



MURMUR RESEARCH & CONSULTANCY LTD

PRIVACY POLICY (updated August 2020)

Please take the time to read and understand this policy. The policy covers any person whose personal details and/or other data is passed on to Murmur Research & Consultancy Ltd, either directly from themselves e.g. through inhouse recruitment, or, where they have consented to the transfer to their personal data, via an outsourced recruiter or other agency/business that works with Murmur. The policy covers them whether they take part in a research project/session or withdraw before any involvement takes place.

Murmur is the data controller; this means we decide how we use personal data provided to us. We are committed to meeting the requirements of the following laws and codes:

- **The EU General Data Protection Regulation (GDPR)**
- **Data Protection Act 2018**
- **Market Research Society's (MRS) Code of Conduct**

We rely on the following lawful bases for processing your data:

- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
- **Consent:** the individual has given clear consent for us to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.

Research & Consultancy

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www.murmurresearch.com Registered VAT No: 676 1634 15

Murmur Research and Consultancy Ltd Registered Office: 18 Holly Road Farnborough Hampshire GU14 0EA Registered in England & Wales No: 10675653



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WHEN DO WE COLLECT INFORMATION FROM YOU?

We collect your information when:

- You complete a paper or electronic form from us.
- You send and receive emails and text messages from us
- You take part in a research activity i.e. in our conversations/interviews with you, whether in person, on the phone or through online video conference software such as Zoom. We may record these sessions - audio or video, if your consent is given to do so
- You engage with an online community forum, if utilised on a project you're taking part in
- You complete an application from us to take part in market research posted online and on social media platforms such as Facebook
- A third party, such as a recruitment agency you have signed up to, sends us your information because they have recruited you for one of our projects

WHAT INFORMATION DO WE COLLECT?

We collect:

- **All information you choose to provide to us.**
- **Information we collect when you participate in a research project with us.** This may include personal opinions and personal information.
- **Special categories of data.** This means information such as your racial or ethnic origin, religious beliefs or other beliefs of a similar nature and your physical or medical condition. We ask for this kind of detail in certain forms you may complete e.g. for recruitment purposes or via telephone/online questionnaires and conversations. You can choose whether or not you want to provide it. However by choosing not to, you may not be able to participate in certain projects.
- **The time, date, location and topic of the market research you carry out.**
- **Usernames and any other unique identification numbers** we issue to you or that you use to access our online community forums when applicable.
- **Messages you send direct to us via social media, our company's website or via email.**

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HOW DO WE USE YOUR INFORMATION?

We use the information we collect on you for the following purposes:

- **To send you links to invite you to carry out market research** if you have signed up to an online community forum or filled in a recruitment application from us
- **To put you forward to participate in market research** that you wish to take part in or we think you may be interested in taking part in. Your details will be kept on our database unless you ask for them not to be (an option will be included on any recruitment application form from Murmur asking you whether you wish to stay on our database or not)
- **To provide you with our website** which requires a certain amount of technical information to work properly.
- **To make sure you get the incentives you're promised.**
- **To make a contract with you.** But also to enforce a contract if you breach it. I.e if the terms of the contract are not met because you choose to withhold data that is in the interest of the research then your involvement and further participation could be terminated.
- **To reply to and deal with any questions,** suggestions, issues, complaints or disputes you or our clients have contacted us about. We may share your data, including our recorded telephone conversations, with our clients to respond to a dispute or complaint that you or they raise about how we carried out the market research on their behalf.
- **To respond to any social media posts** or other public comments you might make, whether they are directly to us or about us, websites, services or other activities.
- **To protect you** and our business from any other potentially criminal behaviour, including fraud.
- **To power our security measures and services** so you can safely access our website. It also lets us do things such as recognise your username and password, as well as reset them if you happen to forget what they are.
- **For internal monitoring and training purposes** to check and improve the way we handle our telephone conversations with you.
- **To tell you** about any changes to our services and website. For example, if we change our terms and conditions or this privacy policy.
- **To help us maintain administrative and statutory records** about our business so we can better understand who we've recruited and pay our taxes.

By matching information that's common to the various sources of information we have about you, we're able to build a bigger, richer picture. So for example, you

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might register for one survey and provide your email address. You might then register for a focus group with us using the same email address. Simply linking those two pieces of information together helps us to understand you better and tailor our services to you and our clients.

WHO DO WE SHARE YOUR INFORMATION WITH?

We recruit individuals to participate in market research on behalf of third parties. We therefore can't run our business or provide many of the services and incentives you receive from us without sharing your information with other people or involving other people and organisations from time to time.

When we share your information, we want you to know that we only do so in accordance with our legal data protection and privacy obligations.

Your information may be disclosed to:

- **Third party companies who have commissioned market research** that you take part in. We may share your name, contact details and your responses to the market research.
- **Other people who help us provide our websites and related services to you.** They include information technology experts who host or maintain our website.
- **Rewards companies** which you have signed up to, in order for you to receive the incentives we may offer if you complete market research with us. (We may share your name and email address. They may keep this information).
- **Any new business partners** we may have over time, for example, in the event of a joint venture, reorganisation, business merger or sale that affects us. In such instances, we will ensure your personal data remains protected
- **Our professional advisors** including our lawyers and technology consultants when they need it to give us their professional advice.
- **The Police, local authorities, Her Majesty's Revenue and Customs (HMRC), the courts** and any other government authority if they ask us to do so (but only if us doing so is lawful).
- **Any individual you instruct to act on your behalf**

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Social media, blogs, reviews, etc.

Any social media posts or comments you send to us (on our Facebook page, for instance) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they're written and could be made public. Other people, not us, control these platforms. We're not responsible for this kind of sharing. So before you make any such remarks or observations, you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you'll understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you're unhappy about it.

It's worth remembering too, that any blog, review or other posts or comments you make about us, our products and services on any of our blogs, reviews or user community services will be shared with all other members of that service and the public at large.

You should take extra care to ensure that any comments you make on these services, and on social media in general are fit to be read by the public, and are not offensive, insulting or defamatory. Ultimately, you are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

INTERNATIONAL TRANSFER OF YOUR INFORMATION

Although we're based in the UK we recruit participants on behalf of clients around the world. If you take part in market research for one of those clients, the information we collect may be transferred to, stored and used by such clients at premises in other countries.

Naturally, we aim to ensure all our clients take information security as seriously as we do. Even so, information protection laws can vary from country to country.

For instance, the law of the country in which you are resident or domiciled may offer a higher standard of protection than the laws in the UK and/or the other countries where our clients are based. Any transfer of information we make to other countries could result in that information being available to their government and other authorities in those countries under their laws. However, in the event that data is transferred outside of the EEA, Murmur will use EU approved standard contractual clauses to safeguard any transferred data.

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SECURITY OF YOUR INFORMATION

We take the security of your information very seriously. We comply with the relevant laws and codes stated at the beginning of this policy which requires us to have in place appropriate security measures at all times, including where we share your information with our suppliers and partners.

Examples of the types of security measures we use include:

- Staff data protection training
- Access controls to monitor and limit when the relevant staff members can access your personal data. When they do, it will only be when necessary
- Physical and technical information security measures such as encryption and other cyber and hardware security measures that ensure a data breach is minimised as much as possible

You can rest assured that whenever personal information is received by us it will always be stored and backed up on encrypted devices and within our locked, alarmed and CCTV operated premise. Our emails are also encrypted so data is safe in transit and at rest. We also limited access to your data only to key people at the Murmur HQ, if we involve another organisation in a project you're taking part in then you will be notified of who they are at the start of the project and before you consent to us processing your data

Please also take care of your own information. For security tips and tricks when using the internet, WIFI and smartphones or tablets, please check out www.getsafeonline.org.

HOW LONG DO WE KEEP YOUR INFORMATION?

We can only keep your information for as long as necessary for the purposes set out above. This restriction is set by the relevant laws and codes stated at the beginning of this policy. The precise length of time we hold your information for varies depending on your individual circumstances.

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In any event, we will not keep your personal data for longer than necessary to fulfil the purpose for which it was collected, and have implemented data retention schedules to ensure your personal information is not retained beyond this period.

MANAGING YOUR INFORMATION

To reduce the chances of an error or misunderstanding, we need to keep the information we gather about you accurate and up-to-date. But whilst we work very hard to make sure mistakes don't happen, we need your help, too.

The accuracy and integrity of our surveys and the data we collect is reliant on your honesty in relation to the information you provide in respect of your account and your responses to surveys.

So please ensure that the information you provide is correct. If you have reason to believe any of the information we collect on you may be inaccurate, please contact us (see below for how to do this).

YOUR RIGHTS

You are perfectly within your rights to ask us whether we hold information about you and if so, for us to give you certain details about that information and/or the information itself. This right is commonly known as "right of access" and the request itself is a 'subject access request'. Certain exemptions and conditions apply to this right, principally that it should be in writing and that you give us reasonable details about the information you want.

Depending on your country of residence or domicile, you may have additional or different rights to those set out above concerning the information we collect from you and your devices. We will, of course, honour all such legal rights if we are bound to do so.

You have the right to **request rectification** of your data, for instance if any data you have provided to us needs to be corrected. You can also **request erasure** of your personal data to have your data deleted and **data portability**, meaning we can transfer your data back to you or to another controller at your request. As an alternative to requesting the erasure of your data you also have the **right to restrict processing**, this means that you can limit the way that we use your data. You also have the right to **object to the processing** of your personal data at any time which

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allows you to stop or prevent us from processing your personal data, it may also only relate to a particular purpose we are processing your data for.

If a consent form was issued and completed at any stage of one of our research jobs then you do have the right to withdraw consent at any stage, please note that by doing so, your further participation in the research could be hindered or terminated as your consent would form a vital part of our ability to conduct the research

We reserve the right to charge you a small administration fee to meet our costs in honouring your legal rights, where permitted by the relevant law.

We also reserve the right not to comply with any enquiries or requests we receive about the information we collect, where we may lawfully do so. For example, if we have reason to believe that a request is malicious, technically impossible, involves disproportionate effort or could be harmful to others.

Murmur does not undertake automated decision making including profiling.

If you have any worries or complaints about the way we use your information, please don't hesitate to get in touch with us by emailing privacy@murmurresearch.com. We'll do our very best to set your mind at rest or if anything is wrong to put things right.

If you have concerns about our information rights practices then you can make a complaint to the ICO who are the supervisory authority. Follow this link if you wish to do so <https://ico.org.uk/make-a-complaint>

UPDATES TO THIS PRIVACY POLICY

We will need to update this policy from time to time as our business changes. Please check this policy periodically to see if any amendments or updates have been made.

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ABOUT US

Our full legal name is Murmur Research & Consultancy Ltd, Company number 10675653 and our address can be found in the 'contact us' section below.

We are a Full member of Market Research Society (MRS)

We are registered with the ICO, the details of our Data Protection Officer are as follows:

Name: Nicola McKilligan

Address: 18 Holly Road Farnborough Hampshire GU14 0EA

Email address: dpomurmur@privacypartnership.com

Telephone number: +44 (0)20 7733 1706

CONTACT US

If you would like to contact us with any questions you may have regarding our privacy policy, how your data is controlled/processed, or to lodge a complaint, then please email or write to us via the following locations: email: privacy@murmurresearch.com
Contact Address: 232 Turney Road, London. SE21 7JL

Thank you very much for taking the time to read this document.

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