

Arete Research Services LLP

Privacy Notice for Recipients of Research Services

Arete Research Services LLP (“Arete”) is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of personal data that we collect and process about recipients of our research services. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

1. Who we are

Arete is a data controller, meaning that it determines the processes to be used when using your personal data. You may contact us at:

Privacy Officer
Arete Research Services LLP
5-8 Hardwick Street
London
EC1R 4 RG
Tel: 0207 959 1300
E-mail: dataprivacy@arete.net

2. Data protection principles

In relation to your personal data, we will:

- Process it fairly, lawfully and in a clear, transparent way
- Collect your data only for specified and specific purposes
- Only collect the minimum information we need to meet the purpose
- Only use it in the way that we have told you about
- Ensure it is correct and up to date
- Keep your data for only if we need it
- Process it securely, reducing the risk of it being lost or stolen

3. What data we collect about you

Personal data means any information capable of identifying an individual. We may process certain types of personal data about you as follows:

- **Identity Data** - may include your first and last name
- **Contact Data** - may include your email address and telephone number
- **Profile Data** - may include your username and password and your research preferences
- **Usage Data** - may include information about how you use our website, products and services
- **Technical Data** - may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access our website

Where we are required to collect personal data by law, or under the terms of the contract between us, you and/or your employer, if you do not provide us with that data when requested, we may not be able to perform the contract. If you don't provide us with the requested data, we may have to

cancel our services with you or your employer. We do not collect sensitive data on our client contacts or data of anyone under the age of 16.

4. Why we process your data

There are six lawful reasons for processing personal data, which are:

- You give consent for us to process your data;
- It is necessary to fulfil a contractual obligation;
- There is a regulatory obligation on us to do so;
- It is in the legitimate interest of Arete to do so;
- It is in the public interest to do so; and
- It is in your vital interest to do so.

We hold the following personal data of recipients of our research services:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new client contact	<ul style="list-style-type: none"> ▪ Identity data ▪ Contact data ▪ Profile data 	<ul style="list-style-type: none"> ▪ Performance of a contract with you or your employer ▪ Necessary to comply with our legal obligations to know our clients
To manage our ongoing relationship with you	<ul style="list-style-type: none"> ▪ Identity data ▪ Contact data ▪ Profile data ▪ Usage data 	<ul style="list-style-type: none"> ▪ Performance of a contract with you or your employer ▪ Necessary to comply with our legal obligations to know our clients ▪ Necessary for our legitimate interests in delivering our services
To administer and protect our business and our website	<ul style="list-style-type: none"> ▪ Identity data ▪ Contact data ▪ Profile data ▪ Usage data ▪ Technical data 	<ul style="list-style-type: none"> ▪ Necessary for our legitimate interests for running our business ▪ Provision of administration and IT services and network security ▪ Necessary to comply with our legal obligations to know our clients
To use data analytics to improve our website, products and services,	<ul style="list-style-type: none"> ▪ Profile data ▪ Usage data ▪ Technical data 	<ul style="list-style-type: none"> ▪ Necessary for our legitimate interests to define types of clients for our products and services, to keep our site updated and relevant, to develop our business strategy ▪ Necessary for our legitimate interests to keep our records updated and to study how clients use our products and services

We may process your personal data for more than one lawful purpose. Please email us at dataprivacy@arete.net if you need details about the specific legal basis we are relying on to process your personal data where more than one basis has been set out in the table above.

5. How we collect your data

We collect personal data about you through a variety of different methods including:

- **Direct interactions:** You may provide data when filling in forms on the website (or otherwise) by communicating with us by phone, email, or otherwise, including when you subscribe to our services, create an account on our website and/or request resources to be sent to you.
- **Automated technologies or interactions:** As you use our website, we may automatically collect technical data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. Please see our Cookie Policy for further details.

- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources, such as Bloomberg or LinkedIn

6. Sharing your data

Your data will be shared within Arete where it is necessary for staff to undertake their duties in the provision of services to you or your employer. As part of email and server back-up services, we also share some of your data with outsourced IT providers (Microsoft and Global Relay). We may also share your data with third parties to comply with a legal obligation upon us. Whilst your data is stored by third parties within the EEA, we do share access to your data with our offices in US and Hong Kong, and as such outside the European Economic Area and we will share that data under standard contractual clauses.

7. Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. In addition, third parties must implement appropriate technical and organisational measures to ensure the security of your data (see privacy policies of IT providers [Microsoft](#) and [Global Relay](#)).

8. How long we keep your data for

We only keep your personal data for as long as necessary and in accordance with our legal and regulatory obligations. As a result, whilst an organisation remains a client of Arete, we retain all data relating to that client relationship. Once a company is no longer a client of Arete, we keep all data for seven years, other than personal contact and access information, which will be deleted after two years.

9. Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- **The right to be informed:** This means that we must tell you how we use your data, and this is the purpose of this privacy notice.
- **The right of access:** You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our Subject Access Request policy which is available from our Privacy Officer.
- **The right for any inaccuracies to be corrected:** If any data that we hold about you is incomplete or inaccurate, you can require us to correct it.
- **The right to have information deleted:** If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it.
- **The right to restrict the processing of the data:** For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct.
- **The right to portability:** You may transfer the data that we hold on you for your own purposes.
- **The right to object to the inclusion of any information:** You have the right to object to the way we use your data where we are using it for our legitimate interests.

- **The right to regulate any automated decision-making and profiling of personal data:** You have a right not to be subject to automated decision making in way that adversely affects you.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases we may continue to use the data where so permitted by having a legitimate reason for doing so. If you wish to exercise any of the rights explained above, please contact our Privacy Officer at dataprivacy@arete.net.

10. How to complain

We strive to meet the highest standards when collecting and using personal information. Complaints are taken very seriously, and data subjects are encouraged to bring any issues to our attention. To do this either e-mail or write to:

Privacy Officer
Arete Research Services LLP
5-8 Hardwick Street,
London
EC1R 4RG
Tel: 0207 959 1300
Email: dataprivacy@arete.net

The supervisory authority in the UK for data protection matters is the Information Commissioner's Office (ICO). If you think your data protection rights have been abused or breached in any way by us, you are able to make a complaint to the ICO at <https://ico.org.uk/concerns/>. or by post, telephone or email:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
Email: casework@ico.org.uk.

4 December 2018