

# **grasp business development ltd**

## **Data Protection Policy & Privacy Information Notice**

### **Goals of the data protection policy**

Depict our data protection activities in one summarising document for internal use and external use (e.g. as the basis for statutory data protection inspections including by customers/partners within the scope of commissioned processing). Ensuring our compliance with the European General Data Protection Regulation (GDPR) whilst also providing proof of compliance.

### **Why do we want a robust data protection policy?**

We are a small market research and category development consultancy, we stand or fall on the confidence of our clients and the trust of our research participants. We need to be legally compliant and we need to be ethical in the way we operate.

### **Why do we hold personal information?**

We process and hold personal information solely to facilitate our work in market research and category development consultancy. Almost all of this information is held electronically for efficiency. The lawful basis for holding information is through both consent (for customer/shopper/consumer market research purposes) and as a legitimate interest (holding business data for broader business development purposes). In terms of the latter, the personal information we hold is purely for the purpose of directing business development activity for grasp and our clients, it is necessary to hold data for that purpose but we do so with balance: our holding and use of personal information must be lawful, fair & transparent and it must not override individuals' interests, rights or freedoms. We actively discourage the use of any information we provide to clients in hard sales activities: directing clients towards softer, marketing-led activities.

### **Security policy**

Robin Norton - one of our two Directors - is the Data Protection Officer (DPO) for the company and his contact details are at the bottom of this document.

- Our goals are to keep records safely. The vast majority of our information is held on password protected laptops that time-out when unattended. The laptops in use most of the time are MacBooks, partly a deliberate choice for their enhanced security (including our ability to retrieve them if they are lost / stolen). Laptops are kept securely (i.e. not left visible in vehicles when travelling). Back-up information is held on hard disks that are kept locked away on our business premises. Some information is held in printed form but again, this is kept locked away on our private business premises.

- Everyone we work with is responsible for Data Protection and we will strive to make this clear to partners and contractors through training, sensitisation and communication of our mutual obligations.
- As with all our work, we also strive for continuous improvement in our data protection management system.
- In our own marketing and selling activity we must use the data we hold sensitively. In dealing with members of the public through our market research activities we must act ethically and legally, protecting participants' data. In dealing with our clients/customers we must be able to advise them on the legal aspects of using personal data and only share data with them with a full understanding of how that data has been sourced and can be used.

### **What personal information do we hold?**

We have a **business contacts database** that is for our own use as a thinking tool. This data focusses on names, job titles, business names, addresses, email addresses and phone numbers. The bulk of this data is based upon either public domain sources (the trade press & websites) or from contact with grasp business development. Elements of this database are occasionally shared confidentially and on a need-to-know basis with clients in accordance with legal use. We have occasionally used this database for market research purposes, with opt-out options on each communication (e.g. via surveymonkey), we will keep such use under review but we are not currently planning any communications activity beyond sending Christmas cards to recent customers and established contacts.

We have a **supplier database** and **ad hoc project databases** (e.g. spreadsheets of respondent data from face-to-face surveys, online surveys, qualitative interviews and focus groups) that contain contact details of suppliers we have used in the past. The supplier database is for fieldworkers and research venues. This data is not shared with exterior parties. Elements of ad hoc project databases are only shared with clients on a need-to-know basis (e.g. names of fieldworkers and locations for but NO contact details).

We gather personal details for each primary research project. As a minimum where we are paying research participants, this involves capturing names and addresses (often emails & phone numbers) to prove that we have spoken with people for accountancy purposes. This can also include taking **video footage** or **photographing participants**. In these instances, participants are told the data is for internal use only. For one-to-one videos, participants sign consent forms alongside providing names & addresses and having the option of joining our facebook group. The categories of data here generally include names, phone numbers, email addresses, postal addresses and demographic details with some occasional attitudinal data.

Key partners often hold data on our behalf, these include: our recruiters for qualitative & online research, surveymonkey as an online survey platform, subcontractors/agencies & their workers for survey fieldwork and our accountants (on a need-to-know basis for accountancy purposes). We trust these partners to protect data and use it legally & ethically. If we find partners have breached this trust we will review our choice of partner.

All this information is held permanently, electronically and securely on laptop hard discs, back-up hard discs and (occasionally) some paper copies. Data does not leave the UK in an insecure format. Occasionally we work on international projects and share specific UK-based and UK-derived data with key clients on a highly selective basis and under UK-derived business terms.

## **Participants' right to question and withdraw**

Individuals and businesses can contact us to see what information we hold and request its' deletion. Individuals can also withdraw consent to material they have provided (e.g. video footage). Individuals and businesses can lodge a complaint with a supervisory authority (e.g. the Information Commissioners' Office). Individuals are under no statutory or contractual obligation to provide personal data, although there is a possibility that research participants cannot be offered incentives if they do not volunteer personal information that affords proof of their participation. We do not engage in automated decision making.

We can provide individuals with privacy information if they request this at the time we collect the personal data from them. This information is held on our website under "site terms". We aim to provide privacy information in this document as concisely, transparently, intelligibly, accessibly and clearly/plainly as possible. We review and update this document when necessary. If we start to use personal information for a new purpose we will update this information.

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### **Robin Norton**

Category Director - our Representative and Data Protection Officer

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