

Eunomia Privacy Statement

Last Reviewed: 7th June 2019

Eunomia is committed to protecting data and respecting the privacy of persons it deals with. This Privacy Statement explains when and why we collect personal information about individuals, how we use it, the conditions under which we may disclose it to others, the lawful basis for processing, retention periods and how we keep it secure. Eunomia Research & Consulting Limited is registered with the Information Commissioner's Office, registration number ZA168907.

Under the General Data Protection Regulations 2018 (GDPR), you have rights as an individual which you can exercise in relation to the information we hold about you. You can read more about these rights here – [ICO - is my information being handled correctly.](#)

1.0 Personal Data

Eunomia stores and processes data that relates to individuals from inside and outside of the company in strict compliance with the GDPR. This may involve business associates, clients, contractors, or people identified during research or survey work. These data may be obtained via verbal, written or electronic media and typically include name, telephone number, and email address. The information is retained for as long as it is necessary for the purposes set out below.

For client projects, where we are a Data Controller under the GDPR, we obtain consent from the individual to use personal data unless it is reasonable to assume they would give consent. The data are secured and deleted according to contractual and legal protocols.

We also process some personal information as part of our core business activities without requesting explicit consent from the individual. We do this for at least one of the following purposes:

- To enhance our services to the benefit of our clients;
- To improve the security and risk profiling of existing and future business relationships; or
- To communicate with clients and business partners in order to develop new business opportunities.

1.1 Access to Personal Information

Eunomia aims to be as open as it can, in terms of giving individuals access to their personal information. You can find out if we hold any personal information by making a Subject Access Request under the GDPR. We will not make a charge for this information, however if the request is particularly complex or if there are numerous requests, then the timescale for our response may be extended. If we need to ask for such an extension, we will notify you of the extension within

one month of the receipt of the Subject Access Request, including the reasons for the delay. If we do hold information about you we will give you a copy of the data, tell you why we are holding it, and tell you who it is being disclosed to. On rare occasions we may refuse requests if, for example this involves the disclosure of another individual's data or for legal reasons.

To make a request for access to any personal information we may hold, you need to put the request in writing, addressing it to dataprotection@eunomia.co.uk, or by writing to our postal address provided below.

You may also object to this processing or wish to make corrections to the data. If you wish to make any such request please make this clear in your request.

2.0 The Eunomia Website

We use [Google Analytics](#) to collect internet information such as number of visitors to our website www.eunomia.co.uk. Our website search and decision notice search is powered by [Wordpress](#). Search queries and results are logged anonymously by our Marketing team to help us improve our website and search functionality. No user-specific data are collected by either Eunomia or any third party.

Eunomia uses a third party service, [Marcom](#) to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to the Eunomia website.

Any cookies that may be used by this website are used either solely on a per session basis or to maintain user preferences. Cookies are not shared with any third parties. You can read more about how we use cookies on our [cookies](#) webpage.

2.1 E-newsletter

We use a third party provider, [Mailchimp](#), to deliver our monthly e-newsletters. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter.

2.2 Registration to Access Information

When individuals or a business fills in registration forms to obtain information via our website, they are asked to provide the contact details of the relevant person. This information is used for Eunomia's marketing purposes only, and will not be shared with any third parties, or used for other purposes.

2.3 Persons under Sixteen

Eunomia is committed to protecting the privacy of children that visit our website, and who are under the age of sixteen years old. With this in mind, visitors to our website that are under the age of sixteen are requested to obtain the permission of their parent or guardian, prior to submitting personal information onto our website.

2.4 Links to other Websites

This privacy notice does not cover the links within our website which redirect you to other websites. We encourage you to read the privacy statements on any other websites you visit, to satisfy yourself that those organisations comply with protecting your personal information under GDPR.

3.0 Social Media

We use third party providers such as [LinkedIn](#), [Twitter](#), [YouTube](#), and [Instagram](#) as platforms for our social media interactions. If you send us a private or direct message via social media, the message will be stored by these sites in accordance with their privacy policies.

4.0 Email

We use [Westgate IT](#) to encrypt and protect email traffic. If your email service does not support this organisation, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

5.0 Recruitment

Eunomia Research & Consulting Ltd is the Data Controller under the GDPR definition for the information you provide during the recruitment process, unless otherwise stated.

All of the information you provide during the process will only be used for the purpose of assessing the suitability of your employment and progressing your application, or to fulfil statutory requirements. We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

We will not share any of the information you provide during the recruitment process with any third parties. The information you provide will be held securely by us, whether the information is in electronic or physical format.

In the event that we use any third party data processors they are prohibited from doing anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we specify.

5.1 Application Process

When you apply, your information will be processed by our in-house HR team. We may also obtain personal data about candidates from an employment agency, and other parties, including referees, former employers and employees.

We will ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our HR & Admin team will have access to all of this information.

5.1.1 Assessment

We need to confirm the identity of our staff, their right to work in the relevant country we expect them to be based, and seek assurance as to their capability, trustworthiness, integrity and reliability.

We may ask you to attend an interview or undertake some form of psychometric (or other) testing. Personal information will be generated by you and by us. For example, you might complete a written test or we might take interview notes.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we may contact you should any further suitable vacancies arise. After this period, your details will be deleted unless you give us consent to retain them for a longer period.

If we make a conditional offer of employment we will ask you for proof of your identity and qualifications. You will be asked to attend our office with original documents and we will take copies.

5.1.2 Offer

If we make a final offer and you accept the offer, we will ask you for the following information:

- Bank details – to process salary payments;
- Emergency contact details – so we know who to contact in case you have an emergency at work; and
- Equal opportunities details.

5.1.3 Employment

If you are recruited, we are legally required to hold some types of information about you to fulfil our statutory obligations. For example, under UK tax law, we are required to keep basic personal data on our employees for a minimum of seven years, after which time it will be destroyed, unless the employee gives us their permission to retain their information for the purpose of employment reference provision.

Other than to serve any compliance purposes, we hold employee personal information on our systems for as long as it serves the direct administrative and business development interests of Eunomia, defined as 'legitimate interests' under the GDPR.

6.0 Complaints and Queries

Eunomia intends to meet all statutory rules and standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage anyone with a concern to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If we receive a complaint from a person, we create a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we receive to process the complaint and to check on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that, however, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files for two years after resolution of the complaint. It will be retained in a secure environment and access to it will be restricted to key personnel only.

This privacy notice does not provide exhaustive detail of all aspects of Eunomia's collection and use of personal information, but we are happy to provide any additional information or explanation needed.

If you want to make complaint, request any other information about our privacy policy or have any further queries, you can email us at dataprotection@eunomia.co.uk or write to us at Eunomia Research & Consulting Limited, 37 Queen Square, Bristol, United Kingdom, BS1 4QS.