



The human understanding agency.

# Welcome to the Walnut Unlimited's participant's privacy notice.

Walnut Unlimited Limited respects your privacy and is committed to protecting your personal data. This privacy notice 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.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

- [1. IMPORTANT INFORMATION AND WHO WE ARE](#)
- [2. THE DATA WE COLLECT ABOUT YOU](#)
- [3. HOW IS YOUR PERSONAL DATA COLLECTED](#)
- [4. HOW WE USE YOUR PERSONAL DATA](#)
- [5. DISCLOSURES OF YOUR PERSONAL DATA](#)
- [6. INTERNATIONAL TRANSFERS](#)
- [7. DATA SECURITY](#)
- [8. DATA RETENTION](#)
- [9. YOUR LEGAL RIGHTS](#)
- [10. GLOSSARY](#)

## **1. Important information and who we are**

### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Walnut Unlimited collects and processes your personal data through your participation our research projects.

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

We identify the controller and who is responsible for your personal data in each study.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

## Contact details

Our full details are:

Full name of legal entity: Walnut Unlimited Limited

Name or title of DPO: Quality manager and Data Protection Officer

Email: [WAL\\_dpo@walnutunlimited.com](mailto:WAL_dpo@walnutunlimited.com) (mailto:WAL\_dpo@walnutunlimited.com)

Postal address:

Winchester: St Swithun's House, 1a St. Cross Rd, Winchester, Hampshire, SO23 9JA

London: 7-11 Lexington Street London W1F 9AF

Telephone numbers:

London: +44(0)207845 8300

Winchester: +44(0)1962 842211

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](http://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

This version was last updated on 27th August 2020

[Back to top](#) 

## 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 as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender
- **Contact Data** includes billing address, delivery address, email address and telephone numbers
- **Financial Data** includes bank account and payment card details. Only in certain circumstances.
- **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, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.

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.

We may collect Special Categories of Personal Data about you for research purposes and will notify you where this is the case (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

[Back to top](#) 

### **3.How is your personal data collected?**

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

- Recruitment for a research project
- Participation in online surveys
- Participation in telephone surveys
- Participation in face-to-face research projects (e.g. interviews and focus groups)
- Participation in studies using passive metering techniques
- Identity and Contact Data from data brokers or aggregators based inside or outside the EU.
- Participation on video or eye-tracking research
- Non-participation in an areas where there is a notification that video or eye-tracking research is taking place.
- Please note that Walnut Unlimited use videos only for research purposes unless specified otherwise up front. Any video recordings are only made available to members of Walnut Unlimited and, when mentioned, clients who are connected with the research. The video will not be used for any purpose other than analysing the results of the research, unless explicitly mentioned.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

### **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:

- Consent
- 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 perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation

See table below to find out more about the types of lawful basis that we will rely on to process your personal data.

### **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
Recruitment in a research project	(a) Identity (b) Contact (c) Opinions (d) Special category data (e) Images (f) Audio	Consent Legitimate interest
Participating in a survey	(a) Identity (b) Contact (c) Opinions (d) Special category data (e) Images (f) Audio	Consent Legitimate interest
Participation in video or eye-tracking research	(a) Identity (b) Contact (c) Opinions (d) Special category data (e) Images	Consent
Non-participant in an area where there is a notification that video or eye-tracking research is taking place	(e) Images	Legitimate interest
Contacting you on behalf of a third party to participate in a research study	(a) Identity (b) Contact (c) Opinions (d) Profile	Consent Legitimate interest
Contacting you based on random sample techniques, e.g. random digit dialling	(b) Contact	Legitimate interest
Contacting you to ensure the quality and validity of our interview by checking that we have recorded an accurate account of your views.	(b) Contact	Legitimate interest
To register you as a new panel member	(a) Identity (b) Contact (c) Opinions (d) Profile	Performance of a contract with you
Performance of a contract with you or manage our relationship with you will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Usage	Performance of a contract with you Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	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 other survey opportunities that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

### Other survey opportunities from third-parties

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.

### Opting out

We provide the opportunity to withdraw your participation from any surveys you are invited to take part in.

### 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. For more information about the cookies we use, please see our [Cookie Policy](#). (/ "cookie-policy")

### 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.

[Back to top](#) 

## 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.

- Internal Third Parties as set out in the Glossary.
- 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

The majority of external data storage used by Walnut is located within the EEA, where possible we ensure EU data centres are used. We use Office 365 and Confront servers located within the EEA. To the extent we transfer data outside of the EEA we will ensure that the appropriate safeguards are in place.

## 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.

[Back to top](#) 

## 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

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.

[Back to top](#) 

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. See below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request correction of your personal data.

- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- 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 a number of requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means using your data in ways you would reasonably expect where it is necessary for us to use your data without giving you full control upfront.

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**

#### **Internal Third Parties**

Other companies in the Unlimited Group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

#### **External Third Parties**

Service providers acting as processors based in EEA and outside EEA who provide research services, including research recruiters, researchers, research tools and research venues, IT and system administration services

Data collected in surveys is stored by industry leading vendor Conformat, subject to high security standards on servers managed by Rackspace UK. The data may be accessed, subject to strict confidentiality obligations, by recipients who are employees of Walnut Unlimited and its affiliated entities, and by our respective sub processors.

Other third parties providing tools and services, such as agency insight tools and CRM services.

## 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.

[Back to top](#) 

 <mailto:info@walnutunlimited.com>  <https://twitter.com/WalnutUnlimited>  
 <https://www.linkedin.com/company/walnut-ltd>  
 <https://www.instagram.com/walnutunlimited/>

Walnut Unlimited. Powered by the Unlimited Group  <https://www.unlimitedgroup.com/>

[Home](#)

<https://www.walnutunlimited.com>

[Vacancies](#)

<https://www.walnutunlimited.com/work-with-us/>

[Called by us..?](#)

<https://www.walnutunlimited.com/called-by-us/>

[T&Cs](#)

<https://www.walnutunlimited.com/terms-conditions/>