

# Online privacy policy

**Updated 1 July 2020**

## **How we look after personal data that we collect from you or that you provide to us**

Oxford Policy Management Limited (“OPM”, “we”, “us”, “our”) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data that we collect from you when you use our online channels (regardless of where you visit them from) and to tell you about your privacy rights and how the law protects you. You may interact with OPM in other ways, for instance, you are a member or staff or have enrolled to participate in an OPM event in which case there may be a separate privacy policy which describes how we use that data.

We keep our privacy policy under regular review. This version of our privacy policy was last updated on 1 July 2020. Historic versions of the policy can be obtained by emailing us at [dataprotection@opml.co.uk](mailto:dataprotection@opml.co.uk).

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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## 1) Important information and who we are

### Purpose of this privacy notice.

This privacy policy aims to give you information on how OPM collects and processes your personal data through your use of its online channels including as part of your work with us, or when you apply to work with OPM, or when you subscribe to our newsletters, publications or communications; or participate in our surveys.

OPM's website ([www.opml.co.uk](http://www.opml.co.uk)) website is not intended for children, and we do not knowingly collect data relating to children through this website. It is important that you read this privacy policy together with any other privacy policies or fair processing notices 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 policy supplements other privacy policies and notices and is not intended to override them.

### Controller

Oxford Policy Management Limited is a private limited company registered in England and Wales with company number 3122495. We have subsidiaries both in the United Kingdom and other parts of the world, details of which can be found [here](#). This privacy policy applies to all OPM entities and references to "OPM", "we", "us" or "our, apply accordingly.

This privacy policy relates to information which is obtained by OPM and for which OPM is the Data Controller.

To contact OPM in regard to this privacy policy or any aspect of its implementation, to make a complaint, to request access to your personal information, or to request correction of your personal information or any other rights associated with your personal information: please contact us using the details set out below:

### Contact details

#### By post:

Head of Compliance and Risk  
Oxford Policy Management Limited  
Level 3, Clarendon House  
52 Cornmarket Street  
Oxford  
OX1 3HJ  
United Kingdom

**By email:** [dataprotection@opml.co.uk](mailto:dataprotection@opml.co.uk)

**By telephone:** +44 (0) 1865 2017 300 ext 2757

### Complaints

You have the right to make a complaint at any time to your data protection supervisory authority. In the UK, this is the Information Commissioner's Office or ICO ([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 or other supervisory authority, so please contact us in the first instance.

### Changes to your personal data

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, so that we can update our records.

### **Third-party links**

OPM's website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **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 data where the identity has been removed (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 (usually email address), marital status, title, date of birth and gender, job title and place of work, nationality;
- **Contact Data** includes personal address, email address and telephone numbers, business contact details, emergency contact details (where you apply to work with us);
- **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 this website;
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website;
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences;
- **Biographical Data** any information you might provide to us in your application, curriculum vitae or in your interview and more generally, as part of the recruitment process, for example, test results, health questionnaires, proof of identity and professional qualifications and information that we may collect from you or from background check providers or referees;

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. 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 a specific website feature. 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.

We do not collect any **Special Categories of Personal Data** (or “Sensitive” Personal Data) about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data and criminal convictions and offences) unless;

- you have applied to work with us; or
- have provided that information as part of a survey.

Special Categories of Personal Data will be processed in accordance with applicable law, this privacy policy, and any other privacy notice we give to you when you communicate with us.

We only collect personal data relevant to the type of transactions or interaction you have with OPM.

Whatever your interaction with us, this information will be minimal and linked to the purpose for which we need it.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you but we will notify you if this is the case at the time.

In particular if you fail to provide information when requested which is necessary for us to consider your application for employment with OPM we may not be able to take your application further.

### **3) How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - subscribe to our newsletters, publications or communications;
  - request marketing, event or other information to be sent to you;
  - apply to work with us;
  - complete a survey; or,
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Analytics providers and search information providers, such as Google based outside the European Union (“EU”);

- Publicly available sources such as the UK Companies House or equivalent in other countries that we do business in;
- Recruitment agents;
- Background screening providers based inside and outside the EU including Horus Limited, the Disclosure and Barring Service in respect of criminal convictions or its equivalent in other jurisdictions;
- Named referees in connection with a job application;
- Background check providers in connection with an application to work with us as a consultant or employee including due diligence checks;
- Providers of psychometric testing in connection with a job application

**When you use OPM's online channels, including social media, streaming services, and newsletters.** We might also obtain personal data through your use of social media, streaming services depending on your settings or the privacy policies of these services. Email newsletter services we use may also collect personal data. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this. **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:

- 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 comply with a legal or regulatory obligation.
- Where we need to perform any contract we are about to enter into or have entered into with you.
- Where we have your consent. Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

You have the right to withdraw consent to marketing at any time by [contacting us](#).

#### **4) 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 use your personal data, and which of the legal basis 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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To manage our relationship with you which may include notifying	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal

you about changes to our terms or privacy policy.	(c) Profile (d) Marketing and Communications	obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how the public understand our services, to develop them, to grow our business and to inform our strategy)
To provide newsletters and other project related information and marketing and to share with our client for the same purpose.	(a) Contact (b) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for our marketing purposes and in order to develop our products, services and grow our business) (c) Consent
To improve our website, services, marketing, and relationships	(a) Technical (b) Usage (c) Behavioural	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our strategy)
As part of our recruitment process which includes assessing your suitability for a role, carrying out background and reference checks, keeping records etc.	(a) Identity (b) Contact (c) Biographical (d) Behavioural	(a) Necessary for our legitimate interests (to grow our business and to inform our structure) (b) Performance of a contract with you (c) complying with our legal/regulatory obligations
To provide services to clients, to gain additional work and to provide you with further opportunities if you are working with us.	(a) Identity (b) Contact (c) Biographical	(a) Necessary for our legitimate interests (to grow our business and to inform our structure). (b) Performance of a contract with you.
For security purposes	(a) Identity (b) Contact (c) Financial (d) Usage (e) Technical	(a) Necessary for our legitimate interests (for security purposes and to protect our business) (b) Necessary to comply with a legal obligation

To enable you to complete a survey	(a) Identity (b) Contact (c) Biographical (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to grow our business, as part of projects that we are involved in and to inform our strategy)
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## How we use Special Categories of Personal Data in Recruitment

We will use sensitive personal information (Special Categories of Personal Data) where you apply to work with us in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment and selection process;
- We will use information about your race or national or ethnic origin, religious, sexual orientation to ensure meaningful equal opportunity monitoring and reporting; and
- Depending on the role you are applying for, we will collect and process information about criminal convictions.

The lawful basis on which we process special category data is set out in our Recruitment Policy.

## Automated Decision-Making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. You can exercise your right to unsubscribe from marketing material at any time by contacting us at [dataprotection@opml.co.uk](mailto:dataprotection@opml.co.uk).

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any other transaction which we will continue to use, provided we have a lawful basis to do so.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. 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, and how to manage them, please see our [cookie policy](#).

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5) Disclosures of your personal data**

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

- Companies within the OPM group of companies
- External third parties as follows:
  1. Service providers acting as processors who provide IT and system administration services;
  2. Professional advisers acting as processors including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services and security advisers;
  3. Our Suppliers including where we provide services to clients;
  4. HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances;
  5. Third parties for the purposes of processing an application to work with us such as organisations for due diligence purposes or providers of testing services and recruitment agents;
  6. Clients or potential clients for marketing purposes;
  7. Regulators law enforcement agencies and other agencies and authorities such as the Disclosure Barring Service (or its equivalent),
- 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 we engage as processors 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 written instructions.

## **6) International transfers**

We may share your personal data with companies (who may or may not be part of the OPM group of companies), service providers, regulators and other parties outside of the EU. This will involve transferring your data outside the European Economic Area (EEA) in some instances to jurisdictions where privacy rights and standards may be less stringent than they are in the EU. Where we share your personal data outside of the EEA to parties, we will ensure a similar degree of protection as that in the EU is afforded to your personal data and ensure that there are appropriate safeguards are in place to protect your personal data and rights in respect of that data.

If you apply to work with us on a project based outside the EEA, your personal data may be provided to our staff, consultants, suppliers, clients and other organisations working with us on the project and who are located in countries outside of the EEA where standards of data protection are



not as stringent as those that apply within the EEA. Such transfer shall be necessary for considering your application or for our proposal to be considered by a client.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 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 need to know. 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 supervisory authority or 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.

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.

In the case of an application for a vacancy submitted using an OPM site, we will retain your information for six months from the advertised closing date after which it will be destroyed unless you request otherwise.

## 9) Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as set out below.

**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 or any processing that we are carrying out under another lawful basis. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your 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 the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. 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.

**Consent** means processing your personal data on the basis of your informed consent which is freely given and is unambiguous. You are entitled to withdraw your consent at any time. OPM relies on consent as a basis for processing when undertaking marketing and promotional activities e.g. newsletter publication and for media releases e.g. videos and photographs. We also seek your consent when undertaking social research on behalf of our clients, for example, surveying households regarding income and expenditure patterns. There are other circumstances where “consent” may be used as a basis for our processing, but these are limited and are determined on a case by case basis