

Legitimate Interests Policy

Version: 1

Date of issue: April 2018

This policy is effective from 25 May 2018



Esposito Research & Strategy limited.

Registered in England, company number 7238935.

Registered office: Camburgh House, 27 New Dover Road, Canterbury Kent CT1 3DN,
United Kingdom

Legitimate interests

The new data protection requirements (commonly known as GDPR) outline a number of reasons by which we can use the personal information you provide to us. One of these reasons is called 'legitimate interests'.

'Legitimate interests' takes into account three aspects: the purpose of processing your personal information, the necessity of doing so in order to achieve the stated purpose, and the impact on you in terms of your interests, rights or freedoms.

In practice, 'Legitimate interests' means that we have the potential to use your personal information if we have a genuine and legitimate reason to do so, the way we process or use your data is necessary and we are not harming any of your rights and interests.

So what happens in this case?

When you provide your personal details to us we may use your information to carry out any of the following tasks:

- To help you understand more about what we do as an organisation; for instance by sending you information about us in response to an enquiry from you.
- To prevent fraud; for instance in some of our projects we may need to check who you say you are, using the information you provided us.
- To maintaining the security of our system, modify or improve our services; for instance if you contact us with suggestions.
- To perform data analytics; for instance we may analyse data based on gender or age groups (please note that this data is typically anonymised at source).

During the course of our business we may process your personal information for a range of purposes on the basis of 'Legitimate interests' Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

How we may use your personal information

Direct Marketing: At Esposito Research & Strategy we do not routinely carry out any form of direct marketing. However we may occasionally organise customer event which further the aims and objectives of the company. We will also make sure our marketing is relevant for you, tailored to your interests.

Accounting, invoicing: In order for us to process the commissioning of a research project, we need to comply with our clients' Purchase Order requirements, take payments and collect the relevant

contact information such as name, email address, telephone number or banking details in order to ensure the smooth processing of the order. Client addresses and Purchase Order numbers or project references figure on our invoices, which are accessible to our Accountants for auditing.

Logistics: In order for us to deliver a research project we may need to organise logistics involving venue hire, product purchase, shipping or delivery, where payment has to be taken and contact information collected, such as name, delivery address and telephone number.

Your best interest: Processing your information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure.

Personalisation: Where the use of the information enables us to personalise, enhance or otherwise improve our services/communications for the benefit of our clients, business partners and research participants.

Analytics: To use your personal information for the purposes of customer analysis, assessment, profiling and direct marketing, on a personalised or aggregated basis, to help us with our activities and to provide you with the most relevant information as long as this does not harm any of your rights and interests.

Research: To determine the effectiveness of promotional campaigns and advertising and to develop our products, services, systems and relationships with you.

Due Diligence: We need to undertake due diligence on potential clients and business partners to determine if those companies and individuals have been involved or convicted of offences such as fraud, bribery and corruption.

We will also hold information about you so that we can respect your preferences for being contacted by us.

Your interests

Before we use your personal information for our legitimate interests, we will always consider and balance any potential impact on you and your rights under data protection legislation and any other relevant law. Our legitimate business interests do not automatically override your interests – we will never use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Remember, you can change the way you hear from us or withdraw your permission for us to process your personal details at any time emailing hello@espositoresearch.com.

Last Review Date: April 2018