

# PRIVACY AND COOKIES POLICY

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information.
- 1.2 We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.
- 1.3 This website is owned and operated by Keystone Market Research Ltd.
- 1.4 We are registered in England and Wales under registration number 14655564, and our registered office is at Cottons Chartered Accountants, The Stables, Daventry, NN11 4BL.

## 2. Collecting personal information

- 2.1 In conjunction with GDPR legislation we may collect, store and use the following kinds of personal information:
  - (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
  - (b) information that you provide to us when registering with our website (including your email address);
  - (c) information that you provide for recruitment purposes (including your name, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details);
  - (d) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);
  - (e) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
  - (f) information relating to any purchases you make of our goods and/or services or any other transactions that you enter into through our website (including your name, address, telephone number and email address);
  - (g) information that you post to our website for publication on the internet (including your user name, your profile pictures and the content of your posts);

- (h) information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication); and
- (i) any other personal information that you choose to send to us.

2.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

### 3. **Personal information we receive from other sources**

3.1 We may receive information from third parties who collect personal information from you and pass it on to us. For example: (i) our staff may give us emergency contact information as part of our emergency scenario planning and details of their dependents and of other people in relation to their employee benefits arrangements; (ii) your employer may provide your Personal Information to us in connection with a service they provide to us or in connection with services that we provide to our customers; and (iii) we may receive information from past employers and others concerning your employment history where you apply for a job with us. Where this is the case the third party is responsible for informing you that your information will be shared, but once we are holding it, we will only handle it in accordance with this policy.

### 4. **Using personal information**

4.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.

4.2 We may use your personal information to:

- (a) administer our website and business;
- (b) personalise our website for you;
- (c) enable your use of the services available on our website;
- (d) send you goods purchased through our website;
- (e) supply to you services purchased through our website;
- (f) send statements, invoices and payment reminders to you, and collect payments from you;
- (g) send you non-marketing commercial communications;
- (h) send you email notifications that you have specifically requested;
- (i) send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
- (j) send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or by email or similar technology (you can inform us at any time if you no longer require marketing communications);

- (k) provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- (l) deal with enquiries and complaints made by or about you relating to our website;
- (m) with your express consent, provide third parties with your information for the purpose of them contacting you to provide requested services or information or to help deal with your enquiry;
- (n) process your job application or Curriculum Vitae for the purposes of recruitment if you have requested this;
- (o) keep our website secure and prevent fraud; and
- (p) verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service).

4.3 If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us.

4.4 Your privacy settings can be used to limit the publication of your information on our website, and can be adjusted using privacy controls on the website.

4.5 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

## 5. **Sensitive personal information**

5.1 If you provide us with some special categories of personal information ("sensitive personal information") the provision of this sensitive personal information is entirely voluntary and where you provide such information to us, for example, you may provide us with information about your dietary or medical requirements or you may disclose details of any physical disabilities prior to attending an interview with us, by providing us with this sensitive personal information you consent to our processing of this type of personal information so that we can better provide the services you have requested. We shall endeavour to only process this information to the extent strictly necessary after which we will promptly delete such information. Sensitive personal information that we may receive in connection with our services includes personal information relating to your religion, philosophical beliefs, political opinions, mental or physical health or condition (including any dietary or medical requirements or conditions) and sexual orientation.

## 6. **Disclosing personal information**

6.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy.

- 6.2 We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.
- 6.3 We may disclose your personal information:
- (a) to the extent that we are required to do so by law;
  - (b) in connection with any ongoing or prospective legal proceedings;
  - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
  - (d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
  - (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- 6.4 Except as provided in this policy, we will not provide your personal information to third parties.
7. **Your rights**
- 7.1 You may choose to restrict the collection or use of your personal information in the following ways:
- (a) there are various tick-boxes on our website which you can use to indicate your preference to receive our marketing – or not to receive it;
  - (b) if you have been receiving marketing from us but change your mind and decide you don't want to hear from us you can unsubscribe by clicking on the 'unsubscribe' link at the bottom of any emails you receive from us, or by emailing us at [charlotte@keystonemr.co.uk](mailto:charlotte@keystonemr.co.uk); and
  - (c) if you have previously agreed to us sharing your personal information with third parties for direct marketing purposes, you may change your mind at any time by using the unsubscribe option in the relevant communication, contacting us at [charlotte@keystonemr.co.uk](mailto:charlotte@keystonemr.co.uk) or contacting the third party directly.

- 7.2 You are entitled to know some details about the personal information we hold about you and how that information is processed. If you would like to request this, please contact us at [charlotte@keystonemr.co.uk](mailto:charlotte@keystonemr.co.uk) and we will provide you with the information to which you are entitled.
- 7.3 You have the right to request that we correct any personal information that we are holding about you that is incorrect or incomplete. You also have the right to ask us to erase or stop processing any personal information we have about you where there is no longer a legal ground for us to hold it and, in some circumstances, you have the right to request that we transfer any information we hold about you to a third party. If you wish to exercise any of these rights, please contact us as soon as possible, at [charlotte@keystonemr.co.uk](mailto:charlotte@keystonemr.co.uk). We will promptly correct any information found to be incorrect.
8. **International data transfers**
- 8.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- 8.2 Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.
- 8.3 You expressly consent to the transfers of personal information described in this Section 8.
9. **Retaining personal information**
- 9.1 This Section 9 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 9.2 Personal information that we process for any purpose shall not be kept for longer than is necessary for such purpose.
- 9.3 Notwithstanding the other provisions of this Section 9, we may retain documents (including electronic documents) containing personal data:
- (a) to the extent that we are required to do so by law;
  - (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings;
  - (c) to the extent required in the normal course of business by our standard Records Management Policy and practices; and

- (d) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## 10. **Security of personal information**

- 10.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- 10.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- 10.3 All electronic financial transactions entered into through our website will be protected by encryption technology.
- 10.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 10.5 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

## 11. **Amendments**

- 11.1 We may update this policy from time to time by publishing a new version on our website.
- 11.2 You should check this page occasionally to ensure you are aware of any changes to this policy.
- 11.3 We may notify you of changes to this policy by email or through the private messaging system on our website.

## 12. **Your rights**

- 12.1 You may instruct us to provide you with any of your personal information we hold; provision of such information will be subject to your provision of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank, plus an original copy of a utility bill showing your current address).
- 12.2 We may withhold personal information that you request to the extent permitted by law.
- 12.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 12.4 Under Article 17 of GDPR legislation individuals have the right to have personal data erased in certain circumstances. If you would like to exercise this right you can notify us verbally or in writing to our main office or [charlotte@keystonemr.co.uk](mailto:charlotte@keystonemr.co.uk). Requests will usually be processed

within a month and without charge. However if the request is complex, manifestly unfounded or excessive, then we reserve the right to refuse or request additional time to fulfil the request, or we may charge a reasonable fee for processing the request.

### 13. **Third party websites**

13.1 Our website includes hyperlinks to, and details of, third party websites.

13.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

### 14. **Updating information**

14.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

### 15. **About cookies**

15.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

15.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

15.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

15.4 Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

### 16. **Our cookies**

16.1 We use both session and persistent cookies on our website.

### 17. **Analytics cookies**

17.1 We use Google Analytics to analyse the use of our website.

17.2 Our analytics service provider generates statistical and other information about website use by means of cookies.

17.3 The analytics cookies used by our website have the following names:  
[ga, \_gat, \_\_utma, utmt, utmb, \_\_utmc, utmz and utmv].

17.4 The information generated relating to our website is used to create reports about the use of our website.

17.5 Our analytics service provider's privacy policy is available at:  
[<https://www.google.com/policies/privacy/>].

## 18. **Third party cookies**

18.1 Our website also uses third party cookies.

18.2 We publish Google AdSense interest-based advertisements on our website. These are tailored by Google to reflect your interests. To determine your interests, Google will track your behaviour on our website and on other websites across the web using the DoubleClick cookie. You can view, delete or add interest categories associated with your browser by visiting: <http://www.google.com/settings/ads/>. You can also opt out of the AdSense partner network cookie using those settings or using the NAI's (Network Advertising Initiative's) multi-cookie opt-out mechanism at: <http://www.networkadvertising.org/choices/>. However, these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-in available at: <https://www.google.com/settings/ads/plugin>.

## 19. **Blocking cookies**

19.1 Most browsers allow you to refuse to accept cookies; for example:

- (a) in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
- (b) in Firefox (version 47) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
- (c) in Chrome (version 52), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

19.2 Blocking all cookies will have a negative impact upon the usability of many websites.

19.3 If you block cookies, you will not be able to use all the features on our website.

## 20. **Deleting cookies**

20.1 You can delete cookies already stored on your computer; for example:



- (a) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>);
- (b) in Firefox (version 47), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and
- (c) in Chrome (version 52), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

20.2 Deleting cookies will have a negative impact on the usability of many websites.

## 21. **Copyright**

- 21.1 © Keystone Market Research Ltd. All rights, save as expressly granted, are reserved. Reproduction in any form of any part of the contents of this website without our prior written consent is prohibited.
- 21.2 The trademarks, logos, images, photographs and service marks ("Marks") displayed on this website are the property of Keystone Market Research Ltd or other third parties. Users are not permitted to use these Marks without the prior written consent of Keystone Market Research Ltd, or such third party which may own the Mark.

## 22. **Telephone Calls**

- 22.1 Telephone calls may be recorded.

## 23. **Internet Communications**

- 23.1 In order to maintain the security of its systems, protect its staff and detect fraud and other crimes, we reserve the right to monitor all internet communications, including web and email traffic, into and out of its domains. Monitoring includes (without limitation) checks for viruses and other malignant code, and use or content that is unauthorised or unlawful or material that may cause offence in any way.

## 24. **Complaints**

- 24.1 Should you have any queries or complaints in relation to how we use your personal information, please contact us at [charlotte@keystonemr.co.uk](mailto:charlotte@keystonemr.co.uk). Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office regarding such issues.

## 25. **Changes to this policy**

- 25.1 Any changes we make to this policy in the future will be posted on our website and, where appropriate, notified to you when you next access our website or otherwise request services from us. It is your responsibility to ensure that you are aware of the latest version of this policy and by continuing to use our website, request services from us or otherwise engage with us, you will be deemed to have accepted any revised terms.

## 26. **Our details**

- 26.1 Our Registered Office is at Cottons Chartered Accountants, The Stables, Daventry, NN11 4BL.
- 26.2 You can contact us:
- (a) by post, using the postal address of our registered office given above;
  - (b) using our website contact form;
  - (c) by telephone, on the contact number published on our website from time to time; or
  - (d) by email, using [charlotte@keystonemr.co.uk](mailto:charlotte@keystonemr.co.uk) or the email address published on our website from time to time.