Community Privacy and Cookies Policy

Introduction

Human8 and its group of companies (Group) ("**we**" / "**our**" / "**us**") know how important your privacy is and will take great care to safeguard it. Our key principles are founded on honesty, objectivity, confidentiality and transparency.

Our Group means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in Section 1159 Companies Act 2006.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Our Client

We are running the Community on behalf of National Employment Savings Trust Corporation ("**Our Client**"), who is interested in hearing your views on matters that may influence the goods and services they offer.

Most of the information you provide to us through the Community will be processed and used in a manner and for purposes determined by our Client, as described in more details in the email you received to participate to the Community.

Where we process your data for our Client for their research project, for the purpose of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) and any legislation replacing or amending them, (Data Law) the data controller is The National Employment Savings Trust Corporation of 10 South Colonnade, E14 4PU, London, and we are a data processor for our Client.

However, apart from the research services we conduct for our Client, we need to process your data in order to run and maintain the Community and to administer the prize draw. In such instances we will process your data as an independent Data Controller as defined in the Data Law and the provisions of this Privacy policy shall apply to such processing only.

This policy (together with our terms of use https://yourway.square-community.io/footer/08e05e8a-bb6c-447c-ac21-6429e9de3e95 only applies to the website [Your Way] (the "**Community**") and sets out the basis on which we process personal data we collect from you, or that are provided to us or that you provide to us, which we require for the purpose of running the Community, including but not limited to communications with you to administer research tasks and any maintenance operation to ensure the community is running to a high standard. Personal data is information that identifies you and relates to you.

Information on the GDPR

Your new rights under the GDPR in relation to the personal data for which we are data controller are set out in this policy.

Who we are and what we do

We are a consumer insight agency. We run online communities and panels in which we invite consumers to share their views on our clients' businesses, products and services, on behalf of our clients. We offer our clients ancillary services to these communities such as analysis on global consumer trends which does not involve transfer of personal data.

Information we hold about you

We **collect information from you** which may include your name, address, private or corporate e-mail address, your phone number and any other information you choose to share with us.

You provide this information at different times, for example:

- at the time of registering to use the Community;
- by participating in surveys, polls or online discussions;
- participating in video recordings;
- by posting material in the Community;
- by submitting enquiries using the contact details posted in the Community;
- by asking us to update any out of date information which we may hold about you; and
- by participating in any other community activity requested by our Client or their partners.

We may also ask you for information if you report a problem with the Community.

We may also collect information about your computer (including where available your IP address, geographical location, operating system, browser type, referral source, length of visit and number of page views) for system administration and to report aggregate information to our Client in a summarised form. This is statistical data about our users' browsing actions and patterns and does not identify any individual. It is not personal data.

Information we obtain from other sources

We may initially obtain your personal data from other sources such as our Client (if you have given your contact details to them indicating that you are happy for your data to be shared with us for the purpose of the Community).

In this case we will inform you, by contacting you and bringing your attention to this privacy policy, within a maximum of 30 days of collecting the data, of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purposes we intend to retain and process your personal data.

If we have contacted you and you would like your name to be removed from our database, please follow the “unsubscribe me” procedure in our original email. We will remove you from our database as soon as reasonably practicable.

We are working closely with third parties including companies within our Group, business partners, sub-contractors in technical services, analytics providers. We may receive information about you from them for the purposes of our contract with our Client and ancillary support services.

Why we have your information and the reasons we use it

Under data protection law, when our Client is a data Controller, our Client must have a lawful basis for holding and processing your personal data (and allowing us to do so on our Client’s behalf) This is specified in the email that you received asking you whether you wanted to participate to the Community.

When we are an independent data controller, until such time as you agree to our Terms and Conditions of Use for the Community, we process your personal data for our legitimate business interests, which in our case are to fulfil the terms of our contract with our Client in respect of the Community. We need to balance our interests against your interests, fundamental rights and freedoms to ensure your personal data is processed fairly. When you join the Community you agree to Terms and Conditions of Use for the Community and a contract then exists between us and you for your access to the Community, and as an independent Data Controller we then process your personal data, to the extent this processing is necessary, for the performance of our contract with you.

We may also rely on legal obligation as set out in the GDPR if we are required to retain your personal data to fulfil a legal obligation.

We may also ask for your consent at the relevant time to participate in specific other activities connected to this Community, such as a video recording.

We do not use your personal information for our own marketing purposes and we do not transfer your personal data to third parties for the purposes of marketing.

Sensitive or Special Personal Data

Generally we do not collect sensitive (or special category) personal data and will only do so if you provide it to us and provide your express consent to our uses of that information. Sensitive or special personal data includes information relating to racial or ethnic origin, physical or mental health, sex life or political opinion. Please make sure that you do not share with us any sensitive personal data on the Community.

Our uses of your information

We may use the information we collect from you for the following purposes:

- to enter you into free prize draws, to contact you if you win and to send you any prizes;
- to run and maintain the Community;
- to provide you with information and services that you request from us;
- to help us improve our services, for example by acting on the information you provide us or to deal with any concerns or complaints you raise;
- to ensure that content from the Community is presented in the most effective manner for you and for your computer; and
- to notify you about changes to the Community or this Privacy Policy.

If you contact us, we may keep a record of that correspondence.

Disclosure of your information to other Community members, Our Client and third parties

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by communicating electronically with us in our online communities (which may be hosted by other websites, both within and outside of the EEA) you acknowledge our processing of personal data in this way.

If you participate in online surveys, polls or discussions or post material in the Community, your screen name and the information you post will only be visible to us, the other participants in the Community and to our Client. If you post any personally identifiable information yourself, we may at our discretion remove this for your own security. We recommend that you choose a screen name which does not resemble your real name.

As a data processor, we provide our Client with data files containing your answers to survey questions to help inform them about specific elements of their offer. Even if you do not complete a survey we may share any information from unfinished surveys or with incomplete answers with our Client. Any posts you make to a survey, poll or discussion in the Community will only be associated with your screen name. We may, on occasion, match your answers to other information held about you on our databases.

We work with third parties providing us with technical, services, and professional advisors. As data controller, we may disclose information about you to them for the purposes of their contract with us.

Where we are data controller:

- we may disclose your personal information to third parties in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets, but only for the purposes described in this Privacy Policy;

- we may disclose information in connection with any legal proceedings or prospective legal proceeding or if we are required to do so by the government or other law enforcement agencies or in connection with the investigation of unlawful activities;
- we may disclose such information to law enforcement authorities as we reasonably feel is necessary; and
- we also have the right to disclose your identity to any third party who is claiming that any material posted or uploaded by you to the Community constitutes a violation of their intellectual property rights or of their right to privacy.

Except as described in this Privacy and Cookies Policy, we will not disclose any of your personal information to any third party without your permission.

Retention of your Data

We understand our legal duty to retain accurate data and only retain personal data for as long as necessary. Accordingly, when we are data controller, we have a data retention policy and run regular data routines to remove data that we no longer have a lawful purpose to hold/process.

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- our contract with our Client;
- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- your instructions.

Personal data sent to us by our Client in order to recruit participants to the Community is deleted 90 days from use. Personal data which you choose to provide to us on joining the Community and during your participation in the Community is usually kept for the duration of the Community. However, from time to time we do remove data from inactive accounts. If you choose to unsubscribe from the Community we will pseudonymise your personal data. We aim to do this straightaway and in any event within 10 days of your request. Once the Community is closed down, your personal data will be removed. We aim to do this straightaway and in any event within 30 days of closure.

We may archive part or all of your personal data, deleting all or part of it from the Community database. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so. For your information, pseudonymised data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms

Your rights

You have the right to withdraw from taking part in the Community. If you no longer wish to be a member of the Community, you may request that your personal information be removed from our list of active members at any time by following the “unsubscribe me” procedures in our emails or on the Community website. Please note that failure to follow the correct procedure could delay the removal of your information. We will process your request as soon as reasonably practicable; however, there may be a gap between the time when we receive your request and the time when we are able to remove your information. Therefore, you may receive a few more emails before the request is processed.

You have the right to change your personal information that you submitted when joining the Community. You can amend the details we hold about you by contacting moderator.cat@insitessquare.com.

You have the right to ask us to destroy a record of your response to a survey, poll or discussion after you have submitted your post in the Community and we will ensure that your response is not used in our analysis provided that we have not already shared it with Our Client.

Please be aware that our Client may retain your personal information for other purposes which might mean your data is held for a different retention period(s). Our deletion of your personal data does not mean that our Client will also delete your personal data.

You have the right to make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: https://ico.org.uk/concerns/

Access to information

You have the right to access the information we hold about you. Requests should be sent via support@square-community.io.

Additional rights, subject to the GDPR:

The right to object to processing that is likely to cause or is causing damage or distress.

The right to object to decisions being taken by automatic means.

The right to have inaccurate personal data suppressed, rectified, blocked, erased or destroyed.

External websites

The Community may, from time to time, contain links to external websites. If you follow a link to any external websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

The use of cookies in our community

Cookies are small data files, applied by the majority of websites, which transfer text-only information to the hard drive of your computer.

The Community requires the use of cookies in order for it to work effectively. Some cookies are essential in order to enable you to move around the Community and use its features, such as enabling you to sign in to the Community. These cookies don't gather information about you that could be used for marketing or remembering where you have been on the internet. This category of cookies cannot be disabled. We also use cookies to improve user experience of the Community as well as to provide information to us.

The Community uses the following cookies:

Type	Name	Purpose	Description
Website Platform	jtd_eudir	Cookie Notification Check	This cookie is set to ensure that you are not repeatedly notified about the use of cookies on this website. This cookie is set immediately on your first visit to the Community.
has_js	JavaScript Check	This checks that the browser has JavaScript enabled and so will render the Community website correctly for you.	

		This cookie is set immediately upon visiting the Community.
Random unique ID	To allow logging in	This cookie stores a random ID which is used by the Community to remember which Community member you are, and therefore keep you logged in. This cookie is set immediately upon visiting the Community.

By using the Community you accept the use of cookies. You may control the cookies used by the Community by modifying the settings in your browser - view the help menu to change your cookie preferences. If cookies are disabled, this may mean that you are not able to take full advantage of all the features in the Community and the Community may not work effectively.

For more detailed information about cookies and how they can be managed and deleted please visit www.allaboutcookies.org

Security and storage of information collected

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (”EEA”). It may be transferred to third parties outside of the EEA for the purpose of our services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

We are committed to maintaining the security of the data we collect and take appropriate technical and organisational measures to prevent the loss, misuse or alteration of your personal information. Our employees or agents can only access data in the Community by use of an authorised user name and password and information you provide to the Community is stored on firewall protected servers. Unfortunately, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your data transmitted to the Community; any transmission is at your own risk.

You are responsible for keeping your Community password confidential. We ask you not to share your Community password with anyone.

Codes of conduct

We are committed to meeting the requirements of the following laws and codes:

1. All applicable data protection law including UK Data Protection Act 2018 and the GDPR.
2. Market Research Society's Regulations;
3. ICC/ESOMAR (International Chamber of Commerce/European Society for Opinion and Marketing Research) International Code on Marketing and Social Research Practice.

Changes to our Privacy and Cookies Policy

Any changes we may make to this Privacy and Cookies Policy in the future will be posted on the Community website. We will also contact you to notify you of changes.

How to contact us

If you have any questions or concerns about this Privacy Policy, or the use of your information, please visit support@square-community.io or write to us at:

Human8

The Hive

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