

## Legal and Ethical Policies

We work internationally, conducting ethnographic research for our clients.

We're conscious that the work we do gives us extremely privileged and up-close access to the people we work with, that's why we've always put privacy, data protection and respect for individuals at the core of our company culture and operations.

We endorse the American Anthropological Association's (AAA) statement [LINK] on ethics. We believe this is the most comprehensive guide to ethical research conduct. We are compliant with all relevant data legislation, notably GDPR. More than that though we aim to embody the spirit of the legislation.

<http://ethics.americananthro.org/category/statement/>

### Our Legal Basis for collecting data

We reassess our legal basis for collecting data with every project. Our default justification for data collection is legitimate commercial interest. We are a company that provides recommendations to commercial clients based on human insights. This requires us to collect a range of data from consenting research participants.

We have a 'privacy by design approach' to projects which ensures that before we start work with our clients we ask what sort of data we need to be collecting.

If you'd like to see our Legitimate Impact Assessment (LIA) please send an email to [alexander.rice@stripepartners.com](mailto:alexander.rice@stripepartners.com). We'll be happy to provide you with a copy.

### What kind of data do we collect?

Every project we work on is different, meaning we collect various types of data. We will usually collect personal data in 2 stages. The research participants we work with will always have given explicit, informed consent for us to source the data we'll be collecting on them.

#### From recruiters

When we have decided what kinds of participants we need to do research with, we will present an independent recruiter with the criteria. They will then recruit people to our specifications via a range of methods including email, social media and sign up through their website. We will usually be sent this basic information about our respondents in the form of an encrypted excel spreadsheet. We always ensure the recruiters we work with uphold the same data standards that we do.

#### From our research respondents

The primary way we collect research data is through face to face ethnographic fieldwork. When we conduct research, we do home visits and activities with respondents where we take photos, videos and notes. What we use this data for will always be clearly stipulated in consent forms but may include presentations to clients, company promotional material, exercise development and other internal uses. We never allow clients to use research respondent data for any other purpose without the express permission of the respondents involved.

We may also connect with our research respondents through social media or messaging applications as part of the research process.

### **How we keep our research participants' data confidential and safe**

We take a number of measures to keep the data we collect secure. These include:

- Staff training on data protection
- All names are made anonymous as soon as we process personal data
- Encryption of all personal data
- Deleting data when it is no longer being used
- Rigorous compliance assessment of 3rd parties who use data
- Constantly reviewing our processing

### **Sensitive/special categories of data**

From time to time and dependent on the needs of particular projects, we collect data that we deem particularly sensitive. This could relate to ethnicity, religious views or health. When we undertake a project likely to produce this kind of data we will always conduct an impact assessment dealing with the particular risks and precautions we'll take over the course of that work.

### **Who we share respondent data with**

We'll never share respondent data outside the groups respondents have consented to having it shared with. In practice respondent data is likely to be used and shared with the following:

**Clients:** We're enlisted by companies to conduct research for them and use it to advise them on strategy. The rich data set we develop in the field will almost invariably be used in a presentation which will be circulated around the company.

**Within Stripe Partners:** Data contained in final project presentations are likely to remain within Stripe Partners for use in training and as a point of reference.

**Paper or case study writing:** From time to time we may want to write up and talk about our work within the industry. We'll use data from previous projects to tell our story in an accurate way.

### **Transferring data outside of the EEA**

Our projects regularly require us to transfer data outside of the European Economic Area. We'll always have an agreement in place with the extra party ensuring their policies live up to our legal obligations and high company standards of data protection.

We also work in countries outside 'adequate rated' areas. In these instances we will conduct extra due diligence on the companies we work with. If we are not entirely convinced that they will be able to meet our standards for data protection we will not work with them.

Due diligence may include:

- A phone call or face to face conversation to address any concerns we have
- A rigorous assessment of that company's previous work
- A site visit to the company headquarters
- Extra contractual obligations placed on the company

**Withdrawing data**

Respondents have the right to withdraw data we hold at any time and can exercise that right by contacting us at [alexander.rice@stripepartners.com](mailto:alexander.rice@stripepartners.com) (or via the form below). If you withdraw before completing the project you may not receive the agreed incentive for completing it.

Respondents have the right to ask us not to process their personal data for marketing purposes. We will ask you for your consent if we intend to use your data for such purposes. You can also exercise the right for deletion of your data for marketing purposes at any time by contacting us.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

**Access Requests**

Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the GDPR legislation. Please submit your access request to: [alexander.rice@stripepartners.com](mailto:alexander.rice@stripepartners.com)

**Changes to your information**

Personal data we hold must be up to date and accurate. Please inform us if your circumstances change and information we hold on you is no longer relevant. We will take the necessary steps to delete your information or update it.

If there are any changes to your information, or if you would like to submit a request for deletion of your data, then please contact us at: [alexander.rice@stripepartners.com](mailto:alexander.rice@stripepartners.com)

**If you want to transfer your data**

All the data we hold on you is documented and filed for easy access. We're happy and able to make this available to you should you wish to transfer to another processor.

**Automated decision making**

We do not conduct any entirely automated data actions within Stripe Partners. At our core, we believe in humanising data. Automatic decision making runs contrary to that ethic and undermines the deep insights we aim to provide through our work.

**Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page.

**How to complain or object to our practices**

You have a right to complain or object about any of our policies or actions to the ICO. You can contact them via their website: <https://ico.org.uk/>

### **Speak to us**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [alexander.rice@stripepartners.com](mailto:alexander.rice@stripepartners.com)

### **Guide**

We've consulted the following guide in the formulation of this document:

<https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notice-transparency-and-control/what-should-you-include-in-your-privacy-notice/>

May 2018