

PRIVACY NOTICE

Version date: 1 June 2019

Hanbury Strategy and Communications Limited (collectively “**Hanbury**”, “**we**”, “**us**” or “**our**”) respects your privacy and is committed to protecting your personal data. This privacy notice (“**Notice**”) describes our policies and procedures regarding personal data that we collect when you take part in polls or surveys, through or in connection with the use of our services, or in connection with the use of any websites or applications linking to this Notice, including (without limitation) <https://hanburystrategy.com/> (our “**Websites**”).

It is important that you read this Notice together with any other notice or statement we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we use your information. This Notice supplements other notices and statements that we may provide and is not intended to override them.

Hanbury reserves the right to change, modify and update this Notice from time to time by posting a revised version on our Website. Therefore, we recommend that you regularly consult this Notice to make sure that you are aware of any changes. The most recent version of this Notice is reflected by the version date located at the top of this Notice.

A. General

In many cases, Hanbury is the “controller” of your personal data, as defined by the EU General Data Protection Regulation 2016/679 (the “**GDPR**”). This means we determine the purposes and means of processing your personal data.

In other cases, Hanbury will collect your personal data on behalf of our customers. In such cases, we will process this data as a “processor” on behalf of our clients who will be the “controller” of your personal data. In such cases, we will let you know which entity is the controller of your personal data when you provide it, e.g. when you take part in polls or surveys etc. For the avoidance of doubt, Hanbury is the “controller” of, and is responsible for, <https://hanburystrategy.com/>.

If you have any questions or comments about this Notice or our privacy practices, please contact us:

By email: info@hanburystrategy.com

By phone: +44 020 3870 1117

By post: [68-80 Hanbury Street, London, E1 5JL](#)

B. What is “personal data”?

The term “personal data” as used in this Notice shall mean any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier or one or more factors specific to you. “Personal data” includes special categories of personal data and “pseudonymised” personal data but excludes anonymous information or information from which the identity of an individual has been permanently removed.

C. What personal data do we collect?

We may collect and process personal data in the following ways:

- **Personal data provided to us.**

Customers, partners, survey and poll respondents, and visitors to our Websites provide personal data to us in many ways, for example by filling in forms, requesting information, requesting services, subscribing to materials or marketing communications, responding to surveys and polls run on behalf of our customers, and corresponding with us by post, phone, email or otherwise. Such personal data provided may include:

- First and surname
- Telephone number;
- Email address;
- Home and/or work address;
- Date of birth;
- Gender;
- Annual income (including household annual income);
- Professional history;
- Academic/education history;
- Your opinion and views on a range of corporate, brand, social and political matters; and
- Communication preferences.

Special categories of data:

Some opinion and demographic information collected as part of our polling and survey activities will include “special categories of data” which are more sensitive and require more protection under data protection law. For instance, we may collect information about your:

- Racial or ethnic origin;
- Political opinions (e.g. how you intend to vote in an election);
- Sexual orientation;
- Religious beliefs;
- Philosophical beliefs; and
- Health, e.g. data relating to whether you receive disability and sickness benefits.

The provision of these types of information is entirely voluntary and we will not collect them unless you have explicitly consented to such collection. If you change your mind, you may withdraw consent at any time, at which point we will anonymise or no longer continue to process such data.

D. Purposes for which we process personal data

We are committed to processing your personal data in accordance with the law and in a fair and transparent manner. For each purpose of processing identified below, we will only do so on the following legal bases – where:

- Processing is necessary for the performance of a contract between you and us or to answer questions or take steps at your request prior to entering into a contact

- Processing is necessary in our legitimate business interests, (provided such interests are not overridden by your interests or fundamental rights).
- You have provided your consent to processing (which may be withdrawn at any time).
- We are required by law to do so.

Contract: We will process personal data for the following purposes as is necessary for the performance of a contract between you and us or to answer questions or take steps at your request prior to entering into a contact:

- To administer or otherwise carry out our obligations in relation to any agreement to which we are a party;
- To respond to queries or requests and to provide services and support;
- To provide after sales customer relationship management;
- To create and manage our customer accounts;
- To notify you about changes to our services; and
- To administer a survey or poll.

Legitimate interests/consent: We will process your personal data for the following purposes as necessary for certain legitimate interests, or where you have given your informed consent to such processing as required by applicable law (such consent can be withdrawn at any time):

- To send you communications about surveys and polls;
- To invite you to participate in a poll or survey;
- To process your survey or poll responses;
- To offer our services to you in a personalised way;
- To allow you to participate in interactive features of our services; and
- To send you personalised marketing communications

Explicit consent: We will process your special category data for the following purposes where you have given your explicit consent to such processing as required by applicable law (such explicit consent can be withdrawn at any time):

- To process your survey or poll responses where such responses include special category data; and
- To transfer your survey or poll responses to our customers where such responses include special category data.

Legitimate interests: We will process your personal data for the following purposes as necessary in our legitimate business interests, (provided such interests are not overridden by your interests or fundamental rights):

- To resolve disputes;
- To develop and improve our products and services;
- To administer our Websites and for internal business administration and operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- As part of our efforts to keep our Websites safe and secure; and
- To comply with applicable law, for example, in response to a request from a court or regulatory body, where such a request is made in accordance with the law.

We may also process your personal data in order to protect your vital interests or the vital interests of another person, including (without limitation) if we have significant concerns about your health and/or wellbeing.

Where we process personal data on behalf of customers as a “processor”, we do not own such information and we will only use it to provide our services in compliance with this Notice and our contractual obligations.

E. Marketing communications

We will only send you direct marketing communications related to our products and services or surveys and polls if you have first given your consent to receiving that marketing. We will ask for your consent when you first provide your personal data. You can choose to stop receiving direct marketing communications from us at any time simply by following the “Unsubscribe” or “Manage Email Preferences” link at the bottom of any promotional email you receive from us. Please note that you may not opt out of receiving non-promotional emails regarding your account or your transactions with us unless you cease to subscribe to our services.

F. Disclosure of personal data

We will not sell, hire out or pass on your personal data to third parties, except in the situations provided for in this Notice or unless you provide prior consent. We may share personal data with:

- Subsidiaries, branches or associated offices;
- Outsourced service providers or suppliers.
- Our data centre provider and web hosting provider;
- Our advertising partners who enable us to deliver personalised ads to your devices or similar advertising where you have given your consent, if required by the applicable law;
- Our marketing partners, subject to your consent, who may contact you by post, email, telephone, SMS or by other means. If you do not wish to be contacted, you may unsubscribe by notifying us at info@hanburystrategy.com or by clicking "Unsubscribe" in the message concerned;
- Analytics and search engine providers that assist us in the improvement and optimisation of our Websites. Your personal data is generally shared in a form that does not directly identify you;
- Customers, where we collect and process your personal data on their behalf as a “processor” (we will inform you of the identity of such customers when we collect your personal data); and

- Customers to whom we provide various research insight, polling and survey solutions. Data collected from survey and poll respondents will be anonymised and shared with customers.
- Another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event. In the case of a merger or sale, your personal data will be permanently transferred to a successor company. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Notice;
- Public authorities where we are required by law to do so;
- Our advisors, if required, in order to receive legal advice; and
- Any other third party where you have provided your consent.

We will only transfer your personal data to trusted third parties who can: (1) provide sufficient guarantees of their technical and organisational security measures governing the processing of personal data; and (2) demonstrate a commitment to compliance with those measures. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Where third parties are processing personal data on our behalf, they will be required to agree, by contract or otherwise, to process personal data in accordance with applicable law. This contract will stipulate, among other things, that the third-party and its representative shall act only on our instructions, or as permitted by law.

G. International transfer of personal data

We may transfer your personal data to a third party in countries outside the country in which it was originally collected for further processing in accordance with the purposes set out above. In particular, your personal data may be transferred to our outsourced service providers located abroad. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation, contractual or other lawful means. Please contact info@hanburystrategy.com for a copy of the safeguards which we have put in place to protect your personal data and privacy rights in these circumstances.

H. Retention of personal data

We store personal data, in a form that permits us to identify you, for no longer than is necessary for the purpose for which the personal data is processed. We store your personal data as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We may keep an anonymised form of your personal data, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so.

Please contact us at info@hanburystrategy.com for further details about our data retention periods.

I. Data subject rights

In certain circumstances you have rights under the GDPR in relation to personal data we hold about you – specifically the right to:

- request access to your personal data;

- request correction of your personal data;
- request erasure of your personal data;
- object to the processing of your personal data;
- request restriction of processing your personal data; and
- request transfer of your personal data to a third party.

To exercise your rights, please contact us using the contact details provided in [Section A](#) above.

If you send us a letter, please provide your name, address, email address and detailed information about the personal data you would like to update, modify or delete or any other changes you would like to make, or right you would like to exercise.

We aim to respond to requests made by you within one month, but may extend that period by two further months where necessary.

We will not charge a fee for you to exercise any of the rights listed above, but reserve our right to charge a reasonable fee, or to refuse to act on requests which are manifestly unfounded or excessive.

Where you believe that we have not complied with our obligations under this Notice or European data protection law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK's Information Commissioner's Office.

J. [Links](#)

The Websites may, from time to time, contain links to and from the websites of our partner networks, advertisers, affiliates and other third parties. If you follow a link to any of these websites, please note that these websites may have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.