

## **Privacy Statement**

Here at React CX, we value our relationships with our clients and shoppers highly. That is why we want to be completely transparent about why we need the personal information we request when you sign up with us, and how we will use it.

### **How we use your information...**

This privacy statement tells you what to expect when React CX collects your personal information. It applies to information we collect about:

- ❖ Visitors to our website
- ❖ Complaints and feedback received
- ❖ Information required for commercial purposes for providing our services to our customers – Mystery Shopping
- ❖ Mystery Shoppers
- ❖ Information for marketing of React CX
- ❖ Job applicants and our current and former employees

### **Visitors to our website**

When someone visits our website, we use a web collection service, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, the contact form, used by yourself with consent, will be our only means of collecting your personal information. In turn, this will not be shared with anyone outside of our organisation, unless this is part of the service you have given consent for. We will make it clear when we collect personal information and will explain what we intend to do with it.

### **Use of cookies by React CX**

You can read about how and why we use cookies on our Cookies Page.

### **Submission of your information**

Submission of your information, requested, from our website is held on our secure platform. This is protected by all methods necessary. Only the required personnel have access to this information. Your information will only be used for the stated intended purpose and will not be shared outside of React CX without your express consent. Your consent to share your information will be sought at the time of you submitting your data.

### **Complaints and feedback**

Should you wish to make a complaint our complaints process is available upon request. All information received during the course of a complaint is handled with the same level of security protection on need for privacy as any other information we collect.

### **Information required for commercial purposes for providing our services to our customers**

React CX use information provided by yourself to provide our services and products to our customers. This data is only used for its intended and stated purpose. This includes financial information for the production of invoices and receiving of payments for services provided.

## **Information on Mystery Shoppers**

We only access shopper information where it is provided voluntarily by the shopper, often to help us match them to suitable assignments. We treat all information we hold as highly confidential and private, as this information is not shared with our clients. We only have access to information that is necessary and where consent has been given. Shopper details are password protected, and only the shoppers can set these. Mystery Shoppers are able to log into and access their personal information whenever they want and can amend or delete this information if they wish.

## **Information on clients, organisations and projects**

We treat all information held about clients and client projects as highly confidential; this is supported by our data sharing agreements. Where data on client's colleagues is used in our reports, this is done so with the consent of our client's on behalf of their colleagues. We restrict the number of people who have access to client data to a bare minimum, and clients set their own passwords. The only details that are shared with our mystery shoppers are project briefs, questionnaires and locations for set assignments; this is only shared with the carefully selected shopper for each visit.

## **What information do we collect and how?**

Shoppers are asked to complete an extended shopper profile before they can sign up to complete any mystery shops. Within this profile, shoppers are asked to provide basic personal data, such as date of birth and gender, in order for our shoppers to be matched with appropriate assignments. Shoppers also provide bank details for payroll purposes, but these are password protected with passwords set by the shoppers. Contact details for the shoppers (phone and email) are also requested, with consent given to contact them via these means.

Clients provide us with contact emails, phone numbers, and information on their employees. They are instructed to ask permission from their colleagues and employees before sharing any of this information with us. Client information is requested and collected at the beginning of project phases and is regularly updated.

## **Protecting your information**

In order to protect your information, we have in place the following methods of protection: -

- ❖ Monitored Firewall protection
- ❖ Malware protection on all platforms
- ❖ Encryption on data at rest and at point of use
- ❖ Ongoing backups
- ❖ Auditing for data integrity on an ongoing basis

## **Information Backups**

React CX have a backup policy in place. We retain backups for a maximum of one year. Upon receiving a request to remove data of a personal nature, this will be completed by removing all reference and data from the production environment. The full deletion of this data will be achieved after the retention period stated above has been reached.

## **Requests for your information**

We will respond to requests for the information we hold on you within the required 30-day period. Initial requests will not be charged. However, should more than 2 requests be made within a 3-month period of time, subsequent requests will be charged at £10 per request.

All information will be provided in the format of a PDF document.

All requests for information will be carried out in accordance with our Subject Access Request Policy.

## Your rights

As an individual you have the following rights:

1. **The right to be informed** – the right to receive privacy information and information on how we process your personal data.
2. **The right of access** – the right to know that we are processing the personal data you have provided to us and, in most cases, the right to ask for a copy of the data we hold.
3. **The right to rectification** – the right to request that we correct inaccurate data or complete incomplete data that we hold for you.
4. **The right to erasure** – also known as the right to be forgotten. You have the right to request that we erase all data we hold for you.
5. **The right to restrict processing** – you have the right to restrict the way we process your data in certain circumstances, e.g. if you contest the accuracy of any data, if our processing is unlawful etc.
6. **The right to data portability** – you have the right to receive a copy of certain personal data or to have it transferred elsewhere in some circumstances.
7. **The right to object** – you have the right to object to us processing your data under certain circumstances.
8. **Rights in relation to automated decision making and profiling** – automated decision making will not be used unless absolutely necessary.

## Marketing Information

React CX collect information from various sources for marketing purposes. This information can be from social media forums, industry forums to name but a few. We retain this information for a period of no more than 18 months, or the duration of the marketing campaign only.

## Sharing information

React CX share information with the following external organisations for commercial purposes: -

- ❖ Lodge Security
- ❖ SASSIE
- ❖ IT Support Provider
- ❖ HMRC
- ❖ Pension Provider

Where contractually necessary, only specific relevant pre-agreed data will be shared with:

- ❖ Client
- ❖ Third Party Mystery Shopping Providers

## ❖ Mystery Shoppers

Information is shared with organisations **in the UK-EU only**.

The exception to this criteria is the sharing of information with UK authorities for investigatory purposes as per current legislation on finance and personnel.

### **Supplier Information**

React CX are aware that sometimes information with regards to suppliers is personal in nature. This information is protected to the full extent as any other information within our environment. This information is not shared unless express permission is granted by the individual.

Shoppers are considered suppliers; as all data on shoppers is managed through SASSIE it is the shopper's responsibility to ensure that their personal data is kept up to date. Similarly, should the shopper wish to be deleted or forgotten they have the ability to delete their own profile from SASSIE; however, any contractual information within already published work will be retained for commercial purposes. React CX do not have the permissions to delete all personal data of the shopper, it is the responsibility of the shopper to delete themselves from SASSIE should they wish to do so.

### **Job applicants and our current and former employees**

#### **Job applicants**

When React CX receive job applications we hold these in a secure manner. The application forms are deleted or, in the instance of hard copies, shredded after the selection period is completed. This information is not shared outside our organisation and is only shared internally with designated personnel. Where information of an applicant is to be retained for future use only the contact information will be retained. Consent from the applicant will be sought prior to the retention of any personal contact information.

#### **Current employees**

All personal information held by React CX on current employees is managed and maintained in a secure manner, the same as any other information we hold. All employees have the right to view the data we hold on them at any time. A formal request is required to be made for this information through their line manager.

#### **Former employees**

All personal information held by React CX on former employees is managed and maintained in a secure manner, the same as any other information we hold. Should a former employee wish to view the data that we hold on them the steps for requesting information (detailed above) is followed. Information held on personnel is retained for a period no longer than 3 years after the cessation of employment, in line with current UK legislation. After this period of time all information on the former employee is deleted. If requested, a confirmation of this will be communicated to the person.

### **Reporting of Data Breaches**

React CX report all major data breaches, of data we have control and are responsible for, to the Information Commissioners Office, our customers and/or suppliers. All potential data breaches are fully investigated as per our Information Security Incident Policy.

When a data breach is detected, and the severity ascertained, this will be reported to the ICO within 72 hours.

### **Security and Protection**

React CX take security of all information seriously, we hold certification to the following schemes: -

ISO9001:2015 Quality Management System Standard

ISO27001:2013 Information Security Management System Standard

As such, our management system is audited and verified on an annual basis

### **Changes to the Privacy Statement**

We may update this policy to reflect changes in how we use this information. When the policy is updated, you will be asked to agree to it again to ensure full transparency.

### **Data Protection Officer**

React CX have designated the Managing Director (Nicky Barrell) as their Data Protection Officer (DPO). If you have any questions about this privacy policy and how we use your information, or to make a subject access request, you can contact us at:

#### **React CX**

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