

## Kokoro Privacy Policy

### PRIVACY STATEMENT

Your privacy is important to us and we take great care in protecting the information you provide whilst participating in one of our research projects (whether hosted on our own website, by a third-party website or by any other means, including by telephone, mobile app and in person). This policy explains how we collect, use, share and protect your personal information. By participating in one of our research projects you consent to our use of your data under this Privacy Policy.

### 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

The information we hold about research participants enables us to conduct our market research projects.

We will collect your personal information when you participate in one of our research projects. The legal basis for processing your data is consent and your co-operation in any ABA research project is voluntary at all times.

The information we collect will include your responses to the research project, which can contain your personal opinions as well as personal information, such as name, address, postcode, IP address, gender, age, date of birth, email address, telephone number, etc. We may also ask you to send in photos or videos of yourself. Occasionally we collect sensitive personal information such as ethnic origin, religious beliefs and political views.

If you are visiting one of our websites, we will also record which pages you visit, which type of browser you are using, your screen size and other basic metrics.

We never knowingly invite children under the age of 16 to participate in research projects without taking measures to ensure appropriate consent from a responsible adult.

### HOW WE USE YOUR INFORMATION

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

The personal information we collect may be used for the following purposes:

- To send you information about a research project you have agreed to participate in
- Combined with the responses of all others who participated in the same research project and used on an aggregated basis to determine which groups of people think certain things more than others
- Anonymised to remove your identifying information and then reported back to the client that commissioned the project
- Combined with further information the client (that commissioned the project) holds about you for research purposes (where you have given consent)
- To re-contact you for further information on your responses (where you have given consent)
- To invite you to participate in other research projects (where you have given consent)
- To administer and operate incentives and prize draws for participating in one of our research projects (where relevant)
- To re-contact you to validate your responses
- To respond to requests you may make of us
- To update and to ensure that our records of your personal information are correct (applicable only to panels)
- To manage and improve our website, apps and services
- To share with trusted third-party processors to perform functions on our behalf (please refer to the 'Who we share the information with' section for further details)
- To respond to duly authorised information requests of governmental authorities or where required by law
- To investigate suspected fraudulent activity in connection with our websites and services or violation of another party's rights
- In connection with the sale, assignment, or other transfer of the business to which the information relates, in which case we will require any such buyer to agree to treat personal information in accordance with this Privacy Policy

We do not use your personal data for any automated decision-making or profiling.

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it. If you would like to do this, please contact us.

### WHO WE SHARE THE INFORMATION WITH

All of your personal information is treated as confidential. We will never intentionally disclose this information to the client that commissioned the project or any other 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 ABA and trusted third-party processors to perform functions on our behalf, such as hosting our databases, providing IT support 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

Generally, we only keep your personal data for as long as we need, in order to use it for the reason(s) it was first collected. If you would like us to delete it sooner, please contact us.

In some circumstances we may keep your personal information for a period of five years after the research results are reported back to the client that commissioned the project.

## COOKIES

A cookie is a small text file that may be placed on your device (computer, mobile phone, tablet) when you complete one of our online surveys. Please refer to our [Cookie Policy](#) for further details.

## 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. ABA 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 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

Please be aware that any third-party websites you may visit or mobile apps that you may use during your participation in one of our research projects is out of the control of ABA and we are not responsible for their privacy practices or the content. We suggest contacting them directly for information on their privacy policies.

## UPDATES

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