

# PRIVACY NOTICE FOR SURVEY PARTICIPANTS

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our clients and survey participants, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to anyone completing a survey, whether online, during a face to face interview or a paper copy.

## A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

#### B) TYPES OF DATA HELD

We keep several categories of personal data on our survey participants in order to carry out effective and efficient processes. We keep this data in a paper file and we also hold the data within our computer systems.

Specifically, we hold the following types of data:

- a) personal details such as name, address, email address, phone numbers if you have indicated you wish to join our mailing list or enter a prize draw
- b) your gender, marital status, information of any disability you have or other medical information
- c) information on your race, religion, ethnicity, sexual orientation, for equality monitoring purposes

#### C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during the survey.

## D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to gain feedback on our services, and equality monitoring.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Effectively monitoring participants feedback and	Our legitimate interests
satisfaction	
Add your name to our mailing list	Formal consent
Improving our services	Our legitimate interests
Future business planning	Our legitimate interests
Ensuring our administrative and IT systems are secure	Our legitimate interests
and robust against unauthorised access	

## E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

We carry out processing activities using special category data:

a) for the purposes of equality monitoring

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

#### F) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for administration of contractual benefits and the carrying out of performance related procedures will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data is shared with third parties for the following reasons:

• Funders where there is a contractual obligation to share data (but we will ensure consent before sharing unless it is aggregated and used as anonymised information)

We may also share your data with third parties to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

## **G)** PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. All personal data and equality monitoring data is kept in secure IT systems and in locked filing cabinets with restricted access.

# H) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of our annual and operational purposes. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

Record	Recommended Retention Period
Satisfaction	2 years
Equality monitoring	2 years
Funder reports	2 years after end of contract

#### I) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

### J) PERSONAL RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed "Access to Data" below and in our separate policy on Subject Access Requests";
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

#### K) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

# L) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

# M) DATA PROTECTION COMPLIANCE

Our Data Protection Officer is:

- Claire Edwards
- <u>claire@equipequality.org.uk</u>
- 01788 863117