

Privacy Policy for Direct Marketing Recipients

1.1 Identity and contact details of the data controller

Alterline is the data controller for data that we hold for direct marketing purposes. We always identify ourselves and our contact details in any direct marketing that we send.

Alterline's identity and contact details

Name: Alterline Research Limited

Company registration number: 7426250

Manchester address: The Edge Business Centre, Clowes Street, Manchester, M3 5NA

Telephone number: 0161 503 5760

Managing Director: Nick Carley

Managing Director email address: nick.carley@alterline.co.uk

Data protection lead: Laura Dennis

Data protection lead email address: laura.dennis@alterline.co.uk

NB: The data protection lead is not a data protection officer.

1.2 Purpose of the data processing and the lawful basis for the processing

Processing purpose

Alterline processes personal data for direct marketing purposes. The personal data that Alterline processes for direct marketing purposes contains only business contacts. This includes generic company contacts (e.g. info@companyname.co.uk), which are not covered by the GDPR, or specific employees of companies and other corporate bodies (e.g. name@companyname.co.uk), which are covered by the GDPR. These contacts may be gathered from information that is in the public domain or may have been given to Alterline by the contacts themselves.

Lawful basis for the processing

Legitimate interest: The lawful basis for processing this personal data is 'legitimate interest'. It is within the legitimate interest of Alterline to market our products and services to business contacts who work in the sectors that we conduct independent research for, to sell our services as a business. Consent is not needed to process personal data that are in the form of business contacts; however, Alterline always includes a way for specific business contacts to unsubscribe from receiving direct marketing, should they wish. Processing of business contacts in this way is necessary in order for Alterline to tell potential customers/clients about our products/services. Business contacts are likely to reasonably expect that they may be contacted by companies who can provide them with a service that is relevant to the sector/role they work in and can benefit them in some way. This type of processing is not likely to have a significant impact on the individual personally as it is done in a business context. All GDPR principles and e-privacy laws are complied with when Alterline sends direct marketing.

1.3 Categories of personal data

The personal data that Alterline processes for direct marketing purposes may contain the following fields:

Organisation - Name

Organisation - Address

Organisation - Sector

Organisation - Twitter

Organisation - Website

Organisation - Phone number (switchboard)

Organisation - Number of customers

Organisation - Annual turnover

Person - Name

Person - Phone

Person - Email

Person - Role

Person - Twitter

Person - Job title

Person – LinkedIn

Other information about your relationship with Alterline and/or the projects you are interested in or are involved in may be kept alongside this information.

1.4 Who will personal data be shared with?

If Alterline is going to share or receive personal data with a third party, we always ensure that a data processing agreement is signed first or due diligence is carried out to ensure the sharing of data is done in a GDPR compliant manner.

1.5 Transfer of personal data to another country

Alterline will only transfer personal data outside of the UK under one or more of the following conditions:

- a) It is being transferred to a country which is inside the European Economic Area (EEA)
- b) It is being transferred to a country for which an 'adequacy decision' has been made
- c) Alterline and the receiver have entered into a contract which includes standard data protection clauses adopted by the Commission called a 'Standard Contractual Clause'.

If at least one of the above conditions is not met, Alterline will not transfer personally identifiable data outside of the UK.

If Alterline receives personal data from a country inside the EEA after 31st December 2020 and if an adequacy decision has not already been made about the United Kingdom, Alterline will enter into a contractual agreement with the data sender which contains a 'Standard Contractual Clause' if required to do so by the data controller.

Your personal data may be stored on Mailchimp or Pipedrive or encrypted using Axcrypt on Dropbox. Please see below for information about these.

Pipedrive

Alterline use 'Pipedrive' as a data processor to store our personal data that we use for direct marketing purposes. Pipedrive complies with the GDPR. For more information please click the link below:

<https://www.pipedrive.com/en/privacy>

Mailchimp

Alterline use 'Mailchimp' as a data processor to store our personal data that we use for direct marketing purposes and to send out direct marketing emails. Mailchimp complies with the GDPR. For more information please click the link:

https://mailchimp.com/legal/privacy/?_ga=2.259396938.1314038275.1524142435-1053869604.1524142435

Dropbox

Alterline uses Dropbox to:

- Store and share (between employees) anonymised and/or pseudonymised data for research purposes

- Store and share (between employees) personal data for research purposes which is encrypted using Axcrypt
- Store and share (between employees) personal business to business data for marketing purposes which is encrypted using Axcrypt
- Store and share (between employees) other files which do not contain personal data.

Standard Contractual Clause

The GDPR states that personal data shall not be transferred to a country or territory outside the EEA unless the rights of the individuals in respect of their personal data is protected in another way.

Data which Dropbox stores can be transferred to the US and therefore outside of the EEA. However, one of the ways in which this can be done within GDPR compliance is for both parties to agree to a 'Standard Contractual Clause'. The contract which Alterline has with Dropbox as a Dropbox Business customer included a 'Standard Contractual Clause'. This is deemed an appropriate safeguard by the Information Commissioner's Office as it ensures that both Alterline and Dropbox are legally required to protect individuals' rights and freedoms for their personal data. .

Dropbox complies with the EU-US Privacy Shield Frameworks. Adhering to the Privacy Shield Principles ensures that an organisation provides adequate privacy protection under the GDPR. You can view Dropbox's privacy shield certificate here:

<https://www.privacyshield.gov/participant?id=a2zt0000000GnCLAA0&status=Active>

Alterline does not store any unencrypted Personal Data on Dropbox. However, Dropbox is covered by the Privacy Shield, which allows us to store personal data on it under the GDPR.

ISO

The International Organization for Standardization (ISO) has developed a series of world-class standards for information and societal security to help organisations develop reliable and innovative products and services. Dropbox has certified its data centres, systems, applications, people and processes through a series of audits by an independent third party, the Netherlands-based EY CertifyPoint.

ISO 27001 (Information Security Management): ISO 27001 is recognised as the premier information security management system (ISMS) standard around the world. The standard also leverages the security best practices detailed in ISO 27002. To be worthy of your trust, Dropbox continually and comprehensively manages and improves its physical, technical and legal controls. Their auditor, EY CertifyPoint, maintains its ISO 27001 accreditation from the Raad voor Accreditatie (Dutch Accreditation Council). Follow the link below to view Dropbox's ISO 27001 certificate:

<https://www.dropbox.com/static/business/resources/dropbox-certificate-iso-27001.pdf>

ISO 27017 (Cloud Security): ISO 27017 is a new international standard for cloud security that provides guidelines for security controls applicable to the provision and use of cloud services. Follow the link below to view Dropbox's ISO 27017 certificate:

<https://www.dropbox.com/static/business/resources/dropbox-certificate-iso-27017.pdf>

ISO 27018 (Cloud Privacy and Data Protection): ISO 27018 is an emerging international standard for privacy and data protection that applies to cloud service providers like Dropbox which process personal information on behalf of their customers and provides a basis on which customers can address common regulatory and contractual requirements or questions. Follow the link below to view Dropbox's ISP 27018 certificate:

<https://www.dropbox.com/static/business/resources/dropbox-certificate-iso-27018.pdf>

Some third-party apps with Dropbox integration ask for permission to access Dropbox accounts. We do not give permission to third-party apps on our Dropbox account.

While the measures that Dropbox takes offer good security which allows for the storage of personal data, we take an extra step to ensure that we safeguard the personal data that we process.

Personal data which is stored on Dropbox is encrypted using AxCrypt software.

Axcrypt

Alterline use Axcrypt to encrypt single files. Axcrypt uses AES-128 encryption. To find out more about Axcrypt security, please click the following link:

<https://www.axcrypt.net/information/security/>

1.6 Retention period or criteria used to determine the retention period

Alterline does not keep personal data longer than is necessary. There is no time limit on this for data that we hold for marketing purposes, as it is necessary to keep your personal data as long as you may still have an interest in our products or services. We will erase/amend any personal data that we hold if we are requested to do so by the data subject or we become aware that you are no longer in that role.

1.7 The existence of each of data subject's rights

The right to be informed

On all direct marketing to named business contacts, Alterline provides instructions on how to opt out of receiving direct marketing from Alterline and a record is kept (a suppression list) of people who have opted out. All new contacts are screened against this list. Alterline also always identifies who we are, and we give our contact information. All direct marketing informs the data subject of the reason for which they are being contacted, and also has a link to Alterline's GDPR/privacy policy.

The right of access

For data of which Alterline is the data controller, data subjects have a right to request access to any information which Alterline holds about them if it is linked to their personal data in any way. If Alterline receives a subject access request, it is Alterline's policy to record the request, respond within two weeks and provide the data to the individual within one month, to comply with the GDPR standards. However, Alterline strives to respond to requests and provide information as soon as possible, which tends to be sooner than the GDPR standard. The identity of the individual is confirmed before personal data is shared, by asking data subjects to confirm at least two pieces of personal information that we hold (or one if only one piece is held). If data that is held is no longer personally identifiable in any way, then subject access requests may be denied. If data subjects request access to data of which Alterline is the data processor, we will inform the data controller and it will deal with the subject access request. Alterline will share relevant personal data that we hold with the data controller to comply with the request.

The right to rectification

For personal data of which Alterline is the data controller, data subjects have a right for their data to be rectified if they believe it is inaccurate or incomplete. If Alterline receives a request to rectify personal data from an individual who we hold data about, it is Alterline's policy to record the request, respond to that request within two weeks and make the rectification within one month, to comply with the GDPR standards. However, Alterline strives to respond to rectification requests as soon as possible, which tends to be sooner than the GDPR standard. The identity of the individual is confirmed before personal data is rectified, by asking data subjects to confirm at least two pieces of personal information that we hold (or one if only one piece is held). If data that is held is no longer personally identifiable in any way, then rectification requests may be denied. If data subjects request rectification to data of which Alterline is the data processor, we will inform the data controller and it will deal with the request. Alterline will rectify data at the request of the data controller.

The right to erasure, the right to object and the right to restrict processing

For personal data of which Alterline is the data controller, data subjects have a right to object to the processing of their personal data and/or to withdraw their consent to their data being processed at any point. This can include asking Alterline to erase any personal data that we hold, restrict processing of that personal data, or object to a type

of processing that Alterline is completing where the data has been collected with consent or legitimate interest as the lawful basis for processing. Data subjects are given details of how to withdraw their consent and/or request any of the above. If a request for erasure, an objection or a request to restrict processing is received by Alterline, it is Alterline's policy to record the request, respond to that request within one week where necessary (responses will not be made to straightforward unsubscribe requests) and ensure the request is dealt with within two weeks. Alterline strives to respond to these requests as soon as possible. If data which is held is no longer personally identifiable in any way, then requests may be denied. If a request for erasure is made, this also involves erasing data from our suppression lists which does mean that subjects are at risk of being contacted in the future if their data is received by Alterline at a later date by other means. If data subjects object or withdraw their consent to Alterline processing data of which we are the data processor, we will cease communication with the data subject and inform the data controller. We will then act upon the request at the instruction of the data controller.

1.8 The right to lodge a complaint with a supervisory authority

You have a right to lodge a complaint with the data controller (Alterline) – please see the contact details in section 1.1 if you would like to make a complaint. If you are still not satisfied, you have a right to contact the Information Commissioner should you wish, using the Information Commissioner helpline: 0303 123 1113.

1.9 Source of the personal data

Personal data held by Alterline for marketing purposes may be gathered from information which is in the public domain or may have been given to Alterline by the contacts themselves. If for any reason Alterline has received from a third party your personal data which is not already in the public domain, we will state where we have received your personal data from.