

Privacy Policy – Silver Dialogue Limited

This privacy policy is effective as of 25 May 2018.

Silver Dialogue Limited (Silver Dialogue, we, us) are committed to respecting your privacy and protecting your personal information. Our privacy policy describes how we capture and use the personal information that we gather about visitors to this website and for participants of our research studies. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

Silver Dialogue provides products and services which enable our customers (businesses, charities and organisations) to collect, collate and understand public and customer opinion. This is usually through us undertaking research studies including surveys (online, telephone and face to face), hosting focus groups and discussions (online, telephone and face to face).

Depending on the nature of each research study that we undertake, Silver Dialogue can be acting as a data controller, a joint data controller or a data processor. As part of the introduction to your taking part in a study you will be told what role Silver Dialogue is undertaking and the names of the other organisations involved and their data responsibility for the study you agree to participate in.

If you have any questions, comments or complaints regarding our privacy policy or practices, please contact us:

- **UK address:** Attn: Data Protection Officer, Silver Dialogue Limited, PO BOX 6470, Rushden, Northamptonshire, NN10 0ZW, UK

or at dpo@silverdialogue.co.uk.

We will not use any information that we hold about you for **direct marketing purposes or pass it on to any third parties for direct marketing purposes.**

Our privacy practices differ depending on whether you fall into one of two categories, so we have created different policies for each of these, accessible from the links below:

- Visitor to our website www.silverdialogue.co.uk (or.com)
- Participant in one of our research studies (including our online surveys)

A) Privacy policy if you visit our website (other than as a survey respondent)

This policy applies to all personal information for which we are the data controller.

A1. The information we collect about you

We collect information about you when you provide it to us, when you use our products, services and website, and when other sources provide it to us, as follows:

Account information: where you subscribe to our products or services, or create an account with us, we collect information from you such as your name and email address, username, phone number, address and organisation. We also ask for and collect personal information such as an email address and name from any individual that you authorise to use our products or services.

Billing information: where you need to make a payment to us for our products or services, we collect your billing details, including a billing address and financial and payment information.

Information that you provide to us: we collect the information that you give to us, for example when you:

- contact us by phone, email, online chat or otherwise.
- fill in forms on our website.
- register to use our website.
- sign up for our newsletters and promotions.
- respond to a survey
- register or attend one of our events or training courses.
- participate in forums on our website.
- contact us for customer support.

Technical information: we collect information relating to your interaction with our products, services and website, including the type of browser and/or device used, operating system, files viewed, date/time stamp, referrer page and IP address.

Usage information: We collect information about your use of our website including which webpages you view, the services you view or search for, your referring and exit pages, the length of visits to certain pages and the times and dates of these actions.

Cookies: A cookie is a small data file that we store on your browser or the hard drive of your computer/smart phone when you visit our website or use our services. We use cookies, just to track visits to our website, we store no personal details. You can choose whether to allow cookies or not. Allowing cookies enables you to get the best use out of our website and services. You can use your web browser's settings to manage cookies, for example to delete existing cookies, to prevent your browser from accepting new cookies or to disable cookies altogether. However, this may affect your ability to use parts of our website and our services.

A2. How we use your information

We use the information that we hold about you in the following ways. For each of these, we have identified our legal basis for processing your information in that way.

Responding to enquiries: we will use your contact information and any information that you send to us to respond to your questions, requests for information or complaints. Depending on the nature of your enquiry, we may do this on the basis of performing our contract with you, our legal obligations, or our legitimate interests of providing you with the best service and understanding how we can improve our products and services based on your experience.

Third party services: where you choose to enable or connect to a third party application or service we use the information provided about you by that application or service to enable it to work in conjunction with our products or services.

To protect our business, products, services and website: we will use your information in accordance with our legitimate interests of administering and maintaining our website and services.

To develop, test and improve our products, services and website: we will use your information about how you use our products, services and website to improve the user experience for our users.

Legal requests: we may need to use your information to comply with a legal obligation such as to respond to a court order or a request from a supervisory authority or government, or to prevent fraud.

Notifications: we will use your information to send you communications which are required by law or to notify you of changes to our terms or this privacy policy, or changes (permanent or temporary) to our products or services. Such messages will not include any promotional content. Depending on the nature of the communication we may do this on the basis of performing our contract with you or complying with our legal obligations.

Surveys and feedback requests: we may use your information to invite you to participate in surveys run by us on our own behalf, for example to invite your feedback on our products, services and website. These communications will not contain any promotional content and will be sent on the basis of our legitimate interests of improving our products, services and website. However, if you would prefer not to receive such communications, please contact us at privacy@silverdialogue.co.uk.

You may stop receiving marketing communications from us at any time. To withdraw your consent or to opt-out of receiving marketing communications, you may contact us at privacy@silverdialogue.co.uk or follow the unsubscribe instructions contained in the communication itself.

Legal basis for processing (EEA only): where your data is processed by Silver Dialogue Limited or if you are an individual from the EEA, we must have a legal basis for collecting and using your information when we act as data controller. This will be one of the following:

- a. where we require the information to perform a contract with you (e.g. to deliver the services that you have requested);
- b. where we have your consent to do so, and in this case you have the right to withdraw or refuse to give your consent at any time. This will not however affect the lawfulness of any processing based on your consent before you withdraw it;
- c. where the processing is necessary for our legitimate interests (and those legitimate interests are not overridden by your interests or fundamental rights and freedoms); or
- d. where we need to comply with a legal or regulatory obligation.

If you have any questions about or require further information concerning the legal basis on which we collect and use your information, including regarding our legitimate interests, please contact us.

A3. Who we share your information with

We will only disclose your information in the circumstances below:

Our service providers: we may disclose your information to our third party service providers. In each case we have agreements in place with the service provider to ensure that they provide appropriate protection for your information and to ensure that they are only permitted to use your information in accordance with our instructions and as necessary to provide the relevant service to us.

For example, we engage third parties to provide the following services:

- hosting our online survey services and our website.
- hosting our online telecommunications services.
- sending our customer communications.
- providing our online chat services.
- provide analytics information.
- manage credit card processing.

Professional advisers: we may need to disclose your information to our professional advisers, including our lawyers, bankers, auditors and insurers.

Compliance with legal obligations and enforcement of our rights: we may also have to disclose your information if this is reasonably required to:

- comply with any applicable law, regulation or legal process or to respond to a request from a government or a regulatory body.
- enforce our agreements, policies and website terms of use.
- protect the security or integrity of our products and services.

A4. Links to other websites

This privacy policy covers our products, services and website. Our website may contain links to and from third party websites. The information practices and the content of such other websites are governed by the privacy policy of that website. If you click on a link to those websites you will leave our website to go to the website that you selected. Please note that we cannot accept responsibility or liability for any use of your personal information by such third parties, and we cannot guarantee that they will adhere to the same privacy practices as us. We encourage you to review the privacy policies of any third party before you submit any personal data to them.

A5. Updating your information

If you wish to update, amend or request deletion of your personal information you may do so by emailing us at privacy@silverdialogue.co.uk. We will respond to your request within 30 days.

A6. Your rights as a data subject

At your request we will provide you with information about whether we hold any of your personal information and provide a copy of this information to you. To request this information please contact us at privacy@silverdialogue.co.uk. You may update, amend or request deletion of your personal information as described above.

Where your information is processed by Silver Dialogue Limited or if you are from the EEA you may have the right to exercise additional rights available to you, including:

Right of Erasure: in certain circumstances you have the right to erasure of personal information held about you, although this may be qualified where e.g. it is necessary for that information to be retained for record keeping purposes or compliance with our obligations. If we are unable to comply with your request, we will explain why.

Right of Rectification: you have the right to have your personal information rectified if it is inaccurate or incomplete.

Right to Object: you have the right to request that we stop processing your personal information for marketing purposes, and can request that we stop processing your personal information for other purposes based on our legitimate interests. In some cases, we may be able to demonstrate that we have compelling legitimate grounds to continue to process your information.

Right of Restriction: you may have the right to request that we restrict the processing of your personal information (e.g. where you believe that the personal information we hold about you is inaccurate or unlawfully held).

Right to Data Portability: you may have the right to be provided with your personal information in a structured, machine readable and commonly used format and to request that we transfer the personal information provided by you to another data controller.

You also have the right to **withdraw consent** at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you would like to exercise such rights, please contact us at privacy@silverdialogue.co.uk. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

You also have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. In the UK, this is the Information Commissioner's Office <https://ico.org.uk/>.

A7. How long we keep your information

We will retain your information for as long as your account is active or as needed to provide our products or services or otherwise fulfil the purposes described in this policy, including for the purposes of satisfying any legal, accounting or reporting requirements. If you wish to delete your personal information at any time, please contact us at privacy@silverdialogue.co.uk. If we are unable to comply with that request, for example because we need to retain some or all of your information to comply with a legal obligation, we will let you know and will explain why.

A8. Security of your information

We take the security of your information extremely seriously and follow industry best practice. All information that you provide to us is stored on secure servers.

A9. International transfers of information

Your information may also be processed by some of our third party service providers which may operate outside of the EEA. Whenever we transfer your information out of the EEA, we ensure that a similar degree of protection is afforded to it by transferring to organisations that participate in the Privacy Shield Framework or by putting in place appropriate contractual terms including where relevant the EU standard contractual clauses.

A10. Changes to our privacy policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will post a notice on the homepage of our website, the login screens for our services, and/or we will send an email notification to our account holders. We will also keep prior versions of this policy in archive for your review.

B) Privacy policy if you are a participant in one of our research studies (including our online surveys)

This policy applies to all personal information for which we are the data controller.

B1. The information we collect about you

We collect the following information about you:

Survey Data: we collect your survey responses. We may also have uploaded your contact information to enable us to invite you by email to participate in the survey, and to send reminder emails to you.

Technical information: we collect information relating to your interaction with our software and services, including the type of browser and/or device used, operating system, date/time stamp, referrer page and IP address. We do not link this information to your Survey Data.

Cookies: A cookie is a small data file that we store on your browser or the hard drive of your computer/smart phone when you visit our website or use our services. We use cookies, just to track visits to our website, we store no personal details. Our online survey system, can be enabled to use a cookie to prevent you completing the same survey multiple times – we do not enable this for all of our surveys.

Your contact information: we will collect information from you if you contact us directly, for example in relation to a survey invitation that you have received. This is in accordance with our legitimate interests of providing customer service.

B2. How we use your information

We use the information that we hold about you in the following ways:

Survey Data – we hold, store and process your Survey Data solely to provide the aggregated results and analysis to the customer organisation of the research study, as in accordance with our agreement with them.

Technical information – to protect our services, and for analysis: we will use your information in accordance with our legitimate interests of administering and maintaining our systems and ensuring network and information security, for example to prevent unauthorised access to our networks, to investigate faults, to control the abuse of our products or services, to prevent denial of service attacks and to monitor system usage and server load. We may also use this information in aggregate form for our legitimate interests of improving our products and services.

Cookies – to prevent multiple survey completion: if we have enabled this feature.

Your contact information – to respond to your enquiry: we will only use your contact information where you contact us directly, in order to respond to your enquiry. This is in accordance with our legitimate interests of providing customer service.

We will not use any information that we hold about you for **direct marketing purposes**.

B3. Who we share your information with

Survey Data: unless we are required to do so by law, we will not disclose your Survey Data to any third parties other than our customers and our subprocessors that have been authorised by our customer in our agreement with them.

Your contact information: where you contact us directly we may, if appropriate, refer your enquiry to our customer.

B4. Your rights as a data subject

At your request we will provide you with information about whether we hold any of your personal information (other than your Survey Data) and provide a copy of this information to you. To request this information please contact us at privacy@silverdialogue.co.uk. You may also request that we update, amend or delete your personal information.

If you wish to access, correct, or delete your Survey Data, or exercise any of the other rights described below in relation to your Survey Data, you will need to contact us at privacy@silverdialogue.co.uk.

Where we are the data controller, you may have the right to exercise the following additional rights:

Right of Erasure: in certain circumstances you have the right to erasure of personal information held about you, although this may be qualified where e.g. it is necessary for that information to be retained for record keeping purposes or compliance with our obligations.

Right to Object: you may have the right to object to our processing of your personal data for purposes based on our legitimate interests. In some cases, we may be able to demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

Right of Restriction: you may have a right to request that we restrict the processing of your personal data (e.g. where you believe that the personal data we hold about you is inaccurate or unlawfully held).

Right to Data Portability: you may have the right to be provided with your personal data in a structured, machine readable and commonly used format and to request that we transfer the personal information provided by you to another data controller.

If you would like to exercise such rights, please contact us at privacy@silverdialogue.co.uk. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

You also have the right to **withdraw consent** at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

You also have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority. In the UK, this is the Information Commissioner's Office <https://ico.org.uk/>.

B5. How long we keep your information

Research Data: We store your research data (which could include, with your permission, survey data, photographs, video footage, audio recordings etc.) for a maximum of a year from you having taken part in the research study.

Aside from this research data we are likely to hold only very limited information about you. We typically retain technical information for no longer than 6 months from the date we collect it and will retain your contact information for no longer than a year after we have resolved your enquiry (unless we have a specific reason to retain it for longer, for example to comply with a legal requirement).

B6. Security of your information

We take the security of your information extremely seriously and our information security policies and procedures follow industry best practice.

All information that you provide to us is stored on secure servers. Our Survey Data is encrypted on the servers at rest and in transit across the internet.

B7. International transfers of information

Your information may also be processed by some of our third party service providers which may operate outside of the European Economic Area ("EEA"). Whenever we transfer your information out of the EEA, we ensure that a similar degree of protection is afforded to it by transferring to organisations that participate in the Privacy Shield Framework or by putting in place appropriate contractual terms including where relevant the EU standard contractual clauses.

B8. Changes to our privacy policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will post a notice on the homepage of our website. We will also keep prior versions of this policy in an archive for your review.

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