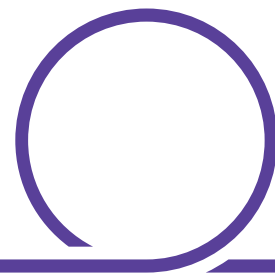




Privacy Notice

December 2019



1. Introduction

The Data Protection Act 2018 makes the UK's data protection laws fit for the digital age, when an ever increasing amount of data is being processed. It empowers people to take control of their data and supports UK businesses and organisations through this change. The Act provides a comprehensive and modern framework for data protection in the UK, with stronger sanctions for malpractice. It sets new standards for protecting general data, in accordance with the General Data Protection Regulations (GDPR), giving people more control over use of their data, and providing them with new rights to move or control personal data.

The Information Commissioners Office (ICO) is the UK's independent body set up to uphold information rights. Legacy Foresight Limited is registered with the UK Information Commissioners Office as a Market Research/ Research Organisation with the registration reference ZA145723.

Purpose

This document sets out how Legacy Foresight and its Associates will seek to ensure compliance with the legislation when we undertake market research and when we market our services to current and potential clients. Throughout this Privacy Notice Legacy Foresight is also referred to as 'we', 'our' and 'us'.

Application

This policy applies to Legacy Foresight's dealings with respondents, clients and third parties that may be involved in processing 'personal information'. It covers the way personal information will be obtained, used, shared, physically stored and destroyed.

2. Our commitment to the principles of the Data Protection Act

The Data Protection Act 2018 governs the processing (i.e. obtaining, holding, organising, recording, retrieval, use, disclosure, transmission, combination and destruction) of personal and sensitive data (i.e. information relating to a living individual - the data subject) and sets out the rights of individuals whose information is processed in manual or electronic form or held in a structured filing system. At Legacy Foresight we follow and fully support six principles that describe the legal obligations we have as an organisation that handles personal information about individuals.

1. Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the individual.

The information we gather about an individual will be collected in a way where they are fully informed how we intend to use that information, for what purposes and how we will share it.

2. Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

We will explain why we need the information we are collecting and not use it other than for those purposes.

3. Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

We will only collect the information we need to provide the services required.

4. Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

The information we collect will be accurate and where necessary kept up to date. Inaccurate information will be removed or rectified as we become aware of the changes.

5. Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Data Protection Act in order to safeguard the rights and freedoms of individuals.

We will not hold information for longer than is necessary.

6. Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

We will make sure that the personal information we hold is held securely to ensure that it does not become inadvertently available to other organisations or individuals.

3. Handling personal information for research purposes

When we undertake research that collects or evaluates personal information about a living person who can be identified from the information they have provided we aim to ensure that respondents and potential respondents are aware of the purpose or purposes for which the information is to be used and they have a choice as to whether to provide the information.

1. A respondent can ask for confirmation of the source of their personal information;
2. Personal information is not used in ways that would have adverse effects on individuals;
3. Respondents are provided with easy to read and understand informed consent sheets when information is collected;
4. Personal information will only be handled in ways that individuals would reasonably expect;
5. The third-party providers we work with to provide potential respondents must comply with the requirements of the Data Protection Act as well;
6. We seek to uphold the individual's rights with regard to their personal information.

Appropriate records will be maintained to demonstrate compliance with the above-mentioned requirements.

4. Handling personal information for marketing purposes

This section of Legacy Foresight's privacy policy applies to our collection and use of your personal data in connection to our marketing and the provision of our products and services.

How we collect information from you

You may provide us with your personal data, either on our website by completing and submitting forms, or interacting with us at events and conferences. The data we will collect is limited to your contact information, information about your organisation and information about your professional interests. We may also collect data about you from third parties and information from publicly available sources, like LinkedIn or your organisation's website.

Why we collect personal data

- Information requests: We'll send you any information you request about us and the services we offer.
- Marketing communications: We may send you marketing information we believe is relevant and of interest to you. This may include promotions, news and information, event invitations and details of new products and services. We may send these via email or post, call your organisation or show you advertisements on our website and others.
- Client services: If you're a client, we may use your personal data to provide services you commission from us and in connection with payments for those services.
- To improve our products and services: We use aggregated and personal data about you and your use of our website for our email marketing and our advertising. We do this using a variety of data sources— web analytics data, email data, and data about how you interact with Legacy Foresight.
- We will process your personal data for the purposes of our legitimate interests. These include the improvement of products and services, to fulfil our interest in creating an offering for you to use and the sending of direct marketing communications that we have identified that are likely to be of interest to you.

Our Website

- We don't use cookies to collect contact or marketing information about our site visitors. We just use two separate cookies - one purely to help with keeping the site secure and one to check if access to the website is made via a mobile phone. You can disable cookies by accessing the 'help' menu on your browser, but this may restrict your use of the website or affect the way in which it operates.
- We use tracking software to monitor visitors to our website and better understand how they use it, including Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read [Google's privacy policy](#) for further information.
- We always aim to include quality, safe and relevant external links but we cannot verify the contents of any externally linked website.

How we use your data

Email marketing and newsletter

- Our email newsletter provides updates on industry news, our products and services, and other similar information.
- You can subscribe on our website, by phone, email or in person.
- Subscriptions are taken in compliance with UK Spam Laws detailed in the Privacy and Electronic Communications Regulations 2003.
- All personal details relating to subscriptions are held securely and in accordance with the Data Protection Act 2018 and the General Data Protection Regulations. You may request a copy of personal information held about you by Legacy Foresight's email newsletter programme. A small fee may be payable. If you would like a copy of the information held about you, please request this by writing to us by email or post.
- In compliance with UK Spam Laws and the Privacy and Electronic Communications Regulations 2003 subscribers are given the opportunity to un-subscribe at any time through an automated system. This process is detailed at the footer of each email campaign. If an automated un-subscription system is unavailable clear instructions on how to un-subscribe will be detailed instead.

Social media platforms

- Any communications, engagement and actions through social media platforms are subject to the terms and conditions as well as the privacy policies held with each social media platform respectively.
- We advise you use social media platforms wisely, applying caution regarding your own privacy and personal details. We will never ask for personal or sensitive information through social media platforms.
- The Legacy Foresight website may use social sharing buttons which share content directly from web pages to a social media platform. Please note that the social media platform may track and save your request to share a web page through your social media account.
- Our website and social media platform accounts may share web links to relevant web pages. Some social media platforms shorten lengthy URLs and we use the link shortening platform Bitly. You can read [Bitly's privacy policy](#) for further information. We advise you to use good judgement before clicking any shortened URLs and to be aware that social media platforms are prone to spam and hacking. Our website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

5. Storing and destroying personal information securely

Data security

Legacy Foresight has appropriate security measures to prevent the personal information we hold being accidentally or deliberately compromised. We recognise that any breach of information security can cause real harm and distress to individuals if their personal information is lost or abused (this is sometimes linked to identity fraud).

- We are clear about everyone's responsibility for ensuring information security
- We make sure that the correct physical and technical security is in place, backed up by robust processes and procedures and reliable, well-trained staff
- We are ready to respond to any breach of security swiftly and effectively

Computer equipment, security and updates

We are aware of the vulnerability of laptops, phones and removable media and the business owners take steps to ensure the security of these devices.

We ensure that all equipment used as part of our business processes is appropriately protected and secured. The laptops we use are password protected to ensure that any personal information contained within them is appropriately secured. We ensure we operate with up to date Malware and anti-virus software, when updates are notified because of a software patch, these are applied as they become available.

Outsourcing

Legacy Foresight has procedures in place if we use third parties to process information. We require third parties to ensure that they have adequate security measures in place to secure the information that is being held. In addition to this:

- We only choose a data processor that provides guarantees about its security measures to protect the information and the processing it will carry out
- We take reasonable steps to check that those security measures are working effectively in practice; and
- We put in place a contract setting out what the data processor is allowed to do with the personal information or business information
- We notify any data controllers with whom we are working, who the proposed data processor will be.

Data loss

If any personal information is accidentally lost, altered or destroyed we will promptly attempt to recover it and prevent any damage or distress to the individuals concerned using the following methods:

- Containment and recovery – our response to the incident will include a recovery plan and, where necessary, procedures for damage limitation.
- Assessing the risks – we'll assess any risks and adverse consequences associated with the breach, as these are likely to affect how the breach needs to be contained.
- Notification of breaches – we'll inform the Information Commissioner's Office or other relevant Supervising Authority as necessary (within 72 hours), law enforcement agencies,

data controllers on whose behalf we are working and individuals (whose personal information is affected) about the security breach is an important part of managing the incident.

- Evaluation and response – we will investigate the causes of the breach, as well as, the effectiveness of controls to prevent future occurrence of similar incidents. This would include ensuring that any weaknesses highlighted by the information breach are rectified as soon as possible to prevent a recurrence of the incident.

Data retention

To comply with information retention best practice at Legacy Foresight we have established standard retention periods for different categories of information, keeping in mind any professional rules or regulatory requirements that apply and ensuring that those retention periods are being applied in practice. Any personal information that is no longer required will either be archived or deleted in a secure manner.

Our retention periods for different categories of personal information are based on individual business needs and contractual obligations.

We understand the difference between permanently deleting a record and archiving it. If a record is archived or stored offline, it will reduce its availability and the risk of misuse or mistake. If it is appropriate to delete a record from a live system, we'll also delete the record from any back-up of the information on that system, unless there are business reasons to retain back-ups or compensating controls in place.

Destruction of electronic records

All electronic files are destroyed by deletion and then the use of an electronic file shredder. This ensures that all electronic information is deleted permanently and cannot be recovered.

Secure disposal of records and computer equipment

Once the retention period expires or, if appropriate, the customer or business information is no longer required; paper records are securely disposed of. All paper records containing customer or business information as well as archived records are shredded.

All used computers, printers and any other electronic equipment that may contain or that will have stored customer or corporate information will be disposed of in an appropriate manner after the information has been wiped. An external provider will be used to ensure that the memory on the devices is completely clean of information before the item is disposed of.

6. Managing our data protection processes

Training

Here at Legacy Foresight we take our responsibilities with regards to training seriously. We know that having policies and procedures in place provides a solid base for our training programme and we aim to undertake training in accordance with the role and seek specialist advice as and when required. All training is documented and reviewed regularly.

Data Protection Officer

At this time we do not meet the requirements for a dedicated Data Protection Officer but this is kept under review as the type of work and range of clients/respondent's changes. We are committed to meeting the needs of the Data Protection Regulation and if our business requires a DPO, we will seek to appoint one.

Review

This policy will be reviewed periodically considering changing business priorities and practices and to consider any changes in legislation.