

Privacy Policy

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UK: Esposito Research & Strategy Limited (ERS) registered in England and Wales
Registered in England, company number 7238935.

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

EU: Esposito Research & Strategy S. A. S. ; capital de 15000 Euros, siège social: 8 Rue
Pierre-Gilles de Gennes - 76130 MONT ST AIGNAN (FRANCE). Immatriculation numéro
892 492 307 Registre du Commerce et des Sociétés de Rouen. Nom commercial:
Esposito Etudes.



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Introduction

Your privacy is important to Esposito Research & Strategy (ERS).

When you choose to provide us with information about yourself, we recognise that you trust us to act in a responsible manner.

So we've developed a Privacy Policy that covers how we collect, use, disclose, transfer, and store your information. At all times, we will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

By providing us with your information you consent to our use of it in the manner set out in this policy.

Within the Privacy Policy you will find some specific examples of why and how we use your personal information. If you have further questions please get in touch with us by writing to muriel@espositoresearch.com. Further information about us is available at the end of this document.

Please note: This Privacy Policy is available on our website. If you click on, or follow, any links from our site to external websites, our privacy policy will no longer apply. Please check the privacy policies of any such external site before submitting any personal data, as we cannot accept any responsibility or liability in relation to them.

Full Privacy Policy

1. Purposes for processing your information

When we process personal information as part of our activities, this is governed by any of these lawful grounds:

- consent (for instance when you have agreed to the processing of your personal data for one or more specific purposes)
- performance of a contract (for instance sending project details if you have agreed to take part in one of our projects, or if you are a current or prospective client, or if you contact us with an enquiry and we use your contact details to respond).
- compliance with a legal obligation to which Esposito Research & Strategy Limited is the subject, as a data controller. For instance, processing payroll information to pay our employees.
- legitimate interests pursued by us as a data controller or by a third party (joint controller), except where such interests 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. An example of legitimate interest may be showing a project film to a video editor when we want to explain what sort of footage we want them to produce for another project.

In addition, we may occasionally need to process personal information according to the following lawful grounds:

- to protect the vital interests of the data subject or of another natural person;
- to perform a task carried out in the public interest or in the exercise of official authority vested in us as the data controller;

2. Information collected from our website

We collect certain information or data about you when you visit www.espositoresearch.com or www.espositoresearch.co.uk.

Our website does not hold contact forms so it does not collect information entered manually by you.

What we collect:

- a) questions, queries or feedback you insert in the body of your email if you write to us or that you mention verbally if you call us. If you email us directly or via info@espositoresearch.com or info@espositoresearch.co.uk, we will also collect your email address.
- b) details of which version of web browser you used as well as information on how you use the site, by using cookies and page tagging techniques. Cookies are small data files that are placed onto the hardware device which you use to browse the internet by websites that you visit.

We use Google Analytics to monitor the use of our website. This is set up to anonymise your IP address (this is the unique address that denotes where you are accessing the internet from), so we never see, collect or store your IP address.

Please refer to our Cookie Policy for further information on the cookies we use.

Why we collect it

- to ensure that content from our site is presented in the most effective manner for you and for your device
- to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes
- to carry out our obligations arising from any contracts entered into between you and us
- to allow you to participate in interactive features of our service, when you choose to do so and
- to notify you about changes to our service.

This information can be viewed by authorised people at Esposito Research & Strategy and by our supplier of IT/web services, Warren IT Services Limited, to:

- improve the site by monitoring how you use it
- gather feedback to improve our services
- respond to any feedback you send us.

3. Other personal information we collect

We collect personal information in the form of contact details in the normal course of business, as well as information for our research projects that may include personal participant information.

Contact details

If you contact us by any channel with an enquiry, we will use the contact details you provided to respond to your enquiry and retain your contact details, as well as any additional personal information you may have given us as part of your enquiry, until such as time as we are satisfied that your enquiry has been fully addressed to your satisfaction.

If there is no ongoing relationship between us and you, your contact details and any other information you provided will then be deleted as outlined in our Data Protection Policy.

If there is an ongoing relationship between us and you, for instance because you are a customer, employee or contractor of Esposito Research & Strategy, we will retain your details for as long as that relationship is necessary and for a number of years after the relationship is deemed to have ended as outlined in our Data Protection Policy.

Email alerts & email sign up

We do not send out marketing alerts, newsletters or email campaigns for marketing purposes. We do not use a mail marketing package.

Project information

In the course of our projects we may collect personal information from participants such as but not limited to their name, address, age, household information, and image. Occasionally we may collect information relating to health conditions: for instance if we are carrying out a project involving testing foods, we want to make sure that you are not intolerant or allergic to specific ingredients.

Occasionally we carry out projects with children: we take careful steps to ensure the information we provide young participants is accessible and appropriate for their age, and comply with local regulations or guidance in place governing parental consent.

Wherever possible, we put steps in place to anonymise your data at source: for instance using your first name only, and not linking comments you made during the course of the research to you. With large-scale quantitative surveys, we pseudonymise your data as a matter of course: this means that we never have access to your name in this instance.

4. Keeping your information secure

We have procedures and security features in place to keep your information secure once we receive it. A summary of the steps we take to keep your information secure is outlined in this section. This is detailed further in our Data Protection Policy, available on request.

File security

We use a range of technical and organisational measures to safeguard access to and use of, your personal information. These include hardware encryption and password protection, file encryption and password protection, anti-virus and anti-malware software deployment, physical access controls and staff training.

Where your information is stored

We store your information, whenever possible, on secure servers in the European Economic Area (EEA) or in the UK. Any transfer of personal information necessary within the UK is subject to the UK's Data Protection Act overseen by the UK's Information Commissioner Office. Where it is necessary to disclose your information to processors or joint controllers located in the EEA, we ensure that all transfers and parties comply with the EU's GDPR. Since 1 January 2021, the Trade Partnership Agreement agreed between the UK and the EU applies. Transfers from the UK to the EU are permitted under the UK's Data Protection Act, and transfers from the EU to the UK are currently permitted without standard contractual clauses until 30th June 2021 under the terms of the Trade Partnership Agreement. For transfers outside the EEA or to other jurisdictions we ensure that appropriate legal and security safeguards are in place, as determined by the UK authorities or the European Commission.

Disclosing your information

We may pass on your personal information if we have a legal obligation to do so, or if we have to enforce or apply our terms of use or other agreements in place.

During the course of a project, we may pass on your personal information to approved sub-contractors acting as part of our team on our projects and subject to a Non-Disclosure Agreement, Data Processor Agreements and to ERS policies. The majority of our sub-contractors are based in the

UK. For some projects, we may use sub-contractors based in other parts of the European Economic Area (EEA)* or in non-EEA countries part of the European Free Trade Area (EFTA)** or in assured territories*** that the EU Commission deems safe for the purpose of data protection.

Most of the data we share with our clients as part of our projects is aggregated and anonymised: this means it does not contain any information that could help identify you as an individual. For some projects, where necessary, we may share some of your personal information with the client commissioning the research and their agencies also concerned by the project (typically first name, gender, occasionally first digits of postcode, basic product usage, photograph or video footage). In such cases we will always obtain your informed consent upfront and be clear as to how the data will be used and other parameters governing this specific requirement. Your information will only be processed in this way if we have your express consent upfront.

We won't share your information with any other organisations for marketing, future market research or commercial purposes, and we don't pass on your details to other websites or put your personal information in the public domain.

** EEA countries: Austria, Belgium, Bulgaria, Czech Republic, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden.*

***EFTA countries: includes EEA countries plus Switzerland.*

****Assured territories: Andorra, Argentina, Canada, Guernsey, Isle of Man, Israel, Jersey, New Zealand, Switzerland, Faroe Islands, Uruguay.*

The European Commission has agreed that these territories can provide adequate safeguards for the purposes of the Directive. Transfers out of the EEA and into these territories will not breach the adequate safeguard requirement. The list may also be subject to change from time to time as new adequacy rulings are made by the European Commission.

5. Your rights

You can find out what information we hold about you, and ask us not to use any of the information we collect. If you wish to exercise this right, please send your request to muriel@espositoresearch.com.

Our representative in the EU for the purpose of data protection is our branch office ESPOSITO ETUDES as per details outlined in Section 6.

6. About Us

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