



Luto.

Luto Research Limited

Privacy Notice

Version 2

Introduction

Luto Research Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

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1. Important information and who we are

Purpose of this privacy notice

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

This privacy policy is issued by Luto Research Ltd so when we mention "Luto" "we", "us" or "our" in this privacy policy, we are referring to Luto Research Ltd. We have appointed a data protection manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the office manager using the details set out below.

Full name of legal entity: Luto Research Limited

Email address: office.manager@luto.co.uk

Postal address: Suite 22, Bradford Chambers Business Centre, New Lane, Laisterdyke, Bradford, West Yorkshire, BD4 8BX

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This version was last updated on 17 February 2021. Historic versions can be obtained by contacting us.

Third-party links

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, photographs, or video recordings of you (for example collected during CCTV surveillance on our property).
- **Contact Data** includes billing address, delivery address, email address and telephone numbers. (Where these are on a B2B basis, these details are usually not your personal details unless you provide them to us for a particular purpose).
- **Financial Data** includes bank account and payment card details, (as above B2B unless you provide them for a particular purpose).
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you use our website, products, and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

The data above may be collected in the context of your actual or potential employment with Luto Research or on CCTV, we will not collect any Identity, Contact, Financial, Transaction data that is personal to you.

The data above may be collected in the context of participation in a research study.

Your name will be collected in relation to any B2B enquiries you make on behalf of your organisation including any email address and other contact details you provide in relation to the same.

Whether or not we collect Technical Data that is personal to you will depend on whether you use your personal or business computer systems. If you use your personal computer, we may collect Technical and Profile and Usage data relating to you.

We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Should you participate in a research study we will collect personal data. The personal data we collect is kept to a minimum but may include age, gender, level of education, health conditions and medication taken.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - join our participant panel or take part in ad hoc research studies
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion, or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below
 - **Technical Data** from analytics providers such as Google based outside the EU;
 - **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services;
 - **Identity and Contact Data** from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into, or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client or as a participant panel member or participant in ad hoc research studies	a. Identity b. Contact	a. Performance of a contract with you
To process and deliver details on Adverse Events that may become evident during participation in a research study	a. Identity b. Contact c. Event details	a. To fulfil a legal obligation to our clients
To process your application for employment or otherwise in the context of your employment	a. Identity b. Contact c. Financial	a. Performance of your employment contract b. Necessary for our legitimate interests (to consider you for employment or otherwise in the context of your employment with us) c. To comply with a legal obligation in the context of your employment d. To protect your vital interests (in the context of any health data you may provide)
To respond to enquiries, you make via the contact form on our website, by phone, email, or post, or at a face-to-face meeting	a. Identity b. Contact For B2B enquiries the contact details you provide will usually be your corporate contact	a. Performance of a contract with you (if we have entered into a contract with you or otherwise agreed to provide products or services to you (this is typically a contract with the organisation with whom you are employed as

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
	details, unless you are a sole trader or partnership.	opposed to a personal contract with you); b. Necessary for our legitimate interests (in order to respond to your enquiry or provide you with useful information about our products and services). This will be for a B2B purpose and we will only use your corporate personal data unless you provide otherwise.
To process and deliver your order including:	a. Identity b. Contact	a. Performance of a contract with you (typically the organisation for whom you work) b. Necessary for our legitimate interests (to make enquiries in relation to your order)
To enable you to partake in a prize draw, competition or complete a survey	a. Identity b. Contact c. Profile d. Usage e. Marketing and Communications	a. Performance of a contract with you b. Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a. Technical	a. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or restructuring exercise) b. Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	a. Identity b. Contact c. Profile d. Usage e. Marketing and Communications f. Technical For B2B the contact details you provide will usually be your corporate contact details unless you are a sole trader or partnership.	a. Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	a. Technical b. Usage	a. Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	a. Identity a. Contact b. Technical c. Usage d. Profile For B2B the contact details you provide will usually be your corporate contact details unless you are a sole trader or partnership.	a. Necessary for our legitimate interests (to develop our products/ services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

- Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information or purchased goods or services from us or if there is otherwise a legitimate business interest (in the context of your corporate personal data unless you are a sole trader or partnership) and, in each case, you have not opted out of receiving that marketing.

- Opting out

You can ask us or third parties to stop sending you marketing messages at any time by [contacting us](#) at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us, as a result of a product/service purchase, product/service experience or other transactions.

- Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

- Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without

your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

External Third Parties as set out in the [Glossary](#).

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We may transfer any personal data we hold to a country outside the European Economic Area ("EEA"), provided that one of the following conditions applies:

- a. the country to which the personal data is transferred to ensures an adequate level of protection for the data subjects' rights and freedoms;
- b. the data subject has given his/her consent;
- c. the transfer is necessary for one of the reasons set out in the Data Protection Legislation, including the performance of a contract between us and the data subject, or to protect the vital interests of the data subject;
- d. the transfer is legally required on important public interest grounds or for the establishment, exercise, or defence of legal claims; or
- e. the transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.

Subject to the requirements in the section above, personal data held by Luto may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. That staff may be engaged in, among other things, the fulfilment of contracts with the data subject, the processing of payment details and the provision of support services.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your

personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by [contacting us](#). By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *[Request erasure]* below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Request access to your personal data

Request correction of the personal data

Request erasure of your personal data.

Object to processing of your personal data

Request restriction of processing of your personal data.

Request the transfer of your personal data to you or to a third party.

Right to withdraw consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

Service providers acting as processors based in the United Kingdom who provide IT and system administration service].

Professional advisers [acting as processors or joint controller] including lawyers, bankers, auditors, and insurers based the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.