

## Privacy Policy

### 1. Purpose of this Policy

This privacy policy ("Privacy Policy") explains our approach to any personal information that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. This Privacy Policy also sets out your rights in respect of our processing of your personal information. For more information click [here](#).

This Privacy Policy will inform you of the nature of the personal information about you that is processed by us and how you can request that we delete, update, transfer it and/or provide you with access to it.

Please also note that this Privacy Policy only applies to the use of your personal information obtained by us, it does not apply to your personal information collected during your communications with third parties.

### 2. Who are we and what do we do?

We are The Liminal Space, ("we", "us" or "our").

The Liminal Space is an English company with registered company number: 08024470, whose registered office is at 81 Dartmouth Park Road, London, NW5 1SL UK

### 3. How to contact us?

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by sending an e-mail to Diana Ursu at [diana@the-liminal-space.com](mailto:diana@the-liminal-space.com)

### 4. What personal information do we collect and how do we use it?

We help organisations with public engagement – as part of this role we sometimes conduct surveys and interviews on behalf of our clients or to assess the impact of our work. For the most part, the data we collect is anonymous ie, we do not collect or hold any personal information that can identify individuals as the survey is distributed either by the client themselves or a third party such as a market research agency.

Where we use a third party to conduct the fieldwork on our behalf, we ensure that they meet the requirements set out in the GDPR guidelines. All of the third parties we sub-contract to, are run from the UK and all of their data storage is in the UK.

On occasion we do run quantitative or qualitative research studies using beneficiary, customer or employee data provided by our clients. In these instances we are not the data controller of this information – we are only the data processor conducting a specific research study on behalf of a client. Our primary goal in using this personal information is to ensure we are recruiting the right respondents for the research study. We do not retain this data once we have completed the research study (all personal data is destroyed within 2 months of fieldwork completion); the results are anonymised at the analysis stage unless respondents give their permission to let us use their personal details when reporting back to clients eg. images in a research report; we will not use the personal information for marketing purposes.

In every piece of research we conduct we write a research plan which outlines how the research is going to be conducted, how we will achieve consent, how the analysis and reporting will be achieved and how all personal data will be destroyed.

## 5. How do we obtain your consent?

Where our use of your personal information requires your consent, you can provide such consent at the time we collect your personal information following the instructions provided.

Please note that we do not collect personal information (anonymous or not) on our website.

## 6. How to access your information and your other rights?

You have the following rights in relation to the personal information we hold about you:

- Your right of access.

If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

- Your right to rectification.

If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to erasure.

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to restrict processing.

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us processing it. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to data portability.

With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

- Your right to object.

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal information for direct marketing.

- Your rights in relation to automated decision-making and profiling.

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

- Your right to withdraw consent.

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

- Your right to lodge a complaint with the supervisory authority.

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK 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 their helpline on 0303 123 1113.

## **7. We may also use your personal information for the following purposes:**

### **A. CLIENT SERVICE ENQUIRIES.**

Contact information is collected from potential clients, together with details of other personal information that is relevant to an enquiry. This information is used in order to enable us to respond to your requests.

- Who do we share your personal information with for this purpose?

We do not share your personal information for this purpose.

- What is our legal basis?

It is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best customer service we can to you.

### **B. YOUR FEEDBACK ABOUT OUR SERVICES.**

From time to time we may contact you to invite you to provide feedback about our services. We use this information to help us improve the quality of service provided. We also use your feedback to monitor the quality of our services.

- Who do we share your personal information with for these purposes?

We do not share your personal information for this purpose.

- What is our legal basis?

It is in our legitimate business interests to use the information you provide to us in your feedback for the purposes described above.

### **C. USER INSIGHT AND ANALYSIS.**

We may analyse your contact details with our communications to you.

We may use this information for marketing purposes (see the marketing section below for further details).

- Who do we share your personal information with for these purposes?

We do not share your personal information for this purpose.

- What is our legal basis?

It is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best products and services to you.

#### D. MARKETING COMMUNICATIONS.

We may carry out the following marketing activities using your personal information:

##### POSTAL MARKETING.

We may use information that we collect about your needs and on occasion send you marketing communications by post where you have consented to receive postal marketing communications.

- Who do we share your personal information with for these purposes?

We may share your personal information with a variety of third party postal providers who assist us in delivering our postal marketing campaigns to you, including the Post Office.

- What is our legal basis?

Where your personal information is not in an anonymous form, such as your postal address, it is in our legitimate interest to use your personal information for postal marketing.

##### EMAIL MARKETING.

We may send you marketing communications by email, where you have consented to receive such marketing communications, or where we have another lawful basis to do so.

- Who do we share your personal information with for these purposes?

We may share your personal information with a variety of third party email marketing providers who assist us in delivering our email marketing campaigns to you.

- What is our legal basis?

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information for marketing purposes.

We will only send you marketing communications via email where you have consented to receive such marketing communications, or where we have a lawful right to do so.

##### BUSINESS ADMINISTRATION AND LEGAL COMPLIANCE.

We use your personal information for the following business administration and legal compliance purposes:

- to comply with our legal obligations;
- to enforce our legal rights;
- protect rights of third parties; and

- in connection with a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.

- Who do we share your personal information with for these purposes?

We will share your personal information with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities.

- What is our legal basis?

Where we use your personal information in connection with a business transition, enforce our legal rights, or to protect the rights of third parties it is in our legitimate interest to do so. For all other purposes described in this section, it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us such as a court order.

Where we share your sensitive personal information, we shall obtain your consent to do so.

Any other purposes for which we wish to use your personal information that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you.

## **8. Third Party Links and Services**

Our Site contains links to third party websites and services. Please remember that when you use a link to go from our Sites to another website or you request a service from a third party, this Privacy Policy no longer applies.

Your browsing and interaction on any other websites, or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies.

We do not monitor, control, or endorse the privacy practices of any third parties.

We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices.

This Privacy Policy applies solely to personal information collected by us through our Service and does not apply to these third party websites and third party service providers.

## **9. How long do we keep your personal information for?**

Regarding personal information we have processed as part of providing the Services to any client, we will retain relevant personal information for at least two months from the date of our last interaction with that person and in compliance with our obligations under the EU General Data Protection Regulation (or similar legislation around the world).

Client information will be kept for at least 12 months from the date of our last interaction with that client and in compliance with our obligations under the EU General Data Protection Regulation (or similar legislation around the world).

We do not currently collect personal information on our website.

## **10. Confidentiality and security of your personal information**

We are committed to keeping the personal information you provide to us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

Our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of our Services and all respondents taking part in our services.)

## **11. Changes to this Privacy Policy**

We may make changes to this Privacy Policy from time to time.

To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We will notify you by e-mail of any significant changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.