

NEWGATE RESEARCH PRIVACY POLICY

Introduction

This Privacy Policy for Newgate Research lets you know what personal information of yours we collect, what we do with it, who we will disclose it to and how you can access the personal information we hold about you. You can also find out here how to change inaccurate personal information and how to opt out of receiving communications from us.

It is important that you read this Privacy Policy together with any other Privacy Notices that we may provide on specific occasions when we are collecting or otherwise processing personal data about you so that you know how and why we are using it. This privacy policy supplements those other notices and is not intended to override them.

Newgate Research is part of Newgate Communications, a wholly owned subsidiary of SEC Newgate. We respect and uphold your rights under the Market Research Society Code of Conduct and follow the UK's General Data Protection Regulation. For more information about the Market Research Society code of conduct, please visit [here](#), for more information about General Data Protection Regulation, please visit [here](#).

What personal information about you does Newgate Research collect and hold?

Personal data, or personal information, means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Background data includes occupation, life stage, household makeup, and home ownership status. When you have given explicit consent, we may also ask for income level
- Contact Data includes address, email address, telephone numbers and suppression information.
- Survey Data includes the responses you give to any surveys we invite you to participate in, this may include opinion and feedback in relation to a number of ideas, products, proposals or issues.
- Special category data may also be collected as Survey Data in certain cases when you have provided explicit consent, this includes political opinion and cultural background

We may also collect, use and share anonymous Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data cannot be used directly or indirectly to reveal your identity. For example, we may aggregate your Survey Data to carry out market research and statistical research. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We would only collect sensitive or Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) or information about your income level, criminal convictions or offences with your explicit consent, and only if it were relevant to a survey, for example as part of the Survey Data.

When possible, you have the option of remaining anonymous or to use a pseudonym to be identified by. However, in certain circumstances, such as where we receive your contact details from a third party or where the research data itself may potentially allow for identification, this may not be practicable.

How does Newgate Research collect and hold your personal information?

Newgate Research will generally collect your personal information directly from you, or from one of our accredited fieldwork companies, in the course of you participating in our qualitative and/or quantitative research. Where practicable, we provide options to remain anonymous to use pseudonyms. In such cases we would typically process your data as you have granted us consent. If you would like to withdraw your consent, you can do so at any time by emailing privacy@secnewgate.com.

However, we may also from time to time collect personal information about you from third parties, such as an organisation, affiliate, or company of which you're a customer, member or employee in order to fulfil a contract to conduct research.

If your personal information is obtained indirectly, we will inform you as soon as practicable of this collection and the circumstances of collection within one month. This will often be as part of an invitation to participate in research.

We have put in place appropriate security measures to help prevent your personal data from being accidentally lost, used or accessed in an unauthorised way. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

What are the purposes for which Newgate Research uses, handles and discloses your personal information?

Newgate Research carries out research on behalf of its clients, and any data we present to the client is anonymised and so cannot be related back to you. We will only use your personal information for the purpose of conducting our research and analysing the results in accordance with this Privacy Policy.

We do not disclose your personal information to anyone except our authorised sub-processors that are required for our work to take place, for example, accredited fieldwork companies who need your data in order to schedule interviews with you on our behalf, or invite your participation in surveys.

The data processed on individuals is mostly collected based on participants consent. We will not use or disclose your personally identifiable information for the purpose of advertising, promotions or direct marketing activities without your explicit consent.

If you decline to participate in our research we will usually delete your data immediately, though in some circumstances we may keep your data in line with our retention period (outlined elsewhere in this document) and use your personal information to re-contact you for a research purpose if we have valid reasons to believe a genuine research concern warrants such re-contact. If you have participated in our research, we will only re-contact you if you were informed of this or we have valid reasons to believe a genuine research concern warrants such re-contact.

Who will Newgate Research disclose your personal information to?

We may need to share your personal data with other organisations from time to time, but we will maintain responsibility for what they do with your data and how it is processed. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil specified purposes in accordance with our instructions. When they no longer need your data to fulfil the service, they will dispose of the details in line with our procedures.

We have grouped together the third parties we use as follows:

- Service providers who process data for us, including accredited fieldwork companies, recruiting companies, and hosting providers
- Newgate Research Teams, including freelancers and staff based in other countries

If we provide any personal information about you to any such non-EEA Newgate Research Teams or Service Providers, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this privacy policy.

In the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them, or in the case of US based entities, we may alternatively ensure they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>).

Further details on the steps we take to protect your personal information, in these cases is available from us on request by emailing privacy@secnewgate.com.

Openness

You have the right to request access to, or erasure of, any personal information we hold about you. In addition, you may ask us to suspend processing your data or object to the processing taking place.

If we are processing your data on the basis of consent, you can withdraw this consent at any time, or if you believe that personal information, we hold about you is incorrect, incomplete or inaccurate, then you may request amendment of it.

You can enact these rights by emailing privacy@secnewgate.com. We will respond to your request in a reasonable time and endeavour to provide you with a suitable response. Please note that if you ask us to not contact you again, we will need to hold your contact information for this purpose.

Retention and Destruction of Personal Information

Newgate Research will destroy or de-identify your personal information as soon as practicable once it is no longer needed for the purpose for our research purposes. However, we may in certain circumstances be required by law to retain your personal information after our research has been completed. In this case your personal information will continue to be protected in accordance with this Policy. If we destroy personal information we will do so by taking reasonable steps and using up-to-date techniques and processes. Any interview recordings will be stored on a secure server folder, only accessible by the Newgate Research team, for six months, after which they will be deleted.

Questions and Complaints

If you have any questions about this Privacy Policy or believe that we have at any time failed to keep one of our commitments to you to handle your personal information in the manner required by the Market Research Society Code of Conduct, then we ask that you contact us immediately using the following contact details:

Federico Vecchio.
SEC Newgate S.p.A.
Sky Light City Tower
50 Basinghall Street
London
EC2V 5DE

[Email – privacy@secnewgate.com](mailto:privacy@secnewgate.com)

We will respond and advise whether we agree with your complaint or not. If we do not agree, we will provide reasons. If we do agree, we will advise what (if any) action we consider it appropriate to take in response. In the unlikely event that you feel that you need to complain about our use of your personal data, and we have not been able to resolve this internally you have a right to complain to the Information Commissioners Office.

Information Commissioner's Office

Wycliffe House, Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk
Tel: 0303 123 1113
Tel:029 2067 8400 (calls in Welsh)

[Email: casework@ico.org.uk](mailto:casework@ico.org.uk)

Newgate Communications Website

When visiting the Newgate Communications website, the site server makes a record of the visit and logs the following information for statistical and administrative purposes:

- The user's server address – to consider the users who use the site regularly and tailor the site to their interests and requirements;
- The date and time of the visit to the site – this is important for identifying the website's busy times and ensuring maintenance on the site is conducted outside these periods;
- Pages accessed and documents downloaded – this indicates to Newgate Communications which pages or documents are most important to users and also helps identify important information that may be difficult to find;
- Duration of the visit – this indicates to us how interesting and informative the Newgate Research site is to candidates; the type of browser used – this is important for browser specific coding; and
- In order to optimise the Newgate Communications website and better understand its usage, we collect the visiting domain name or IP address, Computer Operating System, Browser Type and Screen Resolution.
- A cookie is a piece of information that an Internet website sends to your browser when you access information at that site. Cookies are either stored in memory (session cookies) or placed on your hard disk (persistent cookies). The Newgate Communications web site does not use persistent cookies.

Upon closing your browser, the session cookie set by this website is destroyed and no Personal Information is maintained which might identify you should you visit our website at a later date.

Newgate Research will take reasonable steps to protect your personally identifiable information as you transmit your information from your computer to our website and to protect such information from loss, misuse, and unauthorised access, use, modification, disclosure, alteration, or destruction.

However, you should keep in mind that the transmission of information over the Internet is not completely secure or error-free. In particular, email sent to or from this website may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.