

INSERT SPACE

Privacy Policy - Survey & Market Research Participants, Clients & Job Applicants

1) Overview

Insert Space is a UK based company for market research, business consulting and prescriptive data analytics. This privacy notice provides information on how Insert Space generally collects and processes your personal data when you interact with us.

We conduct market research using scientific methods and we commit, in obtaining your co-operation, not to mislead you about the nature of the research or how the findings will be used. We obtain information about you when you complete a survey or participate in any other research project that we are running. Your responses will be treated as confidential unless you consent to being identified.

Personal data means any information about you which can be used to identify you as an individual. This excludes information where your personal data has been removed (anonymous data).

We regularly review our privacy policy and therefore encourage you to refer to this privacy notice on a regular basis.

We will ensure that all personal information supplied is held securely and in accordance with all applicable Data Protection legislation.

For the purposes of the General Data Protection Regulation (GDPR) (EU) 2016/679, the data controller is Insert Space.

Our contact points are as follows:

hello@insertspace.co.uk

+44 (0) 3301 332116

Data Protection Officer: Claire Bown

2) Categories of personal data

We collect, use, store, process, and transfer different types of personal data, depending on the collection purpose. We only collect data categories necessary for achieving a specific purpose. Personal data we collect includes, but is not limited to:

- Contact Data: first name, maiden name, surname, company name, job title / role, company email address and phone number, company billing address, delivery address, email address and telephone numbers

- **Employment Application Data:** information we collect from you if you apply for a job at Insert Space, for example, data concerning your professional life, information included in your CV, graduation or other relevant certificates, employers' references
- **Financial Data:** bank account and payment card details, details about payments to you or received from you, as well as details of products and services you have purchased from us
- **Internet Log-Data:** internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites, information about how you use our website, products and services, device identifiers such as mobile advertising IDs, cookie IDs (please also refer to our cookie policy in clause 7 of this document)
- **Marketing and Communications Data:** your preferences in receiving marketing materials from us and your preferred communication channels
- **Research Data:** refers to all types of personal data we collect from you in the course of your participation in our research activities. Research Data includes the following categories, as detailed the in the Ts&Cs and consent forms for the respective market research activity
- **Survey Data:** your answers to online, paper & pencil or telephone surveys, including socio-demographic information such as title, date of birth, age, gender, information regarding educational and income levels, occupation, marital status, number of children in household, etc.

3) What happens if you do not want to provide personal data?

Participation in our market research is always voluntary. You may stop participating and/or providing personal data at any time. If you withdraw your consent to the processing of your personal data or terminate your membership in a panel, you will no longer be eligible for studies and consequently, any future incentives and compensations we may offer to members and other participants.

If the processing of your personal data is necessary for the performance of a contract to which you are party to, and you fail to provide the necessary information, we may cancel our services under the contract. In this case, we will notify you in advance.

If the collection of your personal data is necessary to conclude an employment relationship with you and you fail to provide that data when requested, we may be unable to process your application.

4) Personal data we collect from you in our market research activities

In the following section we explain typical situations in which we collect personal data from or about you when you participate in our market research.

We may collect and process 'Research Data' from you when you participate in our market research activities, for example: answering surveys.

In any of the following scenarios, Insert Space is responsible as a data controller for the collection and processing of 'Internet Log-Data', whereas other parties may be responsible as controllers for other personal data concerning you.

4.1) Personal Data provided to us by our clients

We may receive your 'Contact Data' from a client company who commissioned us to conduct a survey on their behalf with a specific group of people. For example, a client could send us a list of its employees for this purpose. In this case, our client is the controller of your 'Contact Data'. Insert Space is the data controller of any data that is collected from you during the survey.

4.2) How we use your personal data as a market research participant

In general, we process your 'Research Data' in such a way that recipients are not able to identify you as an individual. We do not store your personal data with your survey responses. Typically, we combine the Research Data of several respondents and generate anonymous aggregated data.

In some cases, we may report the Research Data on a participant's level, using an internally assigned number or code. Recipients are not able to identify you based on these codes.

If there is a possibility that a recipient of the Research Data can identify you as an individual, either directly or by combining it with other data, we will inform you in advance and obtain your consent if required. If you do not consent we will not report your data on a participant level.

5) Personal data we collect from you outside of our market research activities

5.1) Personal Data provided by you through direct interactions

You may provide us with your Contact Data, User Account Data and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- visit or create a user account on the Insert Space website
- request or use our/our partner products or services
- enter into a contract with us or a partner
- apply for a job or position with us
- subscribe to our services or publications
- request marketing material
- enter a competition or promotion or take part in a customer feedback survey
- give us feedback or contact us

5.2) Publicly available sources

We may collect additional information (Contact Data) about you from other sources if you are a representative of an interested party or a prospect from publicly available sources or an existing client. Such sources are mainly, but not limited to, internet sources

such as professional networks like Linked.in and XING but also respective company websites and possibly other websites.

5.3) What we use your personal data for

We will only use your personal data for the purposes for which we collected it and for purposes compatible with the original collection purposes.

5.4) Communication with you as a business partner

We process your personal data if you are a potential customer of our products, an existing customer or a service provider for the establishment and performance of our business relationship with you.

If you register on our website to receive specific content, newsletters, or to attend webinars, or you contact us by email or otherwise, we will process your Contact Data and any information that you submit through our web forms or send us by email for the following purposes:

- in order to communicate with you about our services
- to let you know about our policies and terms
- to respond to your requests
- to invite you to participate in customer feedback surveys
- to organize events that you have registered for

We process your Contact Data, Financial Data, Internet Log-Data, and User Account Data to deliver our services to you and to better understand how you use our solutions.

5.5) Marketing consent

If you sign up or otherwise opt-in to receive invitations to our free webinars and events, thought-leadership articles, or product announcement emails, we will ask for your consent to use your email address for this purpose.

We may use your Contact Data, Internet Log-Data, and User Account Data to better understand what may be of interest to you and how this content is best presented to you.

We will obtain your opt-in consent before sharing your personal data with any third party for marketing purposes.

You may unsubscribe from marketing communications at any time by clicking the link to 'unsubscribe' at the bottom of any marketing email we have sent to you.

If you opt out of receiving such marketing communications, personal data provided to us as a result of a product/service purchase will still be processed.

5.6) Job applicants

If you apply for a position at Insert Space we collect Contact Data and Employment Application Data from you in order to make decisions about the possible conclusion of an employment contract.

Should we require further categories of your personal data in the course of the job

application process or intend to use this data for purposes other than those specified above, we will provide you all information in advance as required by law through an additional privacy notice.

6) Internet Log-Data

If you interact with our website or software applications including cloud based or online applications, we will automatically collect Internet Log-Data about your equipment, browsing actions and patterns.

We use Internet Log-Data to enhance the users' experience and improve the performance, user friendliness and security of the surveys and other solutions, and for quality assurance purposes.

We may also use Internet Log-Data to meet our internal and external audit requirements, information security purposes, or to protect or enforce our rights, privacy, safety, or property, or those of other persons. This includes the prevention and detection of fraud, disruptions to our services or IT systems. We may be required to use and retain personal data for legal and compliance reasons, such as the prevention, detection, or investigation of a crime, loss or IT security incident.

7) Cookies and similar technologies

We collect personal data about you by using cookies, server logs and other similar technologies if you interact with our website or software applications including cloud based or online applications. We may also receive such data if you visit other websites by means of our cookies and similar technologies.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or may not function properly.

8) Legal bases of processing

We will only process your personal data for the purposes described above. We process your personal data as permitted by law:

- with your consent for a specific purpose, for example, we typically obtain your consent when conducting our market research activities
- for preparation or performance of a contract with you, for example, if you are party to a contract as a client or an employee of Insert Space
- to comply with legal obligations, for example, if we are required to respond to requests by public authorities or in order to comply with tax law
- if necessary, to protect your vital interests, i.e., in life-threatening situations
- if necessary, for purposes of our legitimate interest (or those of a third party) and your interests and fundamental rights and freedoms do not override those interests. For

example, we base our processing on our legitimate interests when engaging our clients and protecting our systems.

9) Service providers and partners of Insert Space

If necessary and compatible with the purposes, we share personal data with:

- Service providers, such as but not limited to hosting companies, call-centres and IT-service providers who are contractually bound to use the data exclusively for our purposes and pursuant to our instructions
- Professional advisers and service providers acting as controllers in their own right or share responsibility for the personal data processing with us, such as insurance companies and accounting services
- Recipients who are subject to professional confidentiality, including lawyers, banks and external auditors

10) How we keep information accurate and secure

Insert Space makes reasonable efforts to keep personal information in its possession or control, which is used on an ongoing basis, accurate, complete, current and relevant, based on the most recent information available to us. We rely on you to help us keep your personal information accurate, complete and current by answering our questions honestly. Personally identifiable information collected will be kept for no longer than 12 months from project commencement unless stated specifically at the time of taking part.

11) Your legal rights

You may exercise your legal rights in relation to your personal data we are processing. Insert Space will respect your individual rights and will deal with your concerns adequately. Your rights include:

- Right to withdraw consent: where the processing of personal data is based on your consent, you may withdraw this consent at any time by following the procedures described in the respective consent form.
- Right to rectification: you may request the rectification of your personal data. We make reasonable efforts to keep personal data that are used on an ongoing basis, accurate, complete, current and relevant according to the most recent information available to us. In appropriate cases, we provide self-service internet portals where users have the possibility to review and rectify their personal data.
- Right to restriction: you may request us to restrict the processing of your personal data, if:
 - you contest the accuracy of your personal data for the period we need to verify the accuracy
 - the processing is unlawful, and you request the restriction of processing rather than erasure of your personal data,
 - we no longer need your personal data, but you require these to assert, exercise or defend a legal claim, or

- you object to the processing while we verify whether our legitimate grounds take precedence over yours.
- Right to access: you can request information from us about your personal data to ensure we process it lawfully. You can also request a copy of the personal data you provided us and is undergoing processing, free of charge. However, we reserve the right to charge a reasonable fee for each additional copy you may request.
- Right to transfer: at your request, we will transfer your personal data to you or a third party, where technically feasible, provided that the processing is based on your consent or necessary for the performance of a contract.
- Right to erasure: you may request us to delete your personal data, where:
 - the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed for
 - you have a right to object further processing of your personal data (see below) and execute this right to object to the processing
 - the processing is based on your consent, you withdraw your consent and there is no other legal ground for the processing
 - the personal data has been unlawfully processedunless the processing is deemed necessary:
 - for compliance with a legal obligation which requires processing from us
 - for statutory data retention requirements
 - for the establishment, exercise or defence of legal claims
- Right to object: you may object – at any time – to the processing of your personal data due to your situation, provided that the processing is not based on your consent but on our legitimate interests or those of a third party. In this event we shall no longer process your personal data, unless we can demonstrate compelling legitimate grounds and an overriding interest for the processing or for the establishment, exercise or defence of legal claims. If you object to the processing, please specify whether you wish the deletion of your personal data or the restriction of its processing by us.
- Right to lodge a complaint: In case of an alleged infringement of applicable privacy laws, you may lodge a complaint with the data protection supervisory authority in the country you live in or where the alleged infringement occurred.

Please note:

- Time period: We will try to fulfil your request within 30 days. However, the period may be extended due to specific reasons relating to the specific legal right or the complexity of your request, in which case we will inform you accordingly.
- Restriction of access: In certain situations, we may not be able to give you access to all or some of your personal data due to statutory provisions. If we deny your request for access, we will advise you of the reason for the refusal.
- What we may need from you: We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights) can be granted. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- Exercise your legal rights: In order to exercise your legal rights, please contact us in writing or text form, e.g. by email or letter. You may also address our Data Protection Officer directly.