

Data Protection Policy

The Data Controller of Hiddensee Research Ltd (“Hiddensee”) is James Ridgewell. Hiddensee is a limited company registered in England and Wales (registration number 10528525) the registered office of which is at 20-22 Wenlock Road, London N1 7GU. You can contact the Data Controller by e-mailing James Ridgewell at ridgewell@hiddensee.co.uk

Hiddensee has no Data Processors, in relation to personal data. Hiddensee is registered with the Information Commissioner’s Office reference number: ZA493413

Purpose of Policy

This Privacy Policy sets out how we, Hiddensee, collect, store and use information about you when you use our website, <http://www.hiddensee.co.uk>, and where we otherwise obtain or collect information about you. The reasons for the policy are to comply with the law, follow good practice, to protect clients, staff and other individuals and to protect the company.

Types of Data

We collect individual information from our company staff and consultants, and individual and company information from consumers of our research. We also gather data from shareholders and potential shareholders, and from prospective clients and employment candidates.

Policy Statement

This Data Protection Policy complies with both the law and good practice and respects individuals’ rights. Hiddensee will be open and honest with individuals whose data is held and provide training and support for staff who handle personal data, so that they can act confidently and consistently.

In the event of data breaches, the Supervisory Authority (the Information Commissioner’s Office) will be notified within 72 hours. In addition, for major breaches the data subjects will be notified without delay. A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Responsibilities

The Board / Company Directors: the Board has overall responsibility for ensuring that the Hiddensee complies with its legal obligations.

Data Protection Officer: the Data Protection Officer is James Ridgewell. His responsibilities include:

- 1) Briefing the Board on Data Protection responsibilities;
- 2) Reviewing Data Protection and related policies;
- 3) Advising other staff on Data Protection issues;
- 4) Ensuring that Data Protection induction and training takes place;
- 5) Notification to the Information Commissioner’s Office if required;
- 6) Handling subject access requests;
- 7) Approving unusual or controversial disclosures of personal data;

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8) Approving contracts with Data Processors.

Employees: all staff, affiliates and consultants must read, understand and accept all the policies and procedures that relate to the personal data they may handle in the course of their work.

Types of Information Collected

- 1) Individuals' names: we record the names and contact details of the individuals with whom we have contact for the purposes of soliciting research projects or supply contracts, recruiting employees, and raising finance. We also record at their own request contact details of those who seek to be notified by email of developments in our business.
- 2) Business name and contact details: we record the names, 'know your client' information and contact details of the institutions with which we seek research supply agreements.

Updating

We have a regular cycle of checking, updating or discarding old data on our staff, affiliates, consultants, shareholders, and research clients.

Lawful Basis for Processing Information (Underlying Principles)

The lawful basis for the personal data processed is one or more of the following, described in Article 6 (1) of the General Data Protection Regulation:

- 1) Consent: the individual has given clear consent for us to process their personal data for a specific purpose;
- 2) Contract: the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract;
- 3) Legal Obligation: the processing is necessary for us to comply with the law (not including contractual obligations);
- 4) Vital Interests: the processing is necessary to protect someone's life;
- 5) Public Task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law;
- 6) Legitimate Interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Data collected from our research clients is on the basis of (1) Research Contracts and (6) our Legitimate Interests. Data collected from visitors to our site, employees, shareholders or prospective shareholders is on the basis of (1) Consent or (6) our Legitimate Interests.

Withdrawing Consent

Once given, consent can be withdrawn, but not retrospectively. There may be occasions where Hiddensee has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn.

How Information is Collected and Stored

Web server information: we record the name, email address, postal address and telephone number of individuals filling in the form on the Contact page on our website. This information is stored on a dedicated web server.

Cookies: we use cookies on our website to improve the user experience. Users can opt out of receiving cookies.

Email: we collect and store emails on our computers and on our email server(s) in the United Kingdom. Information is not transferred outside the EEA.

Bulk Email provider: we use third-party providers, MailChimp, to deliver newsletters. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our products. For more information, please see MailChimp's privacy notices.

Hard drive and back-ups: we store information on the hard drives of our computers and back it up on non-connected storage, Microsoft and Google cloud-based systems.

Disclaimer

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means) you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Hiddensee does not control data collected or processed by self-employed Affiliates.

Phone

We do not record conversations.

Paper Copies

Information on compliance procedures, such as on-boarding and research handling is stored on hard drives as above and in physical form in files.

Disclosure and Use of Information

Commitment: Hiddensee is committed to ensuring that Data Subjects are aware that their data is being processed and

- for what purpose it is being processed,
- what types of disclosure are likely, and
- how to exercise their rights in relation to the data.

Right of Access

Right of access requests must be made by email to the Data Protection Officer, James Ridgewell, ridgewell@hiddensee.co.uk.

Your Rights in Relation to Your Information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by e-mailing Hiddensee to ridgewell@hiddensee.co.uk

- 1) to request access to your information and information related to our use and processing of your information;
- 2) to request the correction or deletion of your information;

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- 3) to request that we restrict our use of your information;
- 4) to receive information which you have provided to us in a structured, commonly used and machine-readable format (e.g. a CSV file) and the right to have that information transferred to another data controller
- 5) to object to the processing of your information for certain purposes; and
- 6) to withdraw your consent to our use of your information at any time where we rely on your consent to use or process that information.

Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, which is the Information Commissioner's Office (ICO), whose website is below.

Employee Training and Acceptance of Responsibilities

Induction: all employees of Hiddensee who have access to any kind of personal data will have their responsibilities outlined during their induction procedures.

Continuing Training: data protection issues will be covered during employee training, team meetings, supervisions, etc.

Further Information

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

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