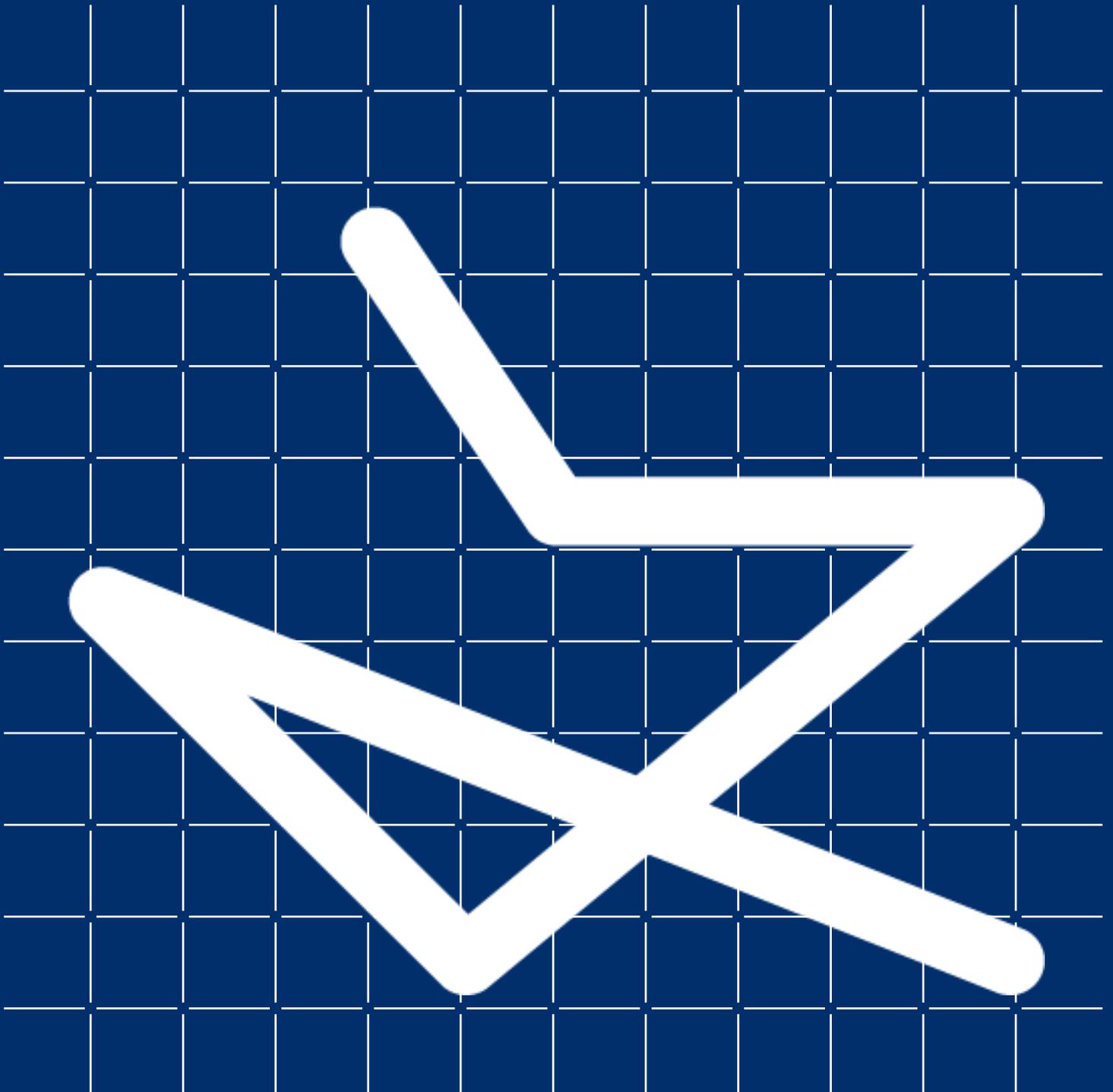


Research First Privacy Policy

April 2019



Research First Privacy Policy

Research First is dedicated to protecting the confidentiality and privacy of information entrusted to us. We comply with the Privacy Act 1993.

Please read this Privacy Policy to learn about your rights, what information we collect, and how we use and protect it.

This website is operated by Research First Limited (“we” or “us”), a New Zealand limited liability company.

1. Who are we?

This Privacy Policy applies to Research First Limited, a research and business consultancy based in Christchurch, New Zealand.

2. Who can you contact for privacy questions or concerns?

If you have questions or comments about this Privacy Policy or how we handle personal data, please direct your correspondence to:

Research First, Data Protection and Privacy Officer
PO Box 94
Christchurch

or alternatively email privacy@researchfirst.co.nz. We aim to respond within 14 days from the date we receive privacy-related communications.

You may contact the New Zealand Privacy Commissioner’s Office at <https://www.privacy.org.nz/> to report concerns you may have about our data handling practices.

3. How do we collect personal data?

- **Directly.** We obtain personal data directly from individuals in a variety of ways, including obtaining personal data from individuals who complete surveys administered by Research First, provide us their business card, complete our online forms, subscribe to our newsletters, register for webinars, attend meetings or events we host, visit our offices or apply for open roles. We may also obtain personal data directly when, for example, we are establishing a business relationship, performing professional services through a contract, or through our hosted software applications.
- **Indirectly.** We obtain personal data indirectly about individuals from a variety of sources, including recruitment services and our clients. We may attach personal data to our customer relationship management records to better understand and serve our business clients, subscribers and individuals, satisfy a legal obligation, or pursue our legitimate interests.
 - *Public sources* -- Personal data may be obtained from public registers (such as NZ Companies Office), news articles, sanctions lists, and Internet searches.
 - *Social and professional networking sites* -- If you register or login to our websites using social media (e.g., LinkedIn, Google, or Twitter) to authenticate your identity and connect your social media login information with us, we will collect information or content needed for the registration or login that you permitted your social media provider to share with us. That information may include your name and email address and depending on your privacy settings, additional details about you, so please review the privacy controls on the applicable service to set how much information you want shared with us.
 - *Business clients* -- Our business clients may engage us to perform professional services which involves sharing personal data they control as part of that engagement. For example, we will review customer data

as part of an experience survey. Our services may also include processing personal data under our clients' control on our hosted software applications, which may be governed by different privacy terms and policies.

- *Recruitment services.* We may obtain personal data about candidates from an employment agency, and other parties including former employers, and credit reference agencies.

4. What categories of personal data do we collect?

We may obtain the following categories of personal data about individuals through direct interactions with us, or from information provided through client engagements, from applicants, our suppliers and through other situations including those described in this Privacy Policy.

- Personal data. Here is a list of personal data we commonly collect to conduct our business activities.
 - Contact details (e.g., name, company name, job title, work and mobile telephone numbers, work and personal email and postal address).
 - Professional details (e.g., job and career history, educational background and professional memberships, published articles).
 - Financial information (e.g., household income levels for demographic analysis).
 - Video recordings of focus groups and in-depth interviews
 - CCTV at our sites may collect images of visitors. Our policy is to automatically overwrite CCTV footage within 30 days.
- Sensitive personal data. We typically do not collect sensitive or special categories of personal data about individuals. When we do need to process sensitive personal data, it is with the consent of the individual unless it is obtained indirectly for legitimate purposes. Examples of sensitive personal data we may obtain include:
 - Dietary restrictions or access requirements when registering for in-person events that reveal religious beliefs or physical health.
 - Personal identification documents that may reveal race or ethnic origin, and possibly biometric data of private individuals, beneficial owners of corporate entities, or applicants.
 - Information provided to us by our clients in the course of a professional engagement.
- Child data. In our general work we do not intentionally collect information from individuals under 16 years of age. There may be occasions that we are asked by clients to survey children (aged 15 years and younger) and when this happens we comply with ESOMAR's Guidelines for surveying young people and always with prior parental consent.
- Location-based data. We may process geographical locations you give us to analyse location specific responses that include the attitudes, perspectives and behaviours of sub communities.

5. What lawful reasons do we have for processing personal data?

We may rely on the following lawful reasons when we collect and use personal data to operate our business and provide our products and services:

- Contract – We may process personal data in order to perform our contractual obligations.
- Consent - We may rely on your freely given consent at the time you provided your personal data to us.
- Legitimate interests – We may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced. These include:
 - *Delivering services to our clients* – To deliver the professional services our clients have engaged us to provide.
 - *Direct marketing* – To deliver timely market insights and speciality knowledge we believe is welcomed by our business clients, subscribers and individuals who have interacted with us.

6. Why do we need personal data?

We aspire to be transparent when we collect and use personal data and tell you why we need it, which typically includes:

- Providing professional advice and delivering reports related to our market research and insights consultancy practice.
- Helping our clients navigate complex business problems and decisions by using evidence based aggregated data and responses.

7. What are your data protection rights?

Your data protection rights are highlighted here:

- Access – You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- Correction – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- Erasure – You can ask us to erase (delete) your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.
- Processing restrictions – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.
- Data portability – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if it is technically feasible.
- Right to Object to Direct Marketing including Profiling – Information gathered in our survey process is not used for direct marketing. Information sourced for business to business purposes including sales may be used where we believe there will be interest from the receiving party. You can

object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with your request to cease marketing to you.

- **Right to Withdraw Consent** – You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

8. What about personal data security?

We have put appropriate technical and organisational security policies and procedures in place to protect personal data (including sensitive personal data) from loss, misuse, alteration or destruction. We aim to ensure that access to your personal data is limited only to those who need to access it. Those individuals who have access to the data are required to maintain the confidentiality of such information. We may apply pseudonymisation, de-identification and anonymisation techniques in efforts to further protect personal data.

If you have access to parts of our websites or use our services, you remain responsible for keeping your user ID and password confidential. Please be aware that the transmission of data via the Internet is not completely secure. Whilst we do our best to try to protect the security of your personal data, we cannot ensure or guarantee the security of your data transmitted to our site; any transmission is at your own risk.

9. How long do we retain personal data?

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations and professional obligations that we are subject to. Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual requirements, where we retain personal data in accordance with these uses, we retain personal data for seven years. We will dispose of personal data in a secure manner when we no longer need it.

10. Do we link to other websites?

Our websites may contain links to other sites that are not governed by this Privacy Policy. Please review the destination websites' privacy policies before submitting personal data on those sites. Whilst we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites.

11. Do we change this privacy policy?

We regularly review this Privacy Policy and will post any updates to it on this webpage. This Privacy Policy was last updated 2 February 2019.