



Privacy Policy

Loyalty Chain are committed to protecting and respecting every individuals' privacy. We take our responsibilities regarding the security of information that we collect seriously. We will always protect data, be clear about the data we collect and the reasons why. We do not and will not sell data to third parties. This privacy policy sets out how Loyalty Chain use and protect the information that is provided to us. Please read this policy carefully. If you have any questions, please contact us at the email address: compliance@loyaltychain.co.uk.

Loyalty Chain

This privacy policy is for: Loyalty Chain Ltd. 41 Burton Road, Repton. Derbyshire. DE65 6FN. Company number 7127414

What information Loyalty Chain collect and what it is used for

People who contact Loyalty Chain with a request for information: For individuals who request information from Loyalty Chain, we will collect and process the personal data that they provide to respond to the request. We will only use the personal data to provide the information they have requested. We may collect some or all the following personal data (this may vary according to the request):

- Name
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession

Marketing communications with current and potential customers: Loyalty chain use the information we collect or receive, such as email address, phone number, postal address, to communicate directly with customers. We may ask them to consent to emails, containing initiatives or updates, or other forms of contact. Customers not wanting to receive such communications, will be given the option to unsubscribe or change their preferences. Potential customers who do not have a relationship with us, for example, we have identified them from public domain information, and we believe they may have an interest in our services, we shall rely on legitimate interests to engage in correspondence and communication. *See the section on Individual Rights.*

Individuals who participate in our market research or health outcomes research projects: Loyalty Chain uses data provided by their customers, third parties or public domain information to recruit participants to our market research and health outcomes research projects. In some circumstances a

member of Loyalty Chain may contact individuals directly to ask them to participate in a project. We will always process individual's personal data by obtaining their explicit consent. This means that before we collect any information from individuals we ensure that they are provided with full details about the purpose and nature of the project and what will happen to the information collected. All information provided will remain confidential and will only be reported to the commissioning customer combined with other respondent's data so there is no information that can identify individuals, unless they have given specific consent to the contrary. Loyalty Chain will only collect and use the information provided for the purposes of our research with individuals explicit consent. We collect data in our studies for market research and health outcomes research purposes only, and our use of that information will be limited to that purpose. Research participation is voluntary, and individuals can withdraw consent at any time throughout the process. In some cases, Loyalty Chain may need to share personal information with third parties that provide research services to support the research project. Any third party that receives personal information is obligated to follow all the same privacy protection regulations as followed by Loyalty Chain. We do not rent, sell or give personal information to any third party for direct marketing any products or services. We will not send individuals unsolicited mail or pass on their email addresses to others for this purpose.

Sharing personal data: In the relatively few instances where Loyalty Chain ask individuals for permission to pass data on in a form which allows them to be personally identified, we will ensure that the information will be used only for the purposes stated. We process individual's personal data by obtaining their explicit consent. Before we share individual data, we ask them if they are prepared to pass data on in a form which allows them to be personally identified. We will provide them with the following information, so they can decide if they wish to consent.

- To whom they will be identified
- What will happen to the information they give
- What, if anything, will happen to them because of agreeing to provide this information?

For example, individuals may be re-contacted for further information. Video or audio recordings where they have given their permission to share the recording of their interview with the commissioning customer company, Loyalty Chain would not disclose names or contact details.

Companies are under a strict legal obligation not to try and identify individuals from any video or audio recording. If Loyalty Chain share video or audio recordings we obtain individuals explicit consent by providing them with information on the customer company, the usage of the recording and who will view/listen to the recording. This will be stated in a consent form which we will ask individuals to read understand and confirm their acceptance. The customer company will also sign a form confirming that will only use the recording as agreed by everyone.

Adverse drug reaction reporting Loyalty Chain are required by the customer commissioning the research and regulatory bodies to pass on details of adverse events and product complaints for any of the customers' products, mentioned during research interviews and activities. This is solely for drug safety to fulfil their obligation to the regulatory authorities. The processing may take place outside the European Economic Area ("EEA"), or the country where the interview took place. Individuals will only be identified in these reports where they have expressly given their permission. Individuals will be asked at the end of the interview if they give their consent to be identified so drug safety can follow up with them if required. Individuals do not need to provide their details and Loyalty Chain will report the adverse events/product complaints anonymously. At the end of the project Loyalty Chain will check with the customer's drug safety department to ensure that all reports have been safely received. At that point any contact details on the reporting form will be removed by Loyalty Chain and they will keep the form without any personal information. Only drug

safety will have individual contact information. The drug safety department of the commissioning customer may require that individual information be available for review. This will be solely for drug safety to fulfil their obligation to the regulatory authorities. To fulfil this obligation, Loyalty Chain will keep any audio recording of interviews for up to 10 years for drug safety purposes only. Drug safety will need to apply to Loyalty Chain in writing as to the purpose of the review, who will review and how long drug safety will keep audio recordings. We will obtain individual explicit consent to keep the audio recording. After 10 years the audio recording will be securely destroyed.

3rd Party Survey Web Hosting: Loyalty Chain on occasions use a 3rd party supplier, Snap Surveys, to host their online surveys via the service Snap WebHost. Snap WebHost acts as data a processor in the collection of data. The website below provides information about the Snap WebHost service and outlines the features and functionality that helps Loyalty Chain meet the GDPR obligations:

<https://www.snapsurveys.com/gdpr>

How long does Loyalty Chain keep personal data for?

The length of time Loyalty Chain holds personal information varies depending upon the type of information and its use. We will hold individual's personal information on our systems only for as long as necessary to provide the services that customers have requested, or for such other essential purposes such as complying with legal obligations, resolving disputes, and enforcing our agreements. Loyalty Chain keeps a backup of their data to restore the original data after a data loss event. This backup is encrypted, and password protected. Respondent names and contact details for use in market research projects are deleted at the end of the project.

Who do Loyalty Chain share the information with? Loyalty Chain use selected 3rd parties to process information on their behalf, such as software providers to host and capture surveys and respondents via a website. Such third parties will be authorised to process individual information but only to fulfil their contractual obligations to Loyalty Chain and will not be permitted to use it for any other purpose. We retain full responsibility for how personal information may be used by such organisations. The personal data that Loyalty Chain collects from individuals may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). By submitting personal data, individuals agree to this transfer, storing or processing. Loyalty Chain will take all steps reasonably necessary to ensure that individual data is treated securely and in accordance with this privacy policy. Loyalty Chain does not sell, trade or rent your personal information.

How Loyalty Chain protects information?

Loyalty Chain store and process information within the European Economic Area (EEA). Where we need to transfer your information outside of the European Economic Area we only do so to countries which have been determined by the European Commission to have an adequate level of data protection. To protect personal data Loyalty Chain employ:

- Technical measures, including but not limited to, robust network security, anti-virus protection, regular internal and external oversight and inspection, including penetration testing, access controls, audit trails, encryption of devices and data both whilst at rest and during any transmission to and from third parties to keep personal data secure.
- Organisational measures including, but not limited to, training of individuals who process personal data in data protection and information governance, the creation of and adherence to appropriate policies and procedures.

Individual Rights:

Loyalty Chain will be as open as it can be in terms of giving people access to their personal information. Individuals have specific rights connected to provision of their personal information to Loyalty Chain. These include rights to request what personal information Loyalty Chain may hold about them, if any, and for what purposes. Individuals have the right to request that Loyalty Chain:

- Change the consent which they have provided to in relation to their personal information
- Correct any inaccurate or incomplete personal information which we may hold about them
- Provide them with a complete copy of their personal data
- Provide them with a complete copy of their personal information for them to move elsewhere where they have provided this information by consent or by a contract with Loyalty Chain
- Temporarily restrict the processing of their personal information, whilst an objection from them is being resolved
- Permanently erase all personal information promptly, and confirm to them that this has been done (there may be reasons why we may be unable to do this)
- Stop the processing of their personal information for direct marketing
- Withdraw consent that they have provided to process their personal information, at any time
- Object to profiling or to any decisions being taken by Loyalty Chain by automated means. If individuals have a concern about the way Loyalty Chain are collecting or using their personal data, or if we do not address their request, or fail to provide them with a valid reason why we have been unable to do so, individuals have the right to contact the Information Commissioner's Office (ICO) to make a complaint. The ICO can be contacted via their website <https://ico.org.uk>

How can individuals access their information?

Individuals can request to access any personal information that they have submitted to Loyalty Chain. The easiest way is to request a copy via the contact details listed below or send us an email: compliance@loyaltychain.co.uk

Loyalty Chain Ltd.
41 Burton Rd,
Repton
Derbyshire
DE65 6FN

Individuals should ensure that they include their name and clear instructions on what they would like Loyalty Chain to do. If individuals require us to supply them with details of the personal information that we hold about them, then we will provide this information free of charge and we will provide this information to them within one month of their request unless the request is complex or is numerous requests. If this is the case Loyalty Chain will inform individuals within one month of their request about the reason for the extension of time.

Changes to this privacy policy:

Loyalty Chain keep their privacy policy under regular review and reserve the right to revise it at any time. Any changes we may make to the privacy policy in the future will be posted on the website.

There is a date at the bottom of the page which indicates the date it was updated. Individuals should revisit this policy each time they consider giving personal information.

How to contact Loyalty Chain?

If individuals have any questions or comments about Loyalty Chain's privacy policy or any other aspect of the website, or wish to review or request a change to any personally identifiable information that has been submitted to Loyalty Chain via our site, please contact us at the postal address or email address listed below

If individuals would like to contact the Information Commissioner's they can be contacted via their website <https://ico.org.uk>

This policy was last updated on the 25th May 2018.