

## Privacy Policy

### 1. [Important information and who we are](#)

#### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Walnut Unlimited collects and processes your personal data through your participation in our research projects.

It is important that you read this privacy notice together with the Walnut privacy notice (found [here](#)) and any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### **Controller**

Volkswagen Financial Services (VWFS) is the controller and responsible for your personal data. You can access their own Privacy Policy at <https://customer.vwfs.co.uk/privacy-policy.html>

Walnut Unlimited is the data processor for the purposes of running the Sparking Debate panel.

Walnut have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details below.

#### **Contact details**

Our full details are:

Walnut Unlimited Limited  
Data Protection Officer

Email address:

[WAL\\_dpo@walnutunlimited.com](mailto:WAL_dpo@walnutunlimited.com)

Postal address:

Winchester: St Swithun's House, 1a St. Cross Rd, Winchester, Hampshire, SO23 9JA

London: 7-11 Lexington Street, London W1F 9AF

Telephone numbers:

London: +44(0)207 349 4000

Winchester: +44(0)1962 842211

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would,

however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Additional Processor**

Platform One is a Processor of the data referred to in this Privacy Policy. Platform One hosts the platform on which the Sparking Debate panel sits. When panellists log into the panel, complete surveys or participate in discussions on the panel, they engage with the Platform One's platform.

#### 2. [The data we collect about you](#)

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include information from which a person cannot be identified (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the panel.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use the panel.
- **Audio Visual Data** includes your recordings, be that audio, visual, or both, collected as part of a research study

We also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing the panel. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

#### 3. [How is your personal data collected?](#)

- *[Applicable only to those who were recruited via VW FS sample]* **Interactions with VWFS.** As a VWFS customer, your Identity and Contact Data have been provided to us by VWFS in line with their own Privacy Policy, in order to allow us to invite you to register as a panellist.

- **Direct interactions with Walnut.** You may give us your Identity and Contact data by filling in forms, participating in a survey, or corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Register as a panellist
  - Participate in a survey; or
  - Give us feedback
  
- **Automated technologies or interactions.** If interacting with the Walnut website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

We use the following cookies:

- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Our platform provider, Platform One, uses the following cookies;

- **ASPXANONYMOUS.** Used by sites that use .NET. It enables the site to track unique users who are not logged in.
- **.DOTNETNUKE.** Necessary for site functionality. It is created when a user logs in. It can be configured using Forms Authentication.
- **\_\_RequestVerificationToken.** Anti-forgery cookie issued by web applications that are built using the ASP.NET MVC technologies. It is designed to stop the unauthorized posting of content to a website (known as Cross-Site Request Forgery). It contains no information about the user and is deleted when the browser is closed.
- **Authentication.** Used for forms authentication. Created when a user logs in.
- **dnn\_IsMobile.** Used to determine whether the visitor is using a Mobile Device.
- **Langue.** Stores the current portal language. In a monolingual portal, it contains the browser's default language.
- **LastPageId.** Stores the TabID of the last visited page.
- **StayInEditMode.** Determines the UI state across postbacks (i.e., it determines whether or not to reload the page with the Editing interface).
- **Analytics.** Used by the Content Personalization feature.
- **Analytics\_VisitorId.** They are used to identify the user of the session and to use this data for navigation through the personalization of content.
- **ASP.NET\_SessionId.** Retains user settings configuration across page requests.

#### 4. [How we use your personal data](#)

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Consent
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation

See below to find out more about the types of lawful basis that we will rely on to process your personal data.

#### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Participating in a survey or other research study	(a) Identity (b) Contact (c) Opinions (d) (e) Images (f) Audio	Consent
Contacting you on behalf of a third party to participate in a research study	(a) Identity (b) Contact (c) opinions (d) profile	Consent Legitimate interest
Contacting you to ensure the quality and validity of our research by checking that we record an accurate account of your views	(a) Contact	Legitimate interest
To register you as a new panel member	(a) Identity (b) Contact (c) Profile	Performance of a contract with you
To manage our relationship with you which will include:	(a) Identity (b) Contact (c) Profile	Performance of a contract with you. Necessary to comply with a legal obligation
(a) Notifying you about	(d) Marketing and	Necessary for our legitimate interests

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Processing incentives	Communications	(to keep our records updated and to capture customer feedback and opinions)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about other survey opportunities that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
Participation in advanced surveying methods	(a) Identity (b) Contact (c) Opinions (d) Special category data (e) Images (f) Audio	Consent

### Other survey opportunities from third-parties

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

### Opting out

We provide the opportunity to withdraw your participation from any surveys you are invited to take part in.

### COOKIES

When you visit our website you will be given the option to consent to non-essential cookies using a cookie banner. Some cookies are essential to allow full access to the website and in order for it to function properly. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

#### 5. [Disclosures of your personal data](#)

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### 6. [International transfers](#)

The majority of external data storage used by Walnut Unlimited is located within the UK and EU, where possible we ensure UK or EU data centres are used. We use Office 365 and Forsta servers located within the EEA. To the extent we transfer data outside of the EEA we will ensure that the appropriate safeguards are in place e.g. where personal data is transferred to third parties in the United States, we implement an international data transfer agreement following a risk assessment.

#### 7. [Data security](#)

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business requirement to access it. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### 8. [Data retention](#)

**How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we

collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

A back-up of data is kept on Platform One servers for 1 year. Upon hard deletion of a panellist, all personally identifiable information will be scrambled and cannot be reversed.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. [Your legal rights](#)

Under certain circumstances, you have rights under data protection laws in relation to your personal data. See below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. [Glossary](#)

### **LAWFUL BASIS**

**Legitimate Interest** means using your data in ways you would reasonably expect where it is necessary for us to use your data without giving you full control upfront.

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

#### **Internal Third Parties**

Other companies in the Unlimited Group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

#### **External Third Parties**

- Platform One - the platform host
  1. Other third parties providing tools and services, such as agency insight tools and CRM services.
    - Service providers acting as processors based in EEA who provide IT and system administration services.

### **YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request").

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data's accuracy;
- (b) where our use of the data is unlawful but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.