referring and exit pages; and clickstream data.
- Employer details: where you interact with us in your capacity as an employee, the name, address, telephone number and email address of your employer, to the extent relevant.
- Views and opinions: any views and opinions that you choose to send to us, or publicly post about us on social media platforms.

## **LEGAL BASIS**

We may Process your Personal Data where: you have given your prior, express consent; the Processing is necessary for a contract between you and us; the Processing is required by applicable law; the Processing is necessary to protect the vital interests of any individual; or where we have a valid legitimate interest in the Processing.

In Processing your Personal Data in connection with the purposes set out in this Privacy Policy, we may rely on one or more of the following legal bases, depending on the circumstances:

- Consent: We may Process your Personal Data where we have obtained your prior, express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);
- Contractual necessity: We may Process your Personal Data where the Processing is necessary in connection with any contract that you may enter into with us (for instance if you are a client);
- Compliance with applicable law: We may Process your Personal Data where the Processing is required by applicable law;
- Vital interests: We may Process your Personal Data where the Processing is necessary to protect the vital interests of any individual; or
- Legitimate interests: We may Process your Personal Data where we have a legitimate interest in the Processing. The balancing test we have conducted in each case is as follows: o we have ensured that the Processing is lawful, proportionate, and conducted in accordance with the terms of this Privacy Policy; o we have ensured that we have a legitimate business need to perform the Processing; and o we have ensured that there is no material likelihood of any adverse impact on your interests, fundamental rights, or freedoms, as a result of the Processing.

## **SENSITIVE PERSONAL DATA**

We do not seek to collect or otherwise Process your Sensitive Personal Data. Where we need to Process your Sensitive Personal Data for a legitimate purpose, we do so in accordance with applicable law.

We do not seek to collect or otherwise Process Sensitive Personal Data in the ordinary course of our business. Where it becomes necessary to Process your Sensitive Personal Data for any reason, we rely on one of the following legal bases:

- Compliance: We may Process your Sensitive Personal Data where the Processing is required or permitted by applicable law (e.g., to comply with our diversity reporting obligations);
- Detection: We may Process your Sensitive Personal Data where the Processing is necessary for the detection or prevention of crime (including the prevention of fraud);
- Legal rights: We may Process your Sensitive Personal Data where the Processing is necessary for the establishment, exercise or defense of legal rights; or
- Consent: We may Process your Sensitive Personal Data where we have, in accordance with applicable law, obtained your prior, express consent prior to Processing your Sensitive Personal Data (this legal basis is only used in

relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

If you provide Sensitive Personal Data to us, you must ensure that it is lawful for you to disclose such data to us, including ensuring that one of the legal bases set out above is available to us with respect to the Processing of those Sensitive Personal Data.

## **PURPOSES**

We may Process your Personal Data for the following purposes: providing services to you; compliance checks; operating our Sites; communicating with you; managing our IT systems; financial management; conducting surveys; ensuring the security of our premises and systems; conducting investigations where necessary; compliance with applicable law; and improving our Sites, and services.

We may Process your Personal Data for the following purposes, subject to applicable law:

- Provision of services: providing our Sites or services; providing services on request; and communicating with you in relation to those services.
- Our Sites: operating and managing our Sites; providing content to you; displaying advertising and other information to you; communicating and interacting with you via our Sites; and notifying you of changes to any of our Sites, or our services.
- Communications: communicating with you via any means (including via email, telephone, text message, social media, post or in person) information in which you may be interested (e.g., information relevant to you as a client), subject to ensuring that such communications are provided to you in compliance with applicable law; maintaining and updating your contact information where appropriate; and obtaining your prior, opt-in consent where required.
- Communications and IT operations: management of our communications systems; operation of IT security systems; and IT security audits.
- Financial management: sales; finance; corporate audit; and vendor management.
- Surveys: engaging with you for the purposes of obtaining your views on our services.
- Security: physical security of our premises (including records of visits to our premises; and CCTV recordings); and electronic security (including login records and access details).
- Investigations: detecting, investigating and preventing breaches of policy, fraud, and violations of law, in accordance with applicable law.

- Legal proceedings: establishing, exercising and defending legal rights.
- Legal compliance: compliance with our legal and regulatory obligations under applicable law.
- Improving our Sites, services: identifying issues with our Sites, or our services; planning improvements to our Sites, or our services; and creating new Sites, or services.
- Recruitment and job applications: recruitment activities; advertising of positions; interview activities; analysis of suitability for the relevant position; records of hiring decisions; offer details; and acceptance details.

## **DISCLOSURES**

We may disclose your Personal Data to: legal and regulatory authorities; our external advisors; our Processors; any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; any purchaser of our business; and any third-party providers of advertising, plugins or content used on our Sites.

We may disclose your Personal Data to other entities within us, for legitimate business purposes (including operating our Sites, and providing services to you), in accordance with applicable law. In addition, we may disclose your Personal Data to:

- you and, where appropriate, your appointed representatives;
- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, lawyers and other outside professional advisors, subject to binding contractual obligations of confidentiality;
- third party Processors (such as payment services providers; survey partners, marketing outreach providers, cloud service providers, etc.), located anywhere in the world, subject to the requirements noted below in this provision;
- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- any relevant party if we believe disclosure is necessary and appropriate to prevent physical, financial, or other harm, injury, or loss;
- any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and

- any relevant third-party provider, where our Sites use third party advertising, plugins or content. If you choose to interact with any such advertising, plugins or content, your Personal Data may be shared with the relevant third-party provider. We recommend that you review that third party's privacy policy before interacting with its advertising, plugins or content.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

## **SECURITY**

We implement appropriate technical and organisational security measures to protect your Personal Data. Please ensure that any Personal Data that you send to us are sent securely.

We have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the internet – any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us are sent securely.

## **ACCURACY**

We take every reasonable step to ensure that your Personal Data are kept accurate and up-to-date and are erased or rectified if we become aware of inaccuracies.

We take every reasonable step to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

## **MINIMISATION**

We take every reasonable step to limit the volume of your Personal Data that we Process to what is necessary.

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably necessary in connection with the purposes set out in this Privacy Policy.

## **RETENTION**

We take every reasonable step to ensure that your Personal Data are only retained for as long as they are needed in connection with a lawful purpose.

We take every reasonable step to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Privacy Policy. The criteria for determining the duration for which we will retain your Personal Data are as follows:

We will retain copies of your Personal Data in a form that permits identification only for as long as: (a) we maintain an ongoing relationship with you; or (b) your Personal Data are necessary in connection with the lawful purposes set out in this Privacy Policy, for which we have a valid legal basis (e.g., where we have a legitimate interest in processing your data for the purposes of operating our business and fulfilling our obligations under a contract).

## **CONTACT DETAILS**

You may contact us at via post, telephone, email or via our online Contact Us form. If you have any comments, questions or concerns about any of the information in this Privacy Policy, or any other issues relating to the Processing of Personal Data carried out by us, or on our behalf, please contact:

The Expert Insight

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