



Taking Privacy Seriously

Participant Consent & Fair Processing Information Notice

Policy Reference: DOC22 v1.2
IS Classification: Trinity McQueen Business Confidential
Date: 09/05/2022
Owner: Joint Managing Director

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Identity and contact details

Trinity McQueen, acting as the data processor, is an established provider of market research services to UK and European clients. It is not involved in marketing services to directly promote products and services.

Information Commissioner's Office (ICO)

Trinity McQueen is registered with the ICO. The company's registration number is Z3622081.

Market Research Society (MRS)

Trinity McQueen is a company partner member with the Market Research Society (MRS) in the UK. The MRS is the market research industry's independent professional body, responsible for monitoring and maintaining standards in the UK and promoting best practice.

Data protection officer

Trinity McQueen's data processing officers are Robin Horsfield (also Joint Managing Director) and Rachael Walsh (also Purchasing & Compliance Manager). To contact either officer, please email: dataprotection@trinitymcqueen.com.

Purpose of processing data

Data handled and processed by Trinity McQueen will only be done so with the expressed commission and consent of its clients and participants (also known as subjects). Only classification, attitudinal and behavioural data will be collected from participants (consumers or the public, businesses, and organisations). Data is reported back to clients to help direct business or organisational strategy and product or service development.

Legal basis for processing data

Participant consent and agreement to take part in market research studies forms the legal basis for processing data under the EU General Data Protection Regulation (GDPR).

Informed consent

Before taking part in market research, Trinity McQueen always gains consent from individuals (or subjects) to collect and process their data. When consent is given, Trinity McQueen ensures this is freely given, specific (to the topic being researched), informed (so participants have information on which to choose or decline to take part), with an unambiguous, indication with clear affirmative action made by the participant. Consent is obtained for each separate processing activity. Separate consent is obtained for initial or preliminary market research or any re-contact or further data collection activity and processing.

Further obligations

Trinity McQueen is obligated to provide additional information to participants as set out in Section 17 of the MRS Code of Conduct. Prior to taking part in market research, all participants are informed of:

- i) The general topic of the data collection
- ii) Whether data collection will be recorded and / or observed
- iii) Who will have access to live or recorded information
- iv) Length in minutes of the data collection duration
- v) Any costs likely to be incurred by participants
- vi) Anonymised reporting of aggregated data to end clients

Categories of personal data collected

In conducting market research, Trinity McQueen will collect data such as demographic, financial, behavioural, and attitudinal etc. All participants will have given consent to provision of personal data prior to taking part. No participants will be coerced or pressured into providing personal data to Trinity McQueen. Information is given freely.

Use of video content

Where Trinity McQueen collects data using video recordings, for example, in ethnographic or qualitative studies, participants give prior consent for its use. This data is usually classified as PII (Personal Identifiable Information). Trinity McQueen secures consent from participants to broadcast video internally i.e., for Trinity McQueen's clients and for no other use or purpose and for its original purpose i.e., for market research.

Participants' or subjects' rights

Prior to participation, Trinity McQueen informs all individuals of their rights under the EU GDPR legislation 2018. These include the right to access, rectify, erase, restrict or object to processing of personal data.

Lodging complaints

Should participants wish to lodge a complaint with a supervisory body given the handling, collection and processing of data, Trinity McQueen provides the contact details and the process for making a formal complaint to the [MRS](#), [ICO](#) or directly to Trinity McQueen senior management.

Contacting Trinity McQueen

All participants are provided with the email address dataprotection@trinitymcqueen.com should they wish to contact Trinity McQueen, to withdraw previously given consent. This email address is checked daily by Trinity McQueen staff and actioned within 5 working days.

Processing of data outside of the EU

If personal data is to be transferred outside of the EU for processing purposes, participants are informed and asked for consent prior to project commencement.

Retention of PII data

Trinity McQueen retains PII for the duration of the market research project (typically 6-8 weeks). PII from all completed projects is deleted within 4 working weeks, unless otherwise dictated to by the end client. Anonymised or aggregated data (excluding PII) is retained for 2 years and archived after 3. Archived copies of anonymised client reports are kept on archive for 7 years.

Origins of personal data

Trinity McQueen collects this directly from participants in its studies for clients. If Trinity McQueen is using sample or lists provided by its clients, participants are informed of this source. Furthermore, participants are reassured that the end client has secured permission for the data to be used for market research purposes and that the sample or lists data may already contain pre-populated personal data.

Statutory data collection

Trinity McQueen does not collect personal data as part of statutory requirements eg national census data.

VERSION HISTORY

Version	Date	Author	Summary of changes	Review date
1.0.	23/03/2018	Robin Horsfield	Originated statement	29/03/2018
1.1.	5/04/2018	Rachael Walsh	Reviewed statement	11/04/2019
1.2	27/08/2019	Rachael Walsh	Reviewed & approved	27/08/2020
1.2	03/08/2020	Rachael Walsh	Reviewed & approved	03/08/2021
1.2	29/07/2021	Rachael Walsh	Reviewed & approved	29/07/2022
1.2	09/05/2022	Rachael Walsh	Reviewed & approved	09/05/2023

POLICY APPROVAL

Approved By: Robin Horsfield
Job Title: Joint Managing Director
Date: May 2022

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