



## Little Blue Research, Ltd. Privacy policy

### Introduction

Little Blue Research, Ltd. a limited company registered in England under company number 10020972, whose registered address and main trading address is Flat 1, Bramwell House, Camden Grove, Chislehurst BR7 5BH ("LBR") takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact: [info@littleblueresearch.com](mailto:info@littleblueresearch.com)

If you have entered into a contract with LBR the controller of your data will be LBR as stated in your contract and any additional consent you give us.

Our personal information handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

### About this Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Little Blue Research Ltd.

We will only use your personal information to administer your details as a website user, potential customer or subcontractor/sub-contractor/customer to provide the products and services you have requested from us. We will never sell, share or use your personal information other than as described within this policy or individual contracts.

### Who this policy applies to

Little Blue Research Ltd is a consultancy. This policy applies to website users, prospective customers and subcontractors, customers, sub-contractors, suppliers, those undertaking interviews and surveys as part of consultancy projects and those in contact in any other capacity with Little Blue Research Ltd.

### How to change your preferences

You can visit the Little Blue Research Ltd. website ([littleblueresearch.com](http://littleblueresearch.com)) to contact us to change your preferences at any time, alternatively you can use the contact methods provided above.

### What this policy applies to



This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This may include but is not limited to:

#### A. General website users, potential subcontractors/customers

##### A1. What information do we collect?

We may collect and process personal data about you when you interact with us on our website by submitting a contact us request, connect via a social media platform or we meet at conferences. The personal data we may process includes but is not limited to:

- your name;
- your home or work address, email address and/or phone number;
- your job title;
- Link to LinkedIn profile or other social media platform
- details of website use, via our cookies on our website (please see the cookie policy) and Google Analytics for more details about Google Analytics uses data please see <https://support.google.com/analytics/answer/6004245?hl=en>;
- and/or any other information you provide

##### A2. How do we use this information and what is the legal basis for this use?

We may process the personal data listed in paragraph 1 above for the following purposes:

- as required to establish contact and reply to a query from our website, for example, if you send us a question from the contact us form. This may include communicating with you, and providing customer services. We require this information in order to reply to your query and are unable to do so without it;
- to comply with applicable law and regulation;
- in accordance with our legitimate interests in protecting LBR's legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- we may use information you provide to personalise (i) our communications to you, (ii) in accordance with our legitimate interests;
- to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and website, both online and offline, in accordance with our legitimate interests; and
- in circumstances where you meet/contact us during conferences or connect via social media platforms we may use the information to connect via LinkedIn, meet for coffee, or a request to join a future newsletter, or add you to Little Blue Research's CRM in accordance with our legitimate interests.



## B. Customers

### B1. What information do we collect?

We may collect and process personal data about you when you interact with us and purchase services from us. The personal data we may process includes but is not limited to:

- your name;
- your home or work address, email address and/or phone number;
- your job title;
- Link to LinkedIn profile or other social media platform
- your payment details, including billing addresses, where you make purchases from us;
- information related to the browser or device you use to access our website;
- details of website use, via our cookies on our website (please see the cookie policy) and Google Analytics for more details about Google Analytics uses data please see <https://support.google.com/analytics/answer/6004245?hl=en>; and/or
- any other information you provide

### B2. How do we use this information and what is the legal basis for this use?

We may process the personal data listed in paragraph 1 above for the following purposes:

- as required to establish and fulfil a contract with you, for example, if you enter into an agreement to provide or receive services. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the provision of services. We require this information in order to enter into a contract with you and are unable to do so without it;
- we may use the information to connect via LinkedIn, meet for coffee, or a request to join a future newsletter, or add you to Little Blue Research's CRM in accordance with our legitimate interests.
- to comply with applicable law and regulation;
- in accordance with our legitimate interests in protecting LBR's legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our services;
- to personalise (i) our communications to you; (ii) or our services for you, in accordance with our legitimate interests;
- to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests.



### C. Subcontractors, interns and suppliers

#### C1. What information do we collect?

We may collect and process personal data about you when (a) you wish to be considered or provide subcontractor services, become an intern or supplier. The personal data we may process includes but it is not limited to:

- your name;
- your home or work address, email address and/or phone number;
- your biography and CV and where you are featured on our website your photograph
- your job title;
- Link to your social media profiles as needed;
- your payment details, including billing addresses, to allow us to pay you;

#### C2. How do we use this information and what is the legal basis for this use?

We may process the personal data listed in paragraph 1 above for the following purposes:

- to enable us to pay you for the work completed to deliver a client contract;
- in connection with legal claims, compliance, regulatory and investigative purposes;
- to invite approach you for other work/contract opportunities;
- to connect via LinkedIn, meet for coffee, or a request to join a future newsletter, or add you to Little Blue Research's CRM in accordance with our legitimate interests.
- to respond to your comments or complaints, including to investigate any complaints received from you or from others;
- to monitor use of our websites and online services and use your information to help us check, improve and protect our products, content, services and websites, both online and offline;

### D. Interviewees and survey respondent data collected during consultancy projects

#### D1. What information do we collect?

We may collect and process personal data about you when you consent to take part in a research project with/for us as part of a research or consulting project. The personal data we may process includes but is not limited to:

- your name;
- your home or work address, email address and/or phone number;
- your job title;
- information related to the browser or device you use to access our website or complete our survey;
- details of website use, via our cookies on our website (please see the cookie policy) and Google Analytics for more details about Google Analytics uses data please see <https://support.google.com/analytics/answer/6004245?hl=en>; and/or
- the answers to survey or interview questions



- any other information you provide

D2. How do we use this information and what is the legal basis for this use?

We may process the personal data listed in paragraph 1 above for the following purposes:

- as required to establish and fulfil a research project brief. This may include verifying your identity, communicating with you, providing information about the project you have participated in. We require this information in order to ensure survey entries are genuine;
- to comply with applicable law and regulation;
- in accordance with our legitimate interests in protecting LBR's legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- we may use information you provide to personalise (i) our communications to you, (ii) in accordance with our legitimate interests;
- to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and website, both online and offline, in accordance with our legitimate interests; regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our services;
- to personalise (i) our communications to you; (ii) or our services for you, in accordance with our legitimate interests;
- to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests.

3. With whom and where will we share your personal data?

We may share your personal data with our subcontractors to process it for the purposes of administration e.g. to organise a meeting, invoicing, etc.

We may also share your personal data with the below third parties:

- our professional advisors such as our auditors and external legal and financial advisors;
- our suppliers, business partners and sub-contractors;
- search engine and web analytics;
- other providers of services to us including, website hosting, IT management;
- third party applications to store and transfer project data (these may include but not limited to: Dropbox, Capsul and Onedrive); and/or
- third party tools/applications to help conduct/complete project work (these may include but not limited to: Toggl time tracker, Tableau and SurveyMonkey)

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our



legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of LBR for the purposes above. Such third parties include, but are not limited to, providers of website hosting, maintenance, call centre operation and identity checking credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you.

Your data is not shared with/sold to any other third parties for marketing purposes or for any reasons other than as described here or for legitimate business interest without your prior consent. In order to protect your data, we ensure that all third parties used are also in compliance with EU GDPR regulations.

In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

#### 4. How long will you keep my personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

Where you are a **prospective customer/web site contact and you have sent an online query, met us at a conference**, we will only retain your data (a) while you interact with us and our content; or (b) for 36 months from when you last interacted with us or our content.

Where you are a **customer**, we will keep your information for the length of any contractual relationship you have with us and according to relevant legal requirements.

Where you are a **subcontractor/supplier**, we will keep your information for the length of any contractual relationship you have with us and according to relevant legal requirements.

We may retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require LBR to hold certain information for specific periods other than those listed above.

#### 5. Where is my data stored?

The personal data that we collect from you is stored on Little Blue Research Ltd.'s computer systems.

#### 6. Our obligations

We are a data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the Data Protection Act 1998



and the GDPR (2018) in the way we use and share your personal data. Among other things, this means that we will only use your personal data:

- fairly and lawfully
- as set out in the appropriate legislation and this policy
- to fulfil contracts or for legitimate business interest
- in order to provide efficient communication to complete our services and respond to queries and requests
- to arrange/invite you to networking events/meetings
- to monitor use of our website
- for financial processing – Invoices/Wages

We will take reasonable precautions to safeguard the personal information that you supply.

Little Blue Research Ltd. may from time to time use your information for account management or relationship management purposes. The main purpose of this is to provide you with information and/or to maintain any existing relationship we may have with you.

## 7. Cookies

The Little Blue Research Ltd. website, [www.littleblueresearch.com](http://www.littleblueresearch.com), uses cookies to provide functionality, social media features and for analytical purposes. For more information about cookies, please read our full Cookie Policy which can be found on [www.littleblueresearch.com/details](http://www.littleblueresearch.com/details).

## 8. What are my rights in relation to my personal data?

Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations. If you have any queries or concerns about the use of your data please contact us on [info@littleblueresearch.com](mailto:info@littleblueresearch.com)



## 9. Security

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours.

## 10. Where can I find more information about LBR's handling of my data?

Should you have any queries regarding this Privacy Notice, about LBR's processing of your personal data or wish to exercise your rights you can contact LBR using this email address: [info@littleblueresearch.com](mailto:info@littleblueresearch.com).

We will process SARs within the legally required time period, SAR responses are usually free but we reserve the right to charge for excessive or unfounded requests. We are committed to fully complying with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>

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