STRIPE PARTNERS

Know-how to invent the future

Stripe Partners Privacy Policy

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 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 also collect data from our and potential clients, employees and people interested in working with us, and suppliers in order to carry out our business.

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 field@stripepartners.com. We'll be happy to provide you with a copy.

Who we collect data from

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 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 research participants: 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.

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From potential and existing clients: we will collect personal data from our clients to create and manage client relationships, and to carry out projects. This will usually include full names, email address, phone number, company address and job title. Such personal data is stored in encrypted, cloud-based email platforms such as Google Mail. Upon request from our clients, this data will be securely deleted after a project has been completed.

When we conduct research, we sometimes take photos, videos and audio recordings of clients who take part in fieldwork and home visits. Upon request, this data can be securely deleted after a project has been completed. Clients can do this by emailing their contact at Stripe Partners.

From suppliers: we collect contact details and payment information from suppliers and partners in order to work together. We always review suppliers' privacy policies, and where appropriate we sign data sharing agreements.

From job applicants and employees: we collect personal data from job applicants and employees for the purpose of hiring people to join our team and meeting our responsibilities as an employer. This includes full name, email address, phone number, home address, CV, and for employees, date of birth, bank details, National Insurance number and photos. We only share personal data about applicants and employees with people who need to know this information. Personal data is stored in encrypted, cloud-based platforms such as GSuite, CharlieHR and Box, with restricted access. Physical copies are stored in a locked cupboard. Photos of our employees are shared on our website, in marketing materials and client reports.

From newsletter subscribers: we collect email addresses from people so that we can send them a newsletter with updates on our work and thinking. We don't use soft opt-in, meaning newsletter subscribers won't receive any marketing communications from us unless they have specifically agreed to it. Email addresses are stored in Mailchimp. There is a link on every newsletter for subscribers to unsubscribe. We regularly review unsubscribes and delete their email addresses.

What kind of research data 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.

We collect the following information from research participants:

- Participant information
- Full name
- Telephone number
- Email address
- Address

In consent forms:

- Full name
- Email
- Signature

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In research material:

- Audio or video recordings
- Interview transcripts
- Researcher notes
- Photos

Sensitive/special categories

From time to time and dependent on the needs of particular projects, we collect data about research participants that we deem particularly sensitive.

For example:

- Ethnicity
- Religious views
- Health information

We only collect this data when we have participant consent. 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.

Why we collect research data

We collect research participant information to identify participants and to arrange research sessions and follow-ups.

All research participants are given a consent form that outlines what the research involves, what information will be recorded and how it will be used. If the participant is happy to proceed we ask them to sign the form to confirm this. We give all participants a copy of the form, which includes our contact information if they change their mind after the research takes place.

We sometimes share research materials with current and possible future clients who are interested in learning about our work and asking Stripe Partners to organise similar projects for them.

Sometimes we use material collected during research to illustrate our work on our website, in blog posts, in printed marketing materials, and in presentations given at conferences or meetups. We only use personally identifiable images, video or audio when we have explicit consent from research participants. All research participants are given a marketing consent form that outlines what information and materials will be collected and how it will be used in our marketing activities. If the participant is happy to proceed, we ask them to sign the form to confirm this. We give all participants a copy of the form, which includes our contact information if they change their mind after the research takes place.

Who we share research data with

In practice research participant 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 research material we collect will be used in presentations, and may be used in other communications

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such as video and posters. These are often circulated company wide. We also often share anonymised transcripts with our client.

Within Stripe Partners: Research material collected during projects may be used in training and as a point of reference.

Delivery partners: To help deliver a project, we sometimes work with third party partners. For example, we may send audio of the research session to a transcriber or share video with a filmmaker. We review the privacy notices of the companies we use for this.

Marketing materials: We may want to write up and talk about our work within the industry. We'll use research material from previous projects to tell our story in an accurate way.

How we keep data confidential and safe

We take a number of measures to keep the data we collect secure and ensure that staff receive training on keeping data protection. We take measures to ensure that third party suppliers and research partners who we share confidential data with and who share data with us, comply with our data protection and privacy policies.

In the case of research participants, we only use participant's real first names when arranging the research session and any follow-up activities. We use a pseudonym for participants in all the research material and in all file names. We anonymise transcripts, removing personally identifiable information mentioned during the course of the research such as names, where the participant lives, their place of work.

We encrypt all personally identifiable data. We receive and share all personally identifiable data through secure, encrypted cloud services and store it on password protected cloud services, such as Google Drive, Box or Dropbox.

We regularly review how we process confidential data. We regularly review the personally identifiable data we hold using our information retention matrix, in order to check whether we still need it, and if not, we delete it using a secure deletion tool.

How long we keep data

Research participants: We delete participant information such as names and contact details, at the end of a project. This includes deleting any emails or text messages used to arrange the research or subsequent follow-up activities.

We keep videos, audio, personally identifiable images and consent forms for up to 1 year after a project is completed so that we and our clients can use it in reference to the project. At the end of this retention period we delete them using a secure deletion tool.

If participants have given explicit consent for their information to be used for marketing purposes then we will keep videos, audio, personally identifiable images and consent forms for up to 5 years. At the end of this retention period we delete them securely.

We keep anonymised transcripts, notes and images that are not personally identifiable indefinitely.

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Clients, suppliers and partners: we keep contact information for clients, suppliers and partners indefinitely as we often work with them again. Clients, suppliers and partners can contact their Stripe Partners contact if they would like to delete their information.

Employees: we delete data about employees 6 years after they leave Stripe Partners, in line with the law.

Job applicants: we keep data about job applicants for up to a year after their application, as there are sometimes cases where we recontact an applicant when a new job becomes available

Newsletter subscribers: we review and delete email unsubscribes at least once a year.

Transferring data outside of the EEA

Our projects regularly require us to transfer data outside of the European Economic Area, as our clients and research projects are global. 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

Your data rights

The General Data Protection Regulation gives you rights over data about you.

- To be informed as to how we will use data about you
- To access data about you, and change any data we hold on you if it needs updating or correcting
- To have data about you erased
- To restrict processing of data about you
- To transfer data about you to another processor
- To object to how we collect or use data about you and to complain to the relevant authority

To exercise any of these rights, please email field@stripepartners.com. We will respond to all requests within 28 days of receiving them.

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.

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Third party links

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.

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 field@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-notices-transparency-and-control/what-should-you-include-in-your-privacy-notice/

Updated on 11 February, 2020 – version 2

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