

## KSBR Brand Futures Limited Privacy Policy

In this policy “we”, “us” and “our” refers to KSBR Brand Futures Limited incorporated and registered in England and Wales with company number 5256864 and whose registered office is at 3 Port Hill, Hertford, Hertfordshire, SG14 1PJ.

### Our Commitment To Your Privacy

This privacy policy sets out how we use and protect any information that we collect from you or that you provide to us by phone, email, in written correspondence or in person. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. If you have any questions please do contact us at [dpo@ksbr.co.uk](mailto:dpo@ksbr.co.uk).

We take your privacy very seriously and are committed to ensuring that it is protected all times. Should we ask you to provide or confirm certain information by which you can be identified, then you can be reassured that it will only be used in accordance with this privacy statement.

We will collect, store and manage your information in an unbiased and secure way. We will only use data for the purposes that we have informed you about. We will always be transparent about the Personal data we collect and how we use and store it.

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

We may change this policy so please check this page from time to time to ensure that you are happy with any changes. This policy is effective from 15<sup>th</sup> August 2018.

### Who Are We?

We are a professional market research company conducting research and analysis on behalf of our clients which are corporate and public organisations, charities and NGOs. We always conduct our business to an agreed methodology and to best practice as enforced by our industry and professional body standards.

Our ICO, registration number is Z1525681.

For any data protection queries, please contact us at [dpo@ksbr.co.uk](mailto:dpo@ksbr.co.uk) or by post at:

Data Protection Officer  
KSBR Brand Futures Limited  
3 Port Hill,  
Hertford,  
Hertfordshire.  
SG14 1PJ

### Personal Information We Collect

The personal information we may collect from you will vary depending on the context of your interactions with us and the end purpose of our prescribed agreement with you.

We may collect, verify and process the following about you in order to understand your needs and provide you with a service which you may require:

- name;
- contact information including email address; home and / or business postal address; postcode plus mobile / landline phone number;
- details of your visits to our website including, but not limited to, traffic data, location data and other communication data;
- image and / or voice captured through photography, filming, videotaping and / or audio recording;
- any contact you have with us including queries and complaints may be recorded for internal record keeping purposes, to provide you with information that you request from us or which we feel may be of interest to you, notify you of changes to our service, improve our services and to customise our website to meet your needs;
- any other information which may be collected in the course of our interactions with you.

Please note that sometimes we will require you to provide additional information, and occasionally sensitive personal information such as your view on a political issue. If this is necessary we will advise you prior to collection for your agreement.

### How Do We Use Your Information

We use your information to:

- enable us to supply you with the services and information you have requested;
- analyse the information we collect so that we can administer, support, improve and develop the business and services we / our clients offer;
- provide you with access to certain parts of our website;
- conduct work consistent with the proper performance of our / our clients operations and business;
- contact you for your views on our products and services.

We may also email you regarding information or activities that we think may be of interest to you. If you do not want us to send you updates like this, please email [dpo@ksbr.co.uk](mailto:dpo@ksbr.co.uk)

### What Legal Grounds Do We Use For Processing Your Data

GDPR regulations as prescribed by data protection legislation / regulations requires us to rely on lawful grounds to use your personal information.

Having conducted a Legitimate Interest Assessment as prescribed under the Article 6 of GDPR we wish to exercise our right to use Legitimate Interest as the grounds for collecting and processing data "*processing is necessary for the legitimate interests pursued by the controller or a third party except where such rights are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child*".

We consider that the following are relevant to our business:

- where you have provided us to use your personal information to use in a certain way, e.g. participation in a focus group
- where there is a legitimate interest in us doing so if it is reasonably necessary to achieve our or another's interests (as long as that processing is fair, balanced and does not unduly impact your rights).

"*Legitimate interests*" means our interests in conducting and managing our business. For example, we have an interest in ensuring that our business activities are relevant for you, so we may process your information and send you invitations that are tailored to your interests.

When we process your personal information for our legitimate interests, we ensure that we consider and balance any potential impact on you (both positive and negative). Our legitimate interests do not automatically override your interests – we will not use your personal information for activities where our interests are overridden by the impact on you (unless you have instructed us to do so and as permitted by law).

If you do have any concerns about our processing you have the right to object, please email [dpo@ksbr.co.uk](mailto:dpo@ksbr.co.uk)

### How We Protect Your Information

We place great importance on the security of your personal information, We take the security and privacy of your personal information seriously and always take the appropriate precautions to protect it.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, managerial and security procedures to safeguard your personal data from unauthorised access use or disclosure and secure the information we collect.

We strive to protect your personal data, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we endeavour to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. As such we make no warranties as to the level of security afforded to your data, except that we will always act in accordance with the relevant UK and EU legislation and follow stringent procedures to ensure we work with all personal data in line with the General Data Protection Regulation / Data Protection Act 1998.

### Links To Other Sites

Our service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### How Long Do We Keep Your Information

The length of time we Hold your personal information depends upon the type of data and its use. We hold your personal information in our systems only for as long as necessary to provide the services and / or products that you have requested, or for such other essential purposes.

### Where Do We Store And Process Your Information

We only store and process your information within the UK and thus within the boundaries of the European Economic Area (EEA).

### Your Consent And Rights

When contacting you for the above purposes, unless you tell us otherwise We may do so by phone or email or any other way (electronic or otherwise).

You have the right to access any personal information you have provided to us and also you have the right to ask us not to process your personal data for market research purposes. You can exercise your right to prevent such processing by opting out during any communication. If you do not want us to use your data in this way you can contact us at any time by emailing [dpo@ksbr.co.uk](mailto:dpo@ksbr.co.uk).

You may request details of personal information we hold about you under current legislation and regulations. If you would like a copy of information held on you please email [dpo@ksbr.co.uk](mailto:dpo@ksbr.co.uk)

If you believe that any information we hold on you is incorrect or incomplete, please email [dpo@ksbr.co.uk](mailto:dpo@ksbr.co.uk) and we will adjust.

### Disclosure Of Your Information

We may process your personal information for certain direct marketing (on our behalf and on the behalf of our clients) which we believe may be of interest to you.

We may employ third party companies and individuals to facilitate our service, to provide the service on our behalf, to perform service-related services or to assist us in analysing how our service is used.

These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Whenever we or another processes your personal data for these purposes we will ensure that we always keep your Personal Data rights in high regards and take account of these rights. You have the right to object to this processing (email [dpo@ksbr.co.uk](mailto:dpo@ksbr.co.uk)). Please bear in mind that if you object this may affect our ability to carry out the tasks above for your benefit.

Due to the existing regulatory environment, we cannot ensure that all private communications and other personally identifiable information will never be disclosed in ways not otherwise described in this policy. We will only in exceptional circumstances pass on your information when we are legally required to do so.

We may be forced to disclose information to the government or third parties under certain circumstances, or third parties may intercept or access transmissions or private communications. We can (and you authorise us to) disclose any information about you to law enforcement or other government officials as we in our sole discretion, believe necessary or appropriate in connection with an investigation of fraud, intellectual property rights infringements, or other activity that is illegal or may expose us to legal liability.

We always place great importance on the security of your personal information and take appropriate precautions to protect it.

### Changes To Our Privacy Policy Or To Your Details

Any changes we make to our privacy policy in the future will be posted on our website and, where appropriate notified to you by email. Please revisit this policy each time you consider giving us access to your personal information.

We shall at all times comply with the Data Protection Act 1998, the Privacy and Communications Regulations 2003 and the General Data Protection Regulations 2018, as

amended, extended, re-enacted or replaced from time to time, and all applicable laws and regulations relating to the processing of personal data and privacy and the equivalent of any of the foregoing in any relevant jurisdiction.

### How to Contact KSBR Brand Futures Limited

We welcome your views, questions and comments about our privacy policy and website. You have the right to access any personal Information we hold on you. If you would like to contact us please do so by writing to – Data Protection Officer, KSBR Brand Futures Limited, 3 Port Hill, Hertford, Hertfordshire, SG14 1PJ. Telephone 01992 509797 or email [dpo@ksbr.co.uk](mailto:dpo@ksbr.co.uk).