

Data Protection and Privacy Policy

May 2018

Our Commitment:

Media Minds Global, incorporating its subsidiary divisions, including travel Minds Global, is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the General Data Protection Regulation and the Data Protection Act (DPA) 2018.

Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements.

The member of staff responsible for data protection is Rob Read, Managing Director.

Media Minds is also committed to ensuring that its staff are aware of data protection policies, legal requirements and adequate training is provided to them.

The requirements of this policy are mandatory for all staff employed by Media Minds and any third party contracted to provide services to Media Minds.

Notification:

Media Minds Global is registered with the Information Commissioner's Office (ICO) for the processing of personal data: registration ZA293440.

Changes to the type of data processing activities being undertaken shall be notified to the ICO and details amended in the register.

Breaches of personal or sensitive data shall be notified immediately to the individual(s) concerned and the ICO.

Personal and Sensitive Data:

All data within Media Minds' control shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates.

The definitions of personal and sensitive data shall be as those published by the ICO for guidance: <https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

The principles of the Data Protection Act shall be applied to all data processed:

1. Processed fairly and lawfully
2. Obtained only for lawful purposes, and is not further used in any manner incompatible with those original purposes
3. Accurate and, where necessary, kept up to date

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4. Adequate, relevant and not excessive in relation to the purposes for which it is processed
5. Not kept for longer than is necessary for those purposes
6. Processed in accordance with the rights of data subjects under the DPA
7. Protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage
8. Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection of the personal information

Personal information we may collect

We may collect personal information on your visits to the Website including, but not limited to, your IP address, browser, timestamp, traffic data, location data, weblogs, content from surveys and contact forms and other communication data and the resources that you access. Our collection of this personal information will make your visit to the Website easier in the future as we will be able to suggest content that is relevant to you based on the location you access the Website from, what content you access and how you interact with it. We may also collect information for marketing purposes and analysis, including information on how you respond to email, sms, phone and other marketing campaigns.

We will collect any information you provide to us when you use our contact forms (for example "Contact", "Contact us today", "Send us a message", or "Contact us about working together"). The provision of your personal information via our contact forms is not a statutory or contractual requirement; however, please note that fields marked with an asterisk (*) are mandatory fields, because we need this information to comply with or respond to your request, or to improve your future experiences with us and our Website. Other information or personal information you share with us when completing our contact forms is at your sole discretion. If you contact us, we will keep a record of that correspondence.

Fields we may request include but are not limited to: your First name, Last name, Company name, Job title, Business email address, Telephone number, Number of permanent employees in the UK& Ireland, Job function, Job level, Industry, Biggest challenge, Your location, Sector, Have you ever worked with any of these brands?, Company registration number, Purpose of attendance (at an event). We use your personal information to send you direct marketing via email and other communication means when you opt-in for this purpose in the relevant contact form.

You may opt-out of receiving future marketing communications at any time by emailing research@mediamindsglobal.com

How we use your personal information

Your personal information will be collected and handled by us for the following purposes:

- to provide you with the services you expect us to.
- to best tailor content and resources according to your preferences.
- to respond to your request or questions when you contact us.
- with your consent we may also use your contact data for direct marketing to inform you about services/ products/events etc that might be of interest to you (we will communicate by email, telephone, mail and/ or other communication methods)
- to send to you other information – such as upcoming events or newsletters – that may be of interest to you.
- to help us create, publish, and improve content most relevant to you.
- to ensure that the content provided through the Website is presented in the most effective manner for you and for your device.
- to allow you to participate in interactive features of our Website, when you choose to do so.
- to further develop and improve the Website and systems to better serve you. This mainly takes place in the context of new IT systems and processes so that information about you may be used in the testing of those new IT systems and processes where dummy data cannot fully replicate the operation of the new IT system.
- to perform analytical research on our prospective client and candidate base, including the content, and the services/products they are interested in.
- to transfer data to third parties (see below) where necessary, to comply with any legal obligation.

and we may also process your information to:

- a. investigate or respond to incidents and complaints
- b. comply with obligations and rights and cooperate with investigations carried out by the police, government or regulators.

Legal provisions

Our use of your information as described above is permitted by applicable data protection law because it is:

- necessary for our legitimate interests in pursuing the purposes set out above, and such interests in each case not being overridden by your privacy interests;
- in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies;
- or in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal information, necessary for establishing, exercising or defending legal claims or where the processing relates to personal information manifestly in the public domain;

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- in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you opt-in to receive marketing communications and news, via email and other communication means.

Data retention

We will keep your personal data in connection with the services for which it was collected for an appropriate period of time and in accordance with our data retention policy.

In terms of personal data we use for marketing, we will keep this data for as long as we are able to market to you and if you withdraw your consent or opt-out of marketing communications, we will keep your contact details only to ensure that we do not contact you again for marketing purposes.

Sharing data with third parties

To facilitate our efficient use of your information, and to provide you with content and/or resources, or to fulfil a request you make of us, we disclose your information to third parties. However, this disclosure will only occur in the following circumstances:

- To suppliers, contractors and agents: from time to time we may engage or employ other companies and individuals to perform functions on our behalf. Examples include the hosting and/or maintaining of website content, or the provision of certain features contained on the Website, and the provision of marketing services. Such recipients will only have access to your personal information as required by them to perform their functions, and are not permitted to use such personal information for any other purposes. These recipients will be subject to contractual confidentiality obligations
- To government or law enforcement authorities if we determine in our sole discretion that we are under a legal obligation to do so.

IP addresses and cookies

We collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and we will not use it in isolation to identify you or any individual. If you provide us with personal data, such as your name, we will then match your IP address and browsing history (for example) with that personal data.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on your device. Cookies help us to improve the Website and to deliver better and more personalised content.

Transfer of data

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Your personal information can be transferred and processed in one or more other countries, in or outside the European Union. We shall only transfer your data outside the EU to countries which the European Commission believes offers an adequate level of protection to you.

Data Security

Although we will do our best to protect your personal information, you should be aware that the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal information transmitted to the Website or any third party; for this reason, any transmission is at your own risk. We will use strict operational procedures and adequate, technical and organisational security measures to prevent any unauthorised access, change, deletion or transmission of this personal information.

Your rights: how you can access, correct and delete your personal information

Under applicable data protection laws, you have the following rights:

- The right to be informed – you have the right to be told about the collection and use of the personal data you provide. This privacy policy sets out the purpose for which we process your personal data, how long we will keep your data, who we will share your data with.
- Right of access – you have the right to know whether we are processing your personal data, and to a copy of that data. We would need as much information as possible to enable us to locate your data. We will respond to your request within 28 days of receipt of your request.
- Right to rectification – you have the right to have any incorrect personal data corrected or completed if it is incomplete. You can make this request verbally or in writing. We will need as much information as possible to enable us to locate your data. We will look at any request and inform you of our decision within 28 days of receiving the request.
- Right to erasure – this right, often referred to as the right to be forgotten allows you to ask us to erase personal data where there is no valid reason for us to keep it. We will look at any request and inform you of our decision within 28 days of receiving the request.
- Right to restrict processing – you have the right to ask us to restrict processing of your data. We will look at any request and inform you of our decision within 28 days of receiving the request.
- Right to object – you have the right to object to our processing of your personal data based on (i) legitimate interests, or for the performance of a task in the public

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interests/exercise of official authority (including profiling); (ii) direct marketing (including profiling); and (iii) for purposes of scientific/historical research and statistics.

To exercise your rights, you can contact us at the following research@mediamindsglobal.com

To the extent our processing of your personal information is based on your consent, you also have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of any processing based on your consent before the receipt of such withdrawal.

You can also lodge a complaint about our processing of your personal information with your local data protection authority.

Marketing communications

We will only send marketing communications to you via email or other communication means where you have consented that we may do so.

We will usually offer you a check box on the forms we use to collect your personal information where, if you agree to receive marketing communications, you have to click the box. Where we send marketing communications to you via email, you may opt out of receiving any further marketing communications by clicking the 'unsubscribe' or 'opt-out' function in the email. In addition, you can also exercise your opt-out right at any time by contacting us at research@mediamindsglobal.com and providing the following information: your name, your email address, a contact telephone number, the marketing communications you would like to opt out of receiving.

Changes to this Policy

The terms of this Policy may change from time to time. We shall publish any material changes to this Policy through appropriate notices either on this Website or contacting you using other communication channels.

The associated procedures are monitored and reviewed on a regular basis and altered in line with technological advances and updated guidelines.

We encourage you to periodically review this page for the latest information on our procedures - including what we require of you – to ensure you continue to comply.

Contact

Questions and requests regarding this Policy are welcomed and should be addressed to Media Minds Global by emailing research@mediamindsglobal.com (mailto:research@MediaMindsGlobal.com)

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Privacy and data protection: Market Research

Media Minds Global abides by the Code of Conduct of the MRS.

Media Minds Global is registered with the Information Commissioner's Office (ICO) for the processing of personal data: registration ZA293440.

Media Minds Global are fully committed to safe-guarding the privacy/personal data of our clients, prospective clients, suppliers and research participants in line with General Data Protection Regulation (GDPR).

Personal data is defined as anything that may identify an individual e.g. full name (if in addition to any of the following), address, telephone number, email, national insurance number, ID/membership numbers of any kind, ISP addresses etc. Media Minds Global also include photos/recordings in their definition of personal data (but only when combined with identifiable information).

Client, Prospective Client, Supplier Personal Data

If you have commissioned a project or made an enquiry with Media Minds Global, we will retain your details for future communications. If you have sent details of your services to Media Minds Global, we may also retain your details.

If you do not wish for us to retain your details, simply reply to any received communication (research@mediamindsglobal.com) with the title 'DELETE ME'.

Research Participant Personal Data – Consent

It is the responsibility of our clients/suppliers to ensure that where they supply research participant personal data, they have complied with the requirements of GDPR – specifically, informed consent (also concerning recordings) - before sharing any personal data with us.

Where we supply research materials to clients/suppliers who are collecting personal data/obtaining consent on our behalf - or where we collect personal data ourselves - we will have designed these research materials with GDPR/consent in mind e.g. recruitment screener, questionnaire, online surveys, profile sheets etc.

Consent must include the name of the company(s) collecting data, the subject and purpose of the research, the type of organisation on whose behalf we are working, how we will use the data, the time commitment involved, any tasks required/costs incurred by the participant, any recordings being made, how long we will retain any personal data, reference to the MRS Code of Conduct and the right to withdraw at any time.

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We will only use the personal data for the purpose for which consent has been obtained.

Anyone collecting personal data on our behalf will have signed contracts with us, agreeing that they (their employees and any individuals acting on their behalf) will strictly adhere to the GDPR/consent elements of research materials supplied.

Retention Of Research Participant Personal Data

We will retain participant personal data until the related project invoice has been paid by our client (completion) plus six months. After this time, we will use a physical or digital shredder service to destroy the personal data held. This six-month period enables quality control to be completed and any project queries to be answered.

Anyone collecting personal data on our behalf will have signed contracts with us, agreeing that they will also securely destroy any personal data after this same six-month period.

Should the research materials include a 'permission to re-contact' question, any follow-up will only relate to the project/client concerned, and we will specify the time-period concerned at the consent stage i.e. at the point of collecting personal data (in most cases, this will not be longer than the six-month time-period to which consent already applies).

For qualitative methodologies e.g. focus groups, depth interviews, bulletin boards etc., research materials may include consent to extend Media Minds Global's retention of personal data for up to 24 months. This allows us to monitor repeat participation / maintain quality research recruitment. Photos/recordings – only when containing no identifying information - may be kept indefinitely, as they could for example, be included in research reports used/retained by our clients for internal use.

Any exception to the above retention procedures will have been agreed at the consent stage.

If at any point a participant wishes to withdraw from research they have agreed to participate in, they are advised to immediately contact their recruiter or Media Minds Global directly (details included in their 'invitation' / introduction email).

If a participant or panellist would like to revoke their consent and wishes for us not to retain their personal data, they can simply reply to any received communication (research@mediamindsglobal.com) with the title 'DELETE ME', or write to: Media Minds Global, Hershams Place Technology Park, Molesey Rd, Hershams, Walton-on-Thames KT12 4RZ UK)

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Transfer Of Personal Data

In most cases personal data is not shared outside of Media Minds Global/Media Minds Global employees. Where personal data is not needed to complete the task required, then it must be removed prior to sharing the data.

In the case that personal data is shared with a third party, participant consent must be obtained. Even where such consent exists, it will only relate to the project concerned, and Media Minds Global will have GDPR compliant contracts in place with, for example, viewing facilities, online qualitative software providers etc.

Such contracts also require that any third party must have systems in place to securely protect personal data, that the data must be used only for the purpose agreed and not shared with additional parties, and that personal data must be securely destroyed once Media Minds Global has all necessary feedback at conclusion of the project concerned e.g. attendance records, recordings of groups etc.

If password protected personal data is shared, this must be done using an encrypted email service (password provided separately).

Personal data may be stored or transferred to servers outside of the EU or US, but only where the organisation complies with GDPR and/or the EU-US Privacy Shield Framework. If personal data is to be stored or transferred to servers falling outside of the EU-US Privacy Shield Framework, then explicit consent must be obtained.

Storage Of Personal Data

Any physical records - photos/recordings/files - that contain personal data, must be stored in a secure/locked location. We operate a clear- desk policy for personal data.

Any digital records - photos/recordings/files - that contain personal data, must be stored password protected on a secure server/secure cloud server and NEVER on personal hard drives (unless the device is kept in locked storage when not in use). All devices that can be used to access personal data must be password protected with a screen-out of a maximum of 5 minutes.

Our own servers run up-to-date IT security software and continual virus/malicious scanning software. Our own servers run a securely encrypted continual cloud-based back-up.

Legal Demands

Only where we are obliged by law or an order of the court will otherwise confidential information be released.

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