

Shopper Privacy Policy:

Newlann recognises that it is vital for us to comply with the new General Data Protection Regulation (GDPR) regulations (which commence 25th May 2018) and to ensure robust business security measures.

We hold information on your name, address and post code, telephone number, email address and bank details (for payment). We hold this for legitimate business reasons in order to allocate work to you and to pay for tasks completed.

You opted in to our panel and are able to unsubscribe at any time you wish.

All information is held securely and Newlann is endeavouring to fully meet obligations under the GDPR.

Under the GDPR, there are six data protection principles that we must comply with. This means that the personal information we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

We collected this information when you signed up. Your personal information may be stored in different places, including online and in other IT systems, such as the e-mail system.

We will only use your personal information when the law allows us to do so as to perform the contract for services we have entered into with you.

The purpose for which we are processing, or will process, your personal information is to enable us to maintain accurate and up-to-date shopper records and contact details, assess your suitability for a mystery shop, maintain an accurate record of details, ensure you are paid correctly, contact you with available mystery shops in your area, manage, plan and organise mystery shops and prevent fraud.

Your personal information may be shared internally within Newlann but not outside it. We never use your details for any marketing purposes.

We have put in place measures to protect the security of your personal information. We have internal policies, procedures and controls in place to prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees who have a business need to know in order to perform their job duties and responsibilities.

We also have in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

Newlann will hold your personal information for as long as you are an active shopper with us. If you unsubscribe or your engagement is terminated, we will delete your personal information but hold on to the project data you have submitted for six years in order for us to have a history of previous assignments. This is also to protect against legal risk, e.g. if the data could be relevant to a possible

legal claim. We will also keep shopper fee records for seven years after the termination of your engagement for accounting and tax purposes.

Please keep your online profile up to date and review the information regularly. We cannot be held responsible for any errors in your personal information in this regard.

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to request access to your personal information, request rectification of your personal information, request the erasure of your personal information, restrict the processing of your personal information and object to the processing of your personal information.

If you wish to exercise any of these rights, please contact enquiries@newlann.com. We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it. In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal.

If you wish to withdraw your consent, please contact enquiries@newlann.com. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis for processing.

Contact Newlann (enquiries@newlann.com) if you have any questions about this privacy notice or how we handle your personal information.