

PRIVACY POLICY

This policy explains how Langwith Research ("we", "our" and "us") collects and processes personal data as a data controller.

OUR DETAILS

We are Langwith Research Limited (company number 14938238).

You can contact us by post to: Unit 5, 115 Gloucester Place, London, England, W1U 6JS

You can also contact our Data Protection Office (DPO) by email to: dpo@langwith-research.com

WHO CONTROLS YOUR PERSONAL DATA?

We are a data research company and sometimes we collect and process personal information on behalf of third parties (our customers) in accordance with their instructions. In such cases, our customer is a controller of the information we collect, and you will need to read the privacy policy of our customer for more information on how they process your information.

Usually, we collect personal data on behalf of customers and ourselves at the same time with the intention of using it for research purposes additional to those of our customer. In such cases, both we, and our customer, are controllers of the information collected and our privacy policy should be read alongside our customer's privacy policy.

Wherever possible when we collect personal data from individuals on behalf of a customer, we will aim to provide a link to our customer's privacy policy as well as our own.

HOW WE USE YOUR PERSONAL INFORMATION

The following table explains how we use your personal information in our business. Different sections apply depending on your relationship to us. Please read each section carefully as more than one section may apply to how we use your information.

Situation	Types of information	Purpose and lawful basis for processing
Participants in surveys or interviews		
You answer questions asked by us via WhatsApp or another electronic platform.	Name, contact information and any information provided by you in response to our questions. This will vary according to the nature of the interview and the answers you provide. In some cases this may include your political beliefs, or other sensitive personal data. You will be in control of the information you provide.	We will collect such personal data for research and data analysis purposes as determined by us, or one of our customers, or both, prior to setting up the survey or interview. The overall purpose of each survey or interview will be explained in any messages or other media inviting you to participate in the relevant survey or interview. Depending on the nature of the information we are seeking to collect and the questions we intend to ask, we will process such personal data either: <ul style="list-style-type: none">- on the ground that you have provided your express consent; or- on the ground that we have a legitimate interest in carrying out the processing described above, taking into account your rights
Customers (including prospective customers and employees / representatives of customers and prospective customers)		

<p>You send us an enquiry regarding our products and services.</p> <p>You purchase products or services from us.</p>	<p>Name, contact information, details of your enquiry, details of any products or services we agree to provide.</p>	<p>We process your information to:</p> <ul style="list-style-type: none"> - provide you with details of our products and services. - carry out pre-contractual steps relating to a potential contract between us (or between us and your organisation) - to supply goods or services to you (or your organisation) - to correspond and generally manage our relationship with you (or your organisation) - to keep a record of our contract with you or your organisation for administration, compliance or dispute resolution purposes - to help us efficiently administer our business. <p>We will process such personal data on the ground that we have a legitimate interest to carry out the activities outline above.</p> <p>If our contract is with you, we will process such personal data in order to perform the contract between us and you.</p>
<p>We send you marketing communications regarding our products and services.</p>	<p>Name, contact information, marketing preferences, profile</p>	<p>We send you marketing communications based on a legitimate interest of offering services that we think will be of benefit to you and it is up to you whether you wish to respond.</p>
<p>We monitor how users interact with our website through the use of cookies.</p>	<p>IP address, approximate location, details of pages visited and navigation activity.</p>	<p>After obtaining your consent to setting the cookies, we have a legitimate interest in monitoring how you interact with our website in order to improve it and to troubleshoot issues.</p>
<p>Suppliers (including prospective suppliers and employees / representatives of suppliers and prospective suppliers)</p>		
<p>You or your organisation supplies goods or services to us.</p>	<p>Name, contact information, job title, payment details, details of the goods/services supplied.</p>	<p>We process your information to:</p> <ul style="list-style-type: none"> - obtain details of your products and services. - carry out pre-contractual steps relating to a potential contract between us (or between us and your organisation) - to purchase goods or services from you (or your organisation) - to correspond and generally manage our relationship with you (or your organisation) - to keep a record of our contract with you or your organisation for administration, compliance or dispute resolution purposes - to help us efficiently administer our business. <p>If the contract is with you, the processing is necessary for us to perform our obligations under the contract.</p> <p>If the contract is with your organisation, then we have a legitimate interest in processing your personal information for the purposes listed above.</p>

HOW LONG WE KEEP YOUR INFORMATION FOR

We only keep your information for so long as is reasonably necessary. Generally speaking, we keep your personal information for the following periods of time:

- (a) **Interview or survey participants** – we keep personal data relating to interview or survey participants for no more than 12 years following completion of the survey and associated survey data analysis. We may keep aggregated, fully anonymised data derived from the results of the survey (from which all personal data has been completely removed) for much longer periods of time, which may be indefinite.
- (b) **Customers** – we keep personal data relating to customers (or their staff) for no longer than 12 years from the end of our business relationship with the customer, unless the customer has subscribed to a newsletter published by us or otherwise asked us to stay in contact for any reason.
- (c) **Suppliers** – we keep personal data relating to suppliers (or their staff) for no longer than 12 years from the end of our business relationship with the supplier, unless we have a need to stay in contact with them for a longer period.

WHO IS YOUR INFORMATION SHARED WITH?

We share your personal information with third parties only where we are required to do so to comply with the law, to protect our rights, to perform our contractual obligations or to efficiently operate our business. In order to achieve these purposes, we share your data with the following people or group of people:

- (a) If you are an employee or representative of a customer or supplier of ours then we may share your information with your employer and colleagues for the purpose of managing the business relationship between your organisation and us.
- (b) Our outsourced service providers. This includes IT service providers that store personal data processed by us, or help us to process it. For example, we use OpenAI to help us produce automated, interactive interview questions when we conduct surveys, and to help us collate the responses. These organisations have strict contractual obligations to handle your information in accordance with data protection law and to keep it confidential at all times.
- (c) Our professional advisers (including accountants and lawyers). These people are subject to professional duties of confidentiality.
- (d) Potential purchasers of our business may be given access to redacted information about our customers, suppliers and their staff/representatives. Before we share this information the potential purchaser would need to sign a non-disclosure agreement which protects your personal information.

Some of our IT service providers are located outside the UK and EEA. If the recipient of your information is based outside of the UK and EEA and is not based in a country which offers equivalent protections for personal data then your data will be safeguarded by a set of standard contractual clauses and/or an International Data Transfer Agreement approved by the UK government for the purposes of safeguarding international data transfers.

YOUR RIGHTS

Under UK and EU data protection law you have the following rights:

- (a) The right to be informed about what we do with your information. This Policy provides you with this information.
- (b) If we are processing your data on the basis of your consent then you have the right to withdraw that consent at any time. Consent can be withdrawn by notifying us using the details set out at the start of this policy. Consent to marketing communications can be withdrawn in the same way or by

following the steps outlined in that communication, such as clicking the 'unsubscribe' link in the marketing emails we send.

- (c) The right to access a copy of your information which we hold. This is called a 'data subject access request'. Additional details on how to exercise this right are set out in the 'Access to Information' section below.
- (d) The right to prevent us processing your information for direct marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data or by contacting us using the details set out at the start of this policy.
- (e) The right to object to decisions being made about you by automated means. We will inform you if your information is subject to automated processing. We use OpenAI to help us produce automated, interactive interview questions when we conduct surveys, and to help us collate the responses but we do not use artificial intelligence solutions to make decisions about you.
- (f) The right to object to us processing your personal information in certain other situations.
- (g) The right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate.
- (h) The right, in certain circumstances, to claim compensation for damages caused by us breaching data protection law.
- (i) The right, in certain circumstances, to request that we erase, rectify, cease processing and/or delete your information.

You have the general right to complain to us in the first instance if you are not happy with how we are processing your personal information. If you are not satisfied by our response then you can complain to the Information Commissioner's Office (ICO) via www.ico.org.uk.

ACCESS TO INFORMATION

Under UK and EU data protection law you can exercise your right of access by making a written request to receive copies of some of the information we hold on you. We may need to request proof of your identity, or proof of your authority (if making the request on behalf of someone else), before we can supply the information to you. Requests should be sent to us using the contact details set out at the start of this policy.

You do not need to pay a fee to exercise this right unless you are requesting copies of documents you already possess, in which case we may charge our reasonable administrative costs. We are also allowed to charge you for our reasonable administrative costs in collating and providing you with details of the requested information which we hold about you if your request is clearly unfounded or excessive. In very limited circumstances, we are entitled to refuse to comply with your request.

In certain circumstances, you are entitled to receive the information in a structured, commonly used and machine-readable form.

COOKIES

Our website sets the following cookies on your browser when you visit our site: (1) a "session cookie" to authenticate the user's requests against our servers and effectively keep the user logged in; (2) a "CSRF cookie" to prevent cross-site request- forgery attacks; and (3) on the embedded signup form, facebook adds a cookie.

CHANGES TO OUR PRIVACY POLICY

This notice was last updated in November 2023. Any changes we may make to our privacy policy will be uploaded to our website and if the change is significant then we will tell you about it by email or a WhatsApp message.