

Privacy Policy

Last updated – June 2019

1. Introduction

1. Please read the following privacy policy carefully. It sets out the basis on which we, Behaviour Lab Limited (**Behaviour Lab, we or us**) will collect, process and use any personal data that we collect about you.
2. In this policy, **personal data** means any personally identifying information about you or other information from which you can be identified. This may include your name and contact details but will also include other information relating to you as described below.
3. We reserve the right to make changes to this privacy policy from time to time. These will be on our website, so please make sure you have seen the latest version. If appropriate, we may contact you with details of any significant changes we make.
4. We will handle personal data you provide to us in accordance with applicable law including, but are not limited to, the EU General Data Protection Regulation (**GDPR**), the UK Data Protection Act 2018 (**DPA**) and other applicable laws (together **Data Protection Law**).
5. If you would like to exercise any of your legal rights under Data Protection Law or if you have any other questions in relation to this privacy policy, please contact us at -info@behaviourlab.com.

2. The personal data that we collect about you

1. We collect personal data or other information you provide to us, when you:
 1. Contact us to make an enquiry;
 2. Engage us to provide services or deal with us in the course of our services;
 3. Provide your personal data to us when you agree to take part in our research, analysis or any follow-up work;

4. Apply to work with us or become part of our team;
 5. Otherwise interact with us face to face, online or elsewhere.
2. The personal data we collect may include name and contact details, job title, job responsibilities, information regarding how you have carried out those responsibilities, research interview responses and results of a personality assessment.
 3. We will collect personal data contained in any communications directed to us. For example, if you send us a message using social media we may keep a record of that communication.
 4. We collect personal data about you from your employer when you agree to take part in our research, analysis or any follow-up work regarding how your job title, job responsibilities and information regarding how you have carried out those responsibilities
 5. We may also collect certain information about your visits to our website using 'cookies' or similar tracking technology. This may include your location, IP address, device information, browser type, length of visit, page views and similar information. We may use this information for a number of purposes including administration, reviewing performance of our website or for security reasons.

3. Use of your personal data

1. Personal data about you will be used for:
 1. dealing with your enquiries or issues you wish to raise;
 2. providing our services. This may include conducting interviews/research with you. From the data you and others provide, we apply analytic technologies and behavioural science methodologies to assess how you and other individuals within our clients make decisions. The results of the assessment will be set out in a report presented to the relevant client only;
 3. contacting you with further information about our services or any changes;
 4. other purposes we tell you about and that you consent to from time to time.
2. In addition to the above, we may use your personal data and other information for the following:
 1. management and administration of our business;

2. developing and improving our services;
3. to create statistical information. We may publish or provide third parties with this statistical information but it will be anonymised so that no one can be personally identified from it;
4. recording marketing preferences and sending direct marketing communications with news about our people, products, services or events. Where direct marketing is conducted electronically (such as by email or SMS) and where required under applicable law, we will only send this to private individuals where we have their prior consent or if they are a client; and
5. for security purposes. For instance, in monitoring our IT systems.

4. Disclosure of your data

1. Other than as stated in this policy or permitted under Data Protection Law, we will not externally share, sell or distribute any of the personal data you provide to us.
2. We may sometimes disclose your personal data to third parties as follows:
 1. to our service providers, who handle that data on our behalf and in accordance with our instructions (called **data processors**). These data processors include our data hosting providers, technology partners and other parties we use to help us provide our services. They may also include third-party payment processors or parties who we use to administer our business;
 2. if our business or substantially all of our assets are acquired by a third party, in which case personal data held by us about our clients or contacts will be one of the transferred assets although your data will continue to be used for the same purposes as set out hereunder;
 3. where disclosure is necessary to establish or enforce our legal rights or deal with legal claims. This may include, without limitation, disclosure to our professional legal advisers or to our insurers for that purpose; or
 4. where disclosure may be required by law such as to a court or competent relevant authority, such as HMRC or another tax authority.

Where personal data is shared by us externally, we will endeavour to ensure that information is only used in accordance with Data Protection Law.

5. Third party content on our website

1. Our website may contain links to other websites that are operated by third parties.
2. We do not control these third-party websites and this privacy policy does not apply to them. Any information such third parties collect by virtue of you clicking on a link on our website will be collected and used in accordance with the privacy policy of that third party. Please therefore consult the terms and conditions and privacy policy of those third party websites to find out how they may use your personal data.

6. Security of your data

1. We employ appropriate technological and operational security measures to protect personal data we hold against any unauthorised access, any unlawful processing or loss.
2. Data transmission over the internet can be insecure and, although we employ appropriate technological and organisational security measures to protect your data from unauthorised access, we cannot guarantee the security of any data sent over a public communications network.
3. For security purposes, we may also monitor and block emails that are sent to us which are suspicious or we believe may contain attachments or content likely to disrupt or damage our systems.

7. International data transfers

1. The personal data that we collect will usually be stored in the United Kingdom. Sometimes however, we may engage back-office technology or data hosting providers who act as our data processors but use equipment located in the United States and other countries outside of the EU/EEA.
2. The United States is one of the countries outside the EU/EEA whose laws are currently not considered to meet the same legal standards of protection for personal data as those set out under the EU GDPR. However, we will only transfer personal data out of the UK or the EU/EEA under an appropriate contract or other legally authorised method to make sure that such data is appropriately safeguarded.

8. How long do we keep your personal data for?

1. The period for which we keep your personal data usually depends on the purpose for which such information was collected in the first place.
2. We have a data retention policy that sets out the different periods we retain personal data for in accordance with our duties under Data Protection Law.
3. The criteria we use for determining relevant data retention periods are based on:
 1. Whether we need to keep data to comply with a contract obligation we owe and to be able to deal with future legal claims or to enforce our rights. This is usually the legal limitation period under applicable law;
 2. Various legislative requirements – for example, duties under tax law to hold financial transaction details and accounting records; and
 3. Guidance issued by the government or relevant regulatory authorities under Data Protection Law.

Personal data that we no longer need to hold is securely disposed of and/or anonymised, so each individual it relates to can no longer be identified from it.

9. Lawful basis for processing your personal data under Data Protection Law

1. In accordance with the GDPR, we process your personal data relying on one or more of the following lawful grounds:
 1. where we agree to provide a service to you, in order to take any pre-contract steps at your request and/or to perform our contract obligations to you;
 2. where we need to use your personal data for our legitimate interests of being able to market and provide our services to clients and administer our business. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your legal rights and freedoms and, in particular, your right of privacy;
 3. where you have freely provided your consent to us using your personal data for a particular purpose or purposes;

4. where we need to use such data to protect your vital interests or those of someone else (such as in a medical emergency); and/or
 5. we need to collect, process or hold your personal data to comply with a legal obligation.
2. If we collect any sensitive personal data (or 'special category' personal data) about you such as data relating to health, ethnic origin, political, religious or philosophical beliefs, generic/biometric data used to identify you and any data relating to sex life, we will only do this with your explicit consent; to protect your vital interests or those of someone else; where you have publicised such information; and/or, where we need to use such data in connection with a legal claim.

10. Your legal rights if you are located in the UK or European Union (EU)

1. If you are an individual located in the UK or EU, you have certain legal rights under the GDPR as follows:
 1. You have the legal right to request information about the personal data that we hold about you, what we use that personal data for; who it has been disclosed to, as well as certain other related information (called a subject access request).
 2. You also have the following rights, which are exercisable by making a request to us in writing:
 1. that we correct personal data that we hold about you which is inaccurate or incomplete;
 2. to object to any automated processing that we carry out in relation to your personal data;
 3. to object to our continued use of your personal data to send you direct marketing;
 4. to require us to erase your personal data without undue delay and/or to object to or to restrict the use of your personal data by us unless we have a legitimate reason for continuing to hold or use that data (e.g. in relation to a legal claim); or
 5. that we transfer your personal data to another party where the personal data has been collected with your consent or is being used to perform contract with you

personally and we are processing that data by automated means (i.e. on computer).

3. If you are not satisfied with our response to a request you have made or believe that we are illegally processing your personal data, you have the right to complain to the data protection regulator in the country where you are located. If you live in the United Kingdom, the relevant regulatory authority is the UK Information Commissioner's Office (ICO) – for more information, see: <https://ico.org.uk/concerns/>.

11. Complaints and Mandatory Law

1. If you have any questions or concerns about how we use your personal data – even if you are not located in the EU – please contact us at the address in the Introduction above.
2. When you make any request, we may ask you to provide us with appropriate evidence to verify your identity before we can respond.
3. This privacy policy is without prejudice to any mandatory rights that you have under applicable Data Protection Law in the territory where you are located or reside.