

## Client Reporting Portal Privacy Policy

### PRIVACY STATEMENT

Your privacy is important to us and we take great care in protecting the information you provide whilst visiting our Client Reporting Portal. This policy explains how we collect, use, share and protect your Personal Data submitted through this Portal. By using this Portal you consent to our use of your Personal Data under this Privacy Policy.

This Privacy Policy does not apply to the collection and use of Personal Data in the market research projects that we conduct or our main website ([www.kokoro-global.com](http://www.kokoro-global.com)). In these cases, please refer to the Privacy Policy linked to each project or website.

### WHO WE ARE AND WHAT WE DO

Kokoro is a trading name of ABA Market Research Ltd. Kokoro is an independent award-winning insight agency which provides brands with insights that enable them to introduce better strategies and actions. Our principle business activities include customer research, customer experience and insight consultancy services.

### INFORMATION WE COLLECT

To use this Client Reporting Portal, you must be a registered user authorised by your company (which is either a Client, or a third-party service provider that has been authorised by the Client).

In the registration process, your company will provide us with certain information about you so we can setup a personal account for you on the Portal. Normally, this information includes your name, email address and your position within the Client's hierarchy.

We will also collect information about your activities on the Portal, including times and dates of usage, as well as information you provide when posting a message, such as recording feedback on any issues raised by research respondents.

The legal basis for processing your Personal Data is the legitimate interest of our client to ensure that you have access to the market research results through the Reporting Portal.

### HOW WE USE YOUR INFORMATION

We will only use your Personal Data for the reasons specified in this policy, unless you have specifically consented to, or opted in to, another use of your Personal Data.

The Personal Data we collect may be used for the following purposes:

- to provide the Client authorising your use of this Portal with information about your use of this service
- to share any messages, you have posted. These will be viewed by other users whom your company has authorised access
- to respond to requests you may make of us, including to provide services that you have requested
- to share with agents, contractors or partners of Kokoro in connection with services that these individuals or entities perform for, or with, our company. These agents, contractors or partners are restricted from using Personal Data in any way other than to provide services for us. We may, for example, provide Personal Data to agents, contractors or partners for hosting our databases, for data processing services, or to send you information that you requested; but those parties cannot use your Personal Data for their own purposes unrelated to the work they are doing for us
- to improve our Portal and identify any potential areas of improvement
- to respond to duly authorised information requests of governmental authorities or where required by law
- to investigate suspected fraudulent activity in connection with the Portal or violation of another party's rights
- in connection with the sale, assignment or other transfer of the business of this website (to which the information relates) - and in which case we will require any such buyer to agree to treat Personal Data in accordance with this Privacy Policy

### WHO WE SHARE THE INFORMATION WITH

All of your personal information is treated as confidential. We will never intentionally disclose this information to any third-parties unless you request or consent to sharing your identifying information with them for a specified purpose.

We will not sell your personal information to third-parties. Your information is not normally shared with anyone, except employees of Kokoro and trusted third-party processors to perform functions on our behalf, such as hosting our databases, providing IT support, managing our website and data processing services. They will have access to the information needed to perform their functions, but may not use it for other purposes. They will never use your information to send you marketing. They must also process the personal information as set out in this Privacy Policy and as permitted by applicable Data Protection legislation.

### HOW LONG WE KEEP YOUR INFORMATION

We will keep your Personal Data while you are a registered user of the Portal authorised by your company. Once your account is closed, your Personal Data will be deleted.

### COOKIES

We use cookies to ensure that we give you the best experience on our Portal and to improve the Portal's performance.

A cookie is a small text file that is downloaded on to your device (e.g. computer, mobile phone or tablet) when using a website. It allows the website to recognise your device and store some information about your preferences or past actions. They are widely used in order to provide visitors with a good experience when using the website, as well as to provide information to the owners of the site.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## SECURITY

The security of your personal information is very important to us. We have put in place reasonable physical, electronic and administrative procedures to safeguard the information we collect. All such information is held on secure servers; we have physical security of our offices and controlled access to our computer systems. Kokoro complies fully with all applicable Data Protection legislation.

Although our offices and servers are based within the United Kingdom, we (or one of our trusted third-parties acting on our behalf) may transfer your personal information outside the European Economic Area (EEA). Whilst some of these countries do not afford the same legal protection as is enjoyed in the EEA, we ensure that appropriate safeguards are in place to protect your information. These safeguards include the European Commission approved Model Contract Clauses, which ensure that transfers are legitimate. By providing us with your information, you consent to us (or third-parties acting on our behalf) transferring your information outside the EEA.

## YOUR RIGHTS

Your rights concerning your personal data are listed below. To exercise any of these rights, please submit your request to our Data Protection Officer (see the 'Contact Us' section below) and we will carry out any request to the extent required by applicable law.

- **The right of access** – you can ask to see the personal information we hold about you (along with certain other details) and we will show you free of charge (restrictions apply). We'll need you to verify who you say you are.
- **The right to rectification** – if the information we have about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your information with others, we'll let them know about the rectification where possible. If you ask us, we'll also tell you who we've shared your information with.
- **The right to erasure** – you can ask us to delete or remove your information in some circumstances, such as where we no longer need it or you withdraw your consent (where applicable). If we've shared your information with others, we'll let them know about the erasure where possible.
- **The right to restrict processing** – you can ask us to 'block' or suppress the processing of your information in certain circumstances, such as where you contest the accuracy of that information or object to us processing it. It won't stop us from storing your information but we'll tell you before we lift any restriction. If we've shared your information with others, we'll let them know about the restriction where possible.
- **The right to data portability** – you have the right, in certain circumstances, to obtain information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere.
- **The right to object** – you can ask us to stop processing your information if we are:
  - o relying on our own or someone else's legitimate interests to process your information;
  - o processing your information for direct marketing; or
  - o processing your information for research.
- **The right to withdraw consent** – if we rely on your consent (or explicit consent) as our legal basis for processing your information, you have the right to withdraw that consent at any time.
- **The right to complain** – if you have a concern about the way we've handled your personal information, you can report it to the UK regulator, Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling the helpline on 0303 123 1113.

## LINKS

For the convenience of users of this website, there may be links to third-party websites. Please be aware that any third party websites that you may link to from this website are out of the control of Kokoro and we are not responsible for their privacy practices or content. We suggest contacting those websites directly for information on their privacy policies.

## UPDATES

We reserve the right, at our discretion, to modify our privacy practices and update and make changes to this Privacy Policy at any time. If we make any changes, we will update our policy on this website.

## CONTACT DETAILS

If you have any queries concerning this policy please contact our Data Protection Officer either by email on [DPO@kokoro-global.com](mailto:DPO@kokoro-global.com) or by post at

Data Protection Officer  
Kokoro  
Hart House  
6 London Road  
St Albans  
AL1 1NG  
UK