

## Introduction

Oxygen Brand Consulting is a company registered in England and Wales, company registration number 3842229. **Oxygen Brand Consulting** is a registered Data Controller with the [Information Commissioner's Office](#), registration number Z937946X. **Oxygen Brand Consulting** abides by the the Market Research Society ("**MRS**") Code Of Conduct and the European Society for Opinion and Market Research ("**ESOMAR**") Code Of Conduct. We understand the importance of information security and data privacy and adhere to both the Data Protection Act ("**DPA**") and the European Union's General Data Protection Regulation ("**GDPR**").

This Privacy Statement describes the processes that Oxygen Brand Consulting engages in with regard the capture, storage, processing, retention of personal data via; our websites, engaging in our internally-hosted surveys, accessing externally hosted partner surveys, or when interacting with us via other means e.g. email.

## GDPR, privacy regulations and the MRS code

The **GDPR**, which is effective from 25<sup>th</sup> May 2018, governs how we capture, process, store and secure personal data. In addition to this regulation, we abide by prevailing privacy legislation, the **MRS** Code Of Conduct and the **ESOMAR** Code Of Conduct.

## Information we gather for market research

In the course of a market research project we will capture various pieces of data that pertain to each participant in the research project. All of this data is necessary for us to deliver a market research service.

The table below summarises the types of data we capture, along with additional information regarding the reason for capture, how the data is processed, the duration of storage and the security of the data.

Data	Purpose	Processing	Retention	Security
<b>Registration data</b> e.g. name, address, date of birth, username, email address, telephone number etc.	This data is required to identify an individual for identity validation. This data is mandatory in order to be take part in research with Oxygen Brand Consulting. Under <b>GDPR</b> the legal basis for processing of this data is 'contract'.	This data is processed at the point that someone registers with Oxygen Brand Consulting, including sending the registration email and validation link, undergoing proprietary checks to validate the authenticity of the person. Thereafter, the contact details are used to deliver suitable survey opportunities to the registered member.	This data is retained for the duration that the project is being undertaken. In order to support fraud prevention processes, we may also retain some of this data following the end of the project. This allows us to cross-reference historic data with any data provided to us in future projects. We are also required to retain this data alongside financial transaction data for a period of 7 years in order to meet our legal obligations in relation to financial auditing. Whilst GDPR provides individuals with the 'right to be forgotten', and for certain data to be erased at their request, some of this data is exempt	This data is stored in a database that has controlled user access, those users only being allowed access for the purpose of fulfilling their remit e.g. to contact Oxygen Brand Consulting research respondents to deliver or exclude from survey opportunities, or for the general administration of their account.

			from an individual's right to be forgotten. We will delete this data following a period of 5 years beyond the retention period required to meet our legal obligations for financial auditing purposes.	
<p><b>Profiling data</b>          Pertaining to Oxygen Brand Consulting survey participants e.g. which make and model of car they own, which sports they play/watch, which banking provider they have financial products with etc.</p>	<p>This data is used to further classify survey participants. Under <b>GDPR</b> the legal basis for processing of this data is 'legitimate business interest'.</p>	<p>This data is processed at the point of undertaking analysis of survey results. The data is also used to select suitable respondents (or to exclude them, where the data suggests they do not fall into the required target profile) for further questioning in a study.</p>	<p>This data is retained for the duration of the project that Oxygen Brand Consulting is conducting. Once an Oxygen Brand Consulting research participant asks to finish or the project is completed, this profile data is deleted. This data can be changed or by the research participant at any time within their time taking part in a project. Similarly, consent to process this data can be withdrawn at any time, however in doing so the respondent may become ineligible to take part in the survey.</p>	<p>This data is stored in a database that has controlled user access, those users only being allowed access for the purpose of fulfilling their remit e.g. to contact research participants to deliver survey opportunities to them, or to exclude them from survey questioning.</p>
<p><b>Sensitive personal data</b>          classed as any data pertaining to; race, ethnic origin, political beliefs/affiliation, sexual orientation or medical conditions.</p>	<p>Sometimes we need to understand attitudes based upon an individual's sensitive personal data e.g. those with a certain medical condition or those of a particular ethnic background. This data is used by us in the same way as profiling data, however it is distinguishable under <b>GDPR</b> as 'sensitive personal data' and so we treat it separately. Under <b>GDPR</b> the legal basis for processing of</p>	<p>This data is processed at the point of undertaking projects to classify respondents responses (or to exclude them, where the data suggests they do not fall into the required target profile).</p>	<p>This data is retained for the duration of the project. Once a respondent finishes the project or asks to withdraw this sensitive personal data is deleted.</p>	<p>This data is stored in a database that has controlled user access, those users only being allowed access for the purpose of fulfilling their remit e.g. to contact respondents to deliver survey opportunities to them, or to exclude them from surveys for which they do not fall into the required target profile.</p>

	this data is 'consent'.			
<p><b>Survey data</b> Gathered at the point a Oxygen Brand Consulting member responds to a survey invitation, engages with our survey platform, or our external partners' survey platforms.</p>	<p>In order to register the entry to and exit from a survey, allowing us to record participation and prevent re-entry to a survey, plus the responses provided during a survey (in the case of our internally hosted surveys). Under <b>GDPR</b> the legal basis for processing of this data is 'legitimate business interest'.</p>	<p>We will log each entry attempt to a survey, including the IP address used, browser used, geographic location and date/time. We will also log the exit from a survey, including the status and date/time. Where a survey is hosted internally on our survey platform, we will also record the responses submitted to each survey question in order to analyse the survey data and report this to our clients in aggregate form. The exit from a survey will also trigger a record of their participation, including any reward earned, where applicable.</p>	<p>Survey entry and exit data will be stored for a period of 12 months from participation in order to allow for re-invitation or exclusion as may be necessary with certain projects. This information will also allow us to deal with any survey-related enquiries presented to us. The data relating to payments made to respondents will be stored for financial auditing purposes, for a minimum of 6 years following the financial year in which that entry was created. The actual responses provided within one of our internally hosted surveys will be stored alongside the unique ID of the respondent until the aggregated reporting outputs are supplied to our client. At that stage, we will delete the unique ID from the survey data such that the survey responses can no longer be attributed or linked to the respondents. Survey data captured by our partners' survey platforms is not stored on Oxygen Brand Consulting systems and is subject to their retention and processing policies, which should be equivalent to those</p>	<p>This data is stored in a database that has controlled user access, those users only being allowed access for the purpose of fulfilling their remit e.g. to deliver re-contact survey questions to them.</p>

			of Oxygen Brand Consulting and verifiable at the point of entering each survey.	
<p><b>Financials data</b> Pertaining to rewards earned during the survey</p>	<p>This data is logged against each respondent in order to provide an accurate log of all the rewards earned and paid. This data does <b>not</b> include any bank details that may be provided when submitting BACS withdrawal requests. Under <b>GDPR</b> the legal basis for processing of this data is 'contract'.</p>	<p>This data is processed in order to provide internal reporting to Oxygen Brand Consulting staff and for financial auditing purposes.</p>	<p>In order to comply with financial auditing legislation we have to keep this data for a minimum period of 7 years. This means that we will retain this data for a minimum term even if a respondent is no longer participating in a survey. Whilst GDPR provides individuals with the 'right to be forgotten', and for certain data to be erased at their request, this data is exempt from an individual's right to be forgotten. We will delete this data following a period of 5 years beyond the retention period required to meet our legal obligations for financial auditing purposes.</p>	<p>This data is stored in a database that has controlled user access, those users only being allowed access for the purpose of fulfilling their remit e.g. to review or administer rewards earned or withdrawals made by a respondents, dealing with support enquiries, or for summary reporting of financial transactions across a project.</p>
<p><b>Bank details</b> Where a Oxygen Brand Consulting member opts to be paid via the BACS method</p>	<p>In order to process a rewards withdrawal via the BACS option and to pay such rewards to the account details provided by the registered Oxygen Brand Consulting member. Under <b>GDPR</b> the legal basis for processing of this data is 'contract'.</p>	<p>Bank details are exported once a week to a batch file which is stored temporarily on our secure servers. Those details are then uploaded to the Natwest bank website and processed by them. Once the upload has completed and the details accepted by Barclays bank, the file is hard deleted from our servers.</p>	<p>The bank details provided at the point of submitting a BACS withdrawal request will be stored for a period of up to 7 working days prior to processing the withdrawal, and for a further 14 working days following the processing of the withdrawal. This allows us to process any amendments or queries pertaining to BACS withdrawals.</p>	<p>This data is stored in a database that has controlled user access, those users only being allowed access for the purpose of fulfilling their remit e.g. to process BACS withdrawals or deal with member enquiries pertaining to BACS withdrawals.</p>

## Participation in surveys

Oxygen Brand Consulting invites people to participate in research tasks which often take the form of, or involve, online surveys. Those surveys are hosted by our clients/partners. In order not to influence survey responses, the identity of the client/partner cannot usually be revealed, however it is normally the case that the external survey platform will contain a link to that provider's privacy policy and thus their details will appear within such material.

Participation in Oxygen Brand Consulting surveys is entirely optional. At the point that a survey invitation is sent we will communicate the estimated length of the survey, the reward on offer for successful completion of the survey (which includes passing the associated Quality Control procedures) and a generic indication of the subject matter. Some projects may also include additional briefing information, where there is a specific task that is included as part of the project e.g. reviewing a website, providing diary entries over a specified number of days, or inviting a child or other household member to take part. There is no obligation for anyone to engage in a survey if they choose not to based on the information provided in the survey invitation. Indeed, people can abandon a survey at any time if they choose not to proceed any further.

Data collected in relation to surveys, including entry/exit, survey responses, IP address, date/time and browser used, is captured, stored and processed in line with the table provided above.

## Children

Oxygen Brand Consulting only accepts registrations from UK residents aged over 16. Some of those members may tell us about children they have, and where those children are under the age of 13, additional information may be provided in respect of each child. This information is provided to us by the parent on the basis that they are the 'responsible adult' and so that we may conduct surveys intended for their child(ren) to complete. All such survey invitations will be sent to the parent, who will make a choice as to whether they allow their child to engage in the survey in question. The parent will be asked to confirm their identity and that they are a responsible adult in respect of the child being invited to engage in the survey. The child will also be given an opportunity to not engage in the survey, as there is no obligation for them to do so even if their parent has consented and invited the child to engage in the survey.

Under the **GDPR**, and based on the UK's interpretation of this important legislation, a child aged 13 or over has a legal right to, and control over, any information held about them. Accordingly, we will not retain any data previously supplied to us in relation to a child, at the point that the child reaches the age of 13. Any such data will be automatically deleted from our systems. We will however continue to store data pertaining to the adult in respect of them having a child, the age of that child and their gender as this data is still legally owned by and applicable to the parent. We may use this data to send research opportunities to the parent based on the fact they have a child of a certain age and/or gender.

## Information security

Not only are we obliged to by law, but we take the handling of our members' personal data very seriously. We take great care to store all data securely and to handle all data in line with the service that we provide to our members. Our technical infrastructure adheres to industry best practice and we are ISO27001 accredited. This is the internationally recognised standard relating to Information Security Management Systems.

## Changes to the Privacy Statement

We reserve the right to make changes to this Privacy Statement to reflect changes in legislation, best practice, or simply to reflect improvements or other changes that may be necessary from time to time. We will always notify members of a change having been made, by publishing the updated Privacy Statement on our website. We recommend that members refer to our Privacy Statement regularly in order that they remain familiar with its contents. Continued usage of this website and interaction with Oxygen Brand Consulting reflects continued acceptance of both this Privacy Statement and our Terms & Conditions.

## Your rights

GDPR provides individuals with greater control over their data. Your rights under GDPR are summarised below:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure (often referred to as the 'Right to be forgotten')
- Right to restrict processing
- Right of data portability
- Right to object
- Right to withdraw consent
- Rights related to automated decision making and profiling

- Right to complain to the ICO

To read more about your rights under GDPR, please click here <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

If you wish to exercise any of your rights under GDPR in relation to your relationship with Oxygen Brand Consulting, please send us an email at [info@oxygen.uk.com](mailto:info@oxygen.uk.com)

### **Subject Access Requests**

Under **GDPR** you have a right to access the data that we hold about you – this is known as a Subject Access Request (“**SAR**”).

You can only make a **SAR** in relation to information that Oxygen Brand Consulting holds about you. In exceptional cases, a **SAR** may be requested by someone who has delegated authority to make such a request on behalf of the research participant, however we will require evidence of such authority having been delegated by the participant to whom the **SAR** is applicable. In all cases, we reserve the right to request proof of identity in order to ensure that we are discussing account details and disclosing data only to the person who has a legal right to access such data.

To read more about **SARs** please visit the **ICO** website at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>.

In order to submit a **SAR** to Oxygen Brand Consulting, please send an email to our Data Protection Officer at [info@oxygen.uk.com](mailto:info@oxygen.uk.com) detailing the nature of your request i.e. which data you are requesting and which timeframes the request pertains to.

### **Communicating with Oxygen Brand Consulting**

All enquiries should be directed to [info@oxygen.uk.com](mailto:info@oxygen.uk.com).

### **Contact details**

You can find Oxygen Brand Consulting’s contact details, including postal, telephone and email, below.

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