

Data Protection Policy

Policy information	
Organisation	<p>The Data Controller is Entext Communications Limited, a limited company registered in England and Wales (registration number 04949122) the registered office of which is at 20-22 Wenlock Rd London N1. You can contact the data controller by writing to Entext Economics Ltd, 20-22 Wenlock Rd London N1 7GU or sending an email to info@entext.com.</p> <p>Messels have no Data Processors, in relation to personal data, i.e. any person (other than an employee of the data controller) who processes the data on behalf of the data controller.</p>
Policy operational date	01/05/2018
Policy prepared by	Sean Maher, Director

Introduction	
Purpose of policy	<p>This Privacy Policy sets out how we, Messels Limited, collect, store and use information about you when you use our website, https://messels.com and where we otherwise obtain or collect information about you.</p> <p>The reasons for the policy are to comply with the law, follow good practice, to protect clients, staff and other individuals and to protect the company.</p>
Types of data	We collect individual information from our company staff and individual and company information from our Appointed Representatives and consumers of our research.
Policy statement	<p>This Data Protection Policy complies with both the law and good practice and respects individuals' rights. The company will be open and honest with individuals whose data is held and provide training and support for staff who handle personal data, so that they can act confidently and consistently.</p> <p>In the event of data breaches the Supervisory Authority (the ICO) will be notified within 72 hours. In addition, for major breaches the data subjects will be notified without delay. A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.</p>

Responsibilities	
The Board / Company Directors	The Board has overall responsibility for ensuring that the organisation complies with its legal obligations.
Data Protection Officer	<p>The Data Protection Officer is Tim Parker, CEO, Messels. His responsibilities include:</p> <ul style="list-style-type: none"> • Briefing the Board on Data Protection responsibilities • Reviewing Data Protection and related policies • Advising other staff on Data Protection issues • Ensuring that Data Protection induction and training takes place • Notification to the ICO if required • Handling subject access requests • Approving unusual or controversial disclosures of personal data • Approving contracts with Data Processors

Employees	All staff should read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.
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Types of information collected (from research clients)	
Individuals' names	We record the names and contact details of the individuals within institutions with whom we have research supply agreements.
Business name and contact details	We record the names, 'know your client' information and contact details of the institutions with which we have research supply agreements.
Updating	We have a regular cycle of checking, updating or discarding old data on our staff, research clients and Appointed Representatives.

Lawful basis for processing information	
Underlying principles	<p>The lawful basis for the personal data processed is one or more of the following, described in Article 6 (1) of the General Data Protection Regulation:</p> <p>(a) Consent: the individual has given clear consent for us to process their personal data for a specific purpose.</p> <p>(b) Contract: the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.</p> <p>(c) Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).</p> <p>(d) Vital interests: the processing is necessary to protect someone's life.</p> <p>(e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.</p> <p>(f) Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.)</p> <p>Data collected from our research clients is on the basis of (b) Research contracts and (f) Our legitimate interests.</p>
Withdrawing consent	Once given, consent can be withdrawn, but not retrospectively. There may be occasions where Entext has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn.

How information is collected and stored	
Web server information	We record the name, email address, postal address and telephone number of individuals filling in the form on the Contact page on the website. This information is not transferred outside the EEA and is stored on our own web server in the United Kingdom.
Cookies	We do not use cookies on our website.

Email	We collect and store emails on three personal computers and on our email server in the United Kingdom. Information is not transferred outside the EEA.
Bulk Email provider	We use a third-party provider, Constant Contact, to deliver some of our research products. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our products. For more information, please see Constant Contact's privacy notice.
Hard drive and back ups	We store information on the hard drives of office computers and back it up on Dropbox <i>cloud services</i> .
Disclaimer	<p>Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means) you do so entirely at your own risk.</p> <p>We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.</p>
Phone	We log all telephone calls with research clients for monitoring purposes but do not record conversations.
Paper copies	Information from compliance procedures, such as on-boarding, research handling and quarterly compliance meetings, is stored on hard copy files and kept in secure storage.

Disclosure and use of information (from research clients)	
Commitment	<p>Entext is committed to ensuring that Data Subjects are aware that their data is being processed and</p> <ul style="list-style-type: none"> • for what purpose it is being processed • what types of disclosure are likely, and • how to exercise their rights in relation to the data
Right of access	Right of access requests must be in writing or by email to the Data Protection Officer, Dung Vu at dung.vu@entext.com.

Employee training & acceptance of responsibilities	
Induction	All employees of Entext who have access to any kind of personal data will have their responsibilities outlined during their induction procedures.
Continuing training	Data Protection issues will be covered during employee training, team meetings, supervisions, etc.

Further information	
For more information	https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/