

# Privacy Policy

## Information about who we are and what we do

Beyond Blue is a specialist independent agency which delivers strategic pharmaceutical market research and insight.

Beyond Blue is a private limited company which is registered in the UK, company number: 09816652.

In this policy ‘**Beyond Blue,**’ ‘**we,**’ and ‘**us,**’ means **Beyond Blue Insight Limited.**

Beyond Blue is a data controller and is responsible for personal data collected when fulfilling the main purposes of business as a market research and insight agency. Beyond Blue is registered with the Information Commissioner’s Office (ICO), registration number: ZA325084.

## About this Privacy Policy

This privacy policy explains what happens to the personal data Beyond Blue receive. Personal data is defined as any piece of information that could be used to identify you, either on its own or in combination with other data. For example, your name or contact details would certainly be personal data, but so might your job title, if combined with your place of work, for instance. All personal data provided to us will be handled in accordance with this policy.

This policy applies to Beyond Blue Insight Ltd., who are processing personal data under the UK General Data Protection Regulation, UK Data Protection Act 2018 (UK GDPR) and the EU General Data Protection Regulation (EU GDPR).

The Beyond Blue Privacy Policy applies to our data practice generally and includes region specific requirements including the UK and the European Economic Area.

## Contact details for Beyond Blue Compliance Team

If you have any questions or concerns about this Privacy Policy or Beyond Blue’s data protection practices, please contact:

Email: [compliance@beyondblueinsight.com](mailto:compliance@beyondblueinsight.com)

Address: Ministry of Work, 41 New Cross Street, Swinton, Manchester, M27 4TU, UK

## Sections

- For market research participants
- For clients
- For people applying for jobs with Beyond Blue
- For Beyond Blue employees
- California Consumer Privacy Notice

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- Changes to this Privacy Policy
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## For market research participants

### What personal data is collected on me?

Beyond Blue may store personal data that you provide to us when agreeing to participate in our market research projects. We also may compile lists based upon personal data readily available to us in the public domain.

There are different categories of personal data about you which we might collect, use, store, or transfer. In addition to these specific categories of data, we might in relation to any interaction collect a range of other data for the purposes outlined below. We have provided some illustrations of the type of personal data which might fall into each category:

- Identity Data** could include your first name, last name, username, or similar identifier, plus job roles and/or responsibilities, and would be collected when individuals or organisations agree to become participants in Beyond Blue’s research projects.
- Contact Data** could include your home or work address, email address, telephone numbers or another unique identifier for use with electronic communication and would be collected to enable you to become participants for Beyond Blue’s research projects.
- Financial Data** could include bank account and payment details to enable Beyond Blue to provide payments, for example financial incentives.
- Technical Data** could include your internet protocol (IP) address, browser type and version, operating system and platform, and information about other technology on the devices you use to access the Beyond Blue’s website or online surveys or platforms etc.
- Usage Data** could include information about how you enter, move, and exit from our website, or online surveys or platforms, and how you use our products and services.
- Aggregated Data** such as statistical, research, survey, or demographic data for any purpose. Aggregated Data could be derived from your personal data, but this data will not directly or indirectly link to you as an identifiable individual. However, if we combine or connect Aggregated Data with other data so that it can be linked directly or indirectly to you, we treat the combined data as personal data which will only be used in accordance with this privacy notice.
- Special category data** is generally limited to health data which is collected as part of our market research services. When we need such information, we will ensure that we have a lawful basis for our processing of it.

### How do Beyond Blue collect personal data?

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

**Directly:** You may give us your identity, contact and financial data when you agree to be a participant in a Beyond Blue project.

**Automated technologies or interactions:** As you interact with Beyond Blue’s website or online surveys or platforms, our digital systems may automatically collect technical data and usage data about your equipment, browsing actions, etc. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

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**User generated data:** We may generate transaction, usage, marketing, and communications data about you, by way of records of the direct and automated interactions that you have with us or our website.

**Third parties:** We will receive personal data about you if you use our website from various third parties such as via analytics providers e.g., Google Analytics.

## What is my personal data used for and what is the lawful basis for this?

We rely upon consent or legitimate interest to collect and use your personal data. You can remove your consent at any time. You can do this by contacting Beyond Blue's Compliance Team via the Contact details for Beyond Blue Compliance Team at the top of this page.

Your personal contact data (for example name, phone number, email address) is used to contact you to complete the market research activity (for example an interview or online survey). It may also be used to re-contact you after the research if you have given your consent for us to do so e.g., follow up calls to complete the market research.

When you participate in research, the responses you provide to the research questions may include personal data, e.g., if you have a health condition and you choose to share data about your health condition, or if you are a healthcare provider and name or describe the setting where you work. This data is collected to fulfil the research objectives, and will be anonymised, or pseudonymised, at the earliest opportunity.

Sometimes we compile lists of personal data already in the public domain to identify and contact opinion leaders in a particular field, to issue an invitation to participate in specific market research project(s).

Any personal data we gather about you is used for market research purposes only, to help pharmaceutical companies and other clients develop and improve their products and services.

If Beyond Blue is paying incentives directly to research participants, then your bank details will be stored to ensure payment can be made.

## Who has access to my personal data?

We will never share, rent, or sell your personal data to any third party for the purpose of directly marketing any products or services.

If you have given us specific consent to do so, we may share your personal data with the client sponsoring the market research, so that they can directly read, view, or listen to the outcomes of the market research to allow them to understand it better. For example, if you take part in a group discussion, we may share digital audio or video footage of the discussion with the client sponsoring the market research, as long as everyone involved in the group discussion has agreed that they are happy for that to happen.

In some cases, we may need to share personal data with other suppliers (third parties) who we subcontract to provide research services, as follows:

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- Experienced moderators (interviewers): if we subcontract them to interview you, they may need your contact details to conduct the interview, and with your consent they may audio or video record the interview and provide us with the recording.
- Transcription or analysis agencies: we may share an audio or video recording of a market research interview with a subcontractor purely for the purpose of transcription or analysis (i.e., they will type the contents of the interview for us, either word for word, or in a summarized manner) so that we do not have to revisit the audio recording. Where possible, we will let you know if this is required before the interview takes place.
- Film editing companies: may clip or blur video footage on our behalf. Where possible, we will let you know if this is required before the market research interview takes place.
- Data processing companies: we may share a digital datafile containing your (and other participants’) survey responses with a subcontractor purely for the purposes of processing the data into a format that we need for analysis (e.g., they may convert the data into aggregated summaries and descriptive statistics).

Any subcontracted supplier that receives your personal data from Beyond Blue will only use it to complete a specific task as specified by Beyond Blue, they are what is called data processors and must follow the same data protection laws as Beyond Blue.

If we ever need to share your personal information with companies based outside of the UK or European Union (EU)/European Economic Area (EEA) (Third Countries), we do this using contractual clauses ensuring appropriate data protection safeguards can be used as a ground for data transfers from the EU to Third Countries. This includes model contract clauses – so-called standard contractual clauses (SCCs) – that have been “pre-approved” by the European Commission.

## How will my personal data be stored?

We enforce all reasonable physical, electronic, and procedural security measures to keep your personal data safe. All personal information is:

- Pseudonymised at the first opportunity (so it cannot be linked back to you without matching it with other data that is stored separately)
- Password protected and encrypted OR stored under lock and key (in the case of hard copies)

We limit access to your personal data to those Beyond Blue employees, service suppliers, and other third parties who have a reason for needing your personal data e.g., to deliver a service on our behalf. They will only process your personal data on Beyond Blue’s instructions, and they are subject to a duty of confidentiality. We require all suppliers who may have access to your personal data to maintain security measures equivalent to ours.

The above procedures are supported by appropriate policies setting out the procedures we undertake. Despite all our precautions however, no data can be guaranteed to be 100% secure. So, while we strive to protect your personal information, we cannot guarantee the security of any information you send to us, and you must understand that you do so at your own risk.

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We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach, in a timely manner, where we are legally required to do so. We will endeavour to work with you and them to minimise the impact of the breach.

## How long will my personal data be stored for? And what happens to it after that?

We do not store any personal data for longer than needed. The exact length of time we keep it for might depend on specific client or market research project obligations or to fulfil other purposes such as satisfying any legal, regulatory, tax, accounting, or reporting requirements. We will tell you how long your personal information will be kept for before you take part in any market research activities.

We maintain a data retention policy which we apply to records in our care. Where your personal data is no longer required and we do not have a legal requirement to retain it, we will ensure it is either securely deleted or stored in a way such that it is anonymised (i.e., can never be linked back to you), and the personal data is no longer used by Beyond Blue.

To determine the appropriate retention period for personal data, we consider the data minimisation principle and balance the need for retention and the need for minimisation.

The actual retention periods for the different types of personal information that we hold is detailed in the [Beyond Blue Data Retention Policy](#).

## What are my rights?

You have rights in relation to your personal data as follows:

The right to be <b>informed</b>	Individuals have the right to be informed about the collection and use of their personal data.  This Privacy Policy provides information about how Beyond Blue collect and handle personal data in a clear and transparent way, and how to exercise your rights in relation to your personal data.
The right of <b>access</b>	Individuals have the right to access and receive a copy of their personal data, and other supplementary information.
The right to <b>rectification</b>	Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete.
The right to <b>erasure</b>	Individuals have the right to have personal data erased.
The right to <b>restrict processing</b>	Individuals have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted, your data are permitted to be stored but not used.
The right to <b>data portability</b>	Individuals have the right to obtain and reuse their personal data for their own purposes across different services. It allows them to move,

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	copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.
The right to <b>object</b>	Individuals have the right to object to the processing of their personal data in certain circumstances.  Individuals have an absolute right to stop their data being used for direct marketing.
Rights in relation to <b>automated decision making</b> and profiling	Individuals have rights to protect them if a company is carrying out automated decision-making that has legal or similarly significant effects on them.  Beyond Blue does not currently carry out automated decision making.

## How do I exercise my rights?

The primary point of contact for all issues arising from this Policy, including requests to exercise your rights is the **Compliance Team at Beyond Blue**. Contact details can be found in the earlier section: [Contact details for Beyond Blue Compliance Team](#) .

We may need to request specific information from you to 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.

We aim to respond to all legitimate requests within one month of the confirmation of the identity of the request. There may be occasions when requests take Beyond Blue longer to fulfil e.g., if a request is complex or involves a significant amount of data. If this applies, we will notify you and keep you updated.

If you remain dissatisfied, then you have the right to apply directly to the data protection supervisory authority (ICO) for a decision. The contact details can be found on the ICO website; [www.ico.org.uk](http://www.ico.org.uk)

## For clients

### What personal data is collected on me?

We may store any personal data that you provide to us when agreeing to use Beyond Blue's services (e.g. contact details such as phone number, email address, working history). We also may compile lists including personal data readily available to us in the public domain.

There are different categories of personal data about you which we might collect use, store, or transfer. In addition to these specific categories of data, we might in relation to any interaction, collect a range of other data for the purposes outlined below. We have provided some illustrations of the type of personal data which might fall into each category:

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- a) **Identity Data** could include your first name, last name, username or similar Identifier plus job roles and/or responsibilities information and would be collected when individuals or organisations agree to become clients of Beyond Blue.
- b) **Contact Data** could include your work address, email address, telephone numbers or another unique identifier for use with electronic communication and would be collected to enable you to become clients for Beyond Blue.
- c) **Financial Data** could include bank account and payment card details used by clients to pay for Beyond Blue’s services.
- d) **Technical Data** could include your internet protocol (IP) address, browser type and version, operating system and platform, and information about other technology on the devices you use to access the Beyond Blue’s website or online surveys, etc.
- e) **Usage Data** could include information about how you enter, move, and exit from our website, or online surveys and how you use our products and services.

## How do Beyond Blue collect personal data?

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

**Direct.** You may give us your identity, contact and financial data when you agree to be a client for Beyond Blue.

**Automated technologies or interactions.** As you interact with Beyond Blue’s website, our digital systems may automatically collect technical data and usage data about your equipment, browsing actions, etc. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

**User Generated Data.** We may generate transaction, usage, marketing and communications data about you, by way of records of the direct and automated interactions that you have with us or our website.

**Third parties.** We will receive personal data about you if you use our website from various third parties such as via analytics providers e.g., Google Analytics.

## What is my personal data used for and what is the lawful basis for this?

Your personal data is collected for the legitimate interest of contacting you about potential market research opportunities, or to offer you specific products or services. Once contracted to provide services Beyond Blue may use contract as the lawful basis.

## Who has access to my personal data?

We will never share, rent, or sell your personal data to any third party for the purpose of directly marketing any products or services.

Beyond Blue employees have access to your personal data. In some cases, we may need to share personal data with other suppliers (third parties) who we subcontract to provide research services, as follows:

- Experienced moderators (interviewers): if we subcontract them to conduct interviews that you wish to view live, they may have visibility of your email contact details on the invite for the interview.

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- Freelance researchers: if we subcontract them to support the delivery of our research projects, they may have visibility of your email contact details through project communications.

Any subcontracted supplier that receives your personal data from Beyond Blue will only use it to complete a specific task as specified by Beyond Blue, they are what is called data processors and must follow the same data protection laws as Beyond Blue.

If we ever need to share your personal information with companies based outside of the UK or European Union (EU)/European Economic Area (EEA) (Third Countries), we do this using contractual clauses ensuring appropriate data protection safeguards can be used as a ground for data transfers from the EU to Third Countries. This includes model contract clauses – so-called standard contractual clauses (SCCs) – that have been “pre-approved” by the European Commission.

## How will my personal data be stored?

We maintain all reasonable physical, electronic, and procedural security measures to help keep your personal data safe. All personal information is:

- Encrypted OR stored under lock and key (if hard copies kept)

We require all other suppliers who may have access to your personal data to maintain security measures equivalent to ours. In addition, we limit access to your personal data to those Beyond Blue employees, service suppliers, members, vendors and other third parties who have a reason for needing your personal data e.g., to deliver a service on our behalf. They will only process your personal data on Beyond Blue’s instructions, and they are subject to a duty of confidentiality.

The above procedures are supported by appropriate policies setting out the procedures we undertake. Despite all our precautions however, no data can be guaranteed to be 100% secure. So, whilst we strive to protect your personal information, we cannot guarantee the security of any information which you send to us, and you must understand that you do so at your own risk.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach, in a timely manner, where we are legally required to do so. We will endeavour to work with you and them to minimise the impact of the breach.

## How long will my personal data be stored for? And what happens to it after that?

We do not store any personal data for longer than needed. The exact length of time we keep it for might depend on specific client obligations or to fulfil other purposes such as satisfying any legal, regulatory, tax, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the data minimisation principle and balance the need for retention and the need for minimisation.

Project records are typically subject to a retention period of up to 10 years. Contact details on our mailing list are retained until you notify us that you no longer wish to receive marketing emails from Beyond Blue.

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Where your personal data is no longer required and we do not have a legal requirement to retain it, we will ensure it is either securely deleted or stored in a way such that it is anonymised and the personal data is no longer used by Beyond Blue.

## What are my rights?

You have rights in relation to your personal data as follows:

The right to be <b>informed</b>	Individuals have the right to be informed about the collection and use of their personal data.  This Privacy Policy provides information about how Beyond Blue collect and handle personal data in a clear and transparent way, and how to exercise your rights in relation to your personal data.
The right of <b>access</b>	Individuals have the right to access and receive a copy of their personal data, and other supplementary information.
The right to <b>rectification</b>	Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete.
The right to <b>erasure</b>	Individuals have the right to have personal data erased.
The right to <b>restrict processing</b>	Individuals have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted, your data are permitted to be stored but not used.
The right to <b>data portability</b>	Individuals have the right to obtain and reuse their personal data for their own purposes across different services. It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.
The right to <b>object</b>	Individuals have the right to object to the processing of their personal data in certain circumstances.  Individuals have an absolute right to stop their data being used for direct marketing.
Rights in relation to <b>automated decision making</b> and profiling	Individuals have rights to protect them if a company is carrying out automated decision-making that has legal or similarly significant effects on them.  Beyond Blue does not currently carry out automated decision making.

## How do I exercise my rights?

The primary point of contact for all issues arising from this Policy, including requests to exercise your rights is the **Compliance Team at Beyond Blue**. Contact details can be found in the earlier section: Contact details for Beyond Blue Compliance Team.

We may need to request specific information from you to confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security

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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.

We aim to respond to all legitimate requests within one month of the confirmation of the identity of the request. There may be occasions when requests take Beyond Blue longer to fulfil e.g., if a request is complex or involves a significant amount of data. If this applies, we will notify you and keep you updated.

If you remain dissatisfied, then you have the right to apply directly to the data protection supervisory authority (ICO) for a decision. The contact details can be found on the ICO website; [www.ico.org.uk](http://www.ico.org.uk)

## For people applying for jobs with Beyond Blue

### What personal data is collected on me?

Beyond Blue may store personal data about you that is provided to us when you apply for a job with Beyond Blue.

There are different categories of personal data about you which we might collect, use, store, or transfer. In addition to these specific categories of data, we might in relation to any interaction collect a range of other data for the purposes outlined below. We have provided some illustrations of the type of personal data which might fall into each category:

- a) **Identity Data** could include your first name, last name, ID (e.g. copy of passport)
- b) **Contact Data** could include your home or work address, email address, telephone numbers or another unique identifier for use with electronic communication and would be collected to enable Beyond Blue to contact you in relation to your job application and to invite you to an interview.
- c) **Educational and employment data** could include educational certificates, details of current and historical job roles and/or responsibilities, other such information as would typically be included on a CV or job application, and references.

### How do Beyond Blue collect personal data?

Much of the personal data we store, and process will have been provided by you, but some may come from other external sources, such as referees.

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

**Direct.** You may give us your identity, contact and employment history when you apply to work for Beyond Blue.

**Automated technologies or interactions.** As you interact with Beyond Blue's website, our digital systems may automatically collect technical data and usage data about your equipment, browsing actions, etc. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

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**Third parties.** We will receive personal data about you if you use our website from various third parties such as via analytics providers e.g., Google Analytics. We may also receive personal data about you if you provide us with referees and they provide us with a reference for you.

### What is my personal data used for and what is the lawful basis for this?

Beyond Blue needs to keep and process personal data about you for recruitment purposes. The personal data we store, and process will be used for our management and administrative use only.

We will keep and use the personal data to enable us to run the business and manage our relationship with you effectively, lawfully, and appropriately, during the recruitment process.

This includes using personal data to enable us to comply with any legal requirements, pursue the legitimate interests of Beyond Blue and protect our legal position in the event of legal proceedings.

### Who has access to my personal data?

We will never share, rent, or sell your personal data to any third party for the purpose of directly marketing any products or services.

Your personal data is accessible by:

- Beyond Blue’s Recruitment Team

### How will my personal data be stored?

We maintain all reasonable physical, electronic, and procedural security measures to keep your personal data safe. All personal information is:

- Encrypted OR stored under lock and key (if hard copies kept)
- Only accessible to colleagues who have been authorised.

We require all other companies who may have access to your personal data to maintain security measures equivalent to ours. In addition, we limit access to your personal data to those Beyond Blue employees, service suppliers, members, vendors and other third parties who have a reason for needing your personal data e.g., to deliver a service on our behalf. They will only process your personal data on Beyond Blue’s instructions, and they are subject to a duty of confidentiality.

The above procedures are supported by appropriate policies setting out the procedures we undertake. Despite all our precautions however, no data can be guaranteed to be 100% secure. So, whilst we strive to protect your personal information, we cannot guarantee the security of any information which you send to us, and you must understand that you do so at your own risk.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach, in a timely manner, where we are legally required to do so. We will endeavour to work with you and them to minimise the impact of the breach.

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## How long will my personal data be stored for? And what happens to it after that?

We do not store any personal data for longer than needed. Your personal data collected during recruitment will be stored for a period of up to 6 months if you are unsuccessful in your job application. If your application is successful, your data will be retained as specified under the section of this policy for ‘Employees’.

To determine the appropriate retention period for personal data, we consider the data minimisation principle and balance the need for retention and the need for minimisation.

We maintain a data retention policy which we apply to records in our care. Where your personal data is no longer required and we do not have a legal requirement to retain it, we will ensure it is either securely deleted or stored in a way such that it is anonymised and the personal data is no longer used by Beyond Blue.

## What are my rights?

You have rights in relation to your personal data as follows:

The right to be <b>informed</b>	Individuals have the right to be informed about the collection and use of their personal data.  This Privacy Policy provides information about how Beyond Blue collect and handle personal data in a clear and transparent way, and how to exercise your rights in relation to your personal data.
The right of <b>access</b>	Individuals have the right to access and receive a copy of their personal data, and other supplementary information.
The right to <b>rectification</b>	Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete.
The right to <b>erasure</b>	Individuals have the right to have personal data erased.
The right to <b>restrict processing</b>	Individuals have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted, your data are permitted to be stored but not used.
The right to <b>data portability</b>	Individuals have the right to obtain and reuse their personal data for their own purposes across different services. It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.
The right to <b>object</b>	Individuals have the right to object to the processing of their personal data in certain circumstances.  Individuals have an absolute right to stop their data being used for direct marketing.

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Rights in relation to <b>automated decision making</b> and profiling	Individuals have rights to protect them if a company is carrying out automated decision-making that has legal or similarly significant effects on them.  Beyond Blue does not currently carry out automated decision making.
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## How do I exercise my rights?

The primary point of contact for all issues arising from this Policy, including requests to exercise your rights is the **Compliance Team at Beyond Blue**. Contact details can be found in the earlier section: [Contact details for Beyond Blue Compliance Team](#).

We may need to request specific information from you to 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.

We aim to respond to all legitimate requests within one month of the confirmation of the identity of the request. There may be occasions when requests take Beyond Blue longer to fulfil e.g., if a request is complex or involves a significant amount of data. If this applies, we will notify you and keep you updated.

If you remain dissatisfied, then you have the right to apply directly to the data protection supervisory authority (ICO) for a decision. The contact details can be found on the ICO website; [www.ico.org.uk](http://www.ico.org.uk)

## Employees

### What personal data is collected on me?

Beyond Blue may store personal data about you that is provided to us when you apply for a job with Beyond Blue and will retain this and additional personal data collected throughout the course of your employment.

There are different categories of personal data about you which we might collect, use, store, or transfer. In addition to these specific categories of data, we might in relation to any interaction collect a range of other data for the purposes outlined below. We have provided some illustrations of the type of personal data which might fall into each category:

- a) **Identity Data** could include your first name, last name, ID (e.g. copy of passport).
- b) **Contact Data** could include your home address, email address, telephone numbers or another unique identifier for use with electronic communication and would be collected to enable Beyond Blue to contact you during your employment, emergency contact details.
- c) **Educational and employment data** could include educational certificates, details of current and historical job roles and/or responsibilities, other such information as would typically be included on a CV or job application, and references.

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- d) **Contractual data** including your initial employment contract, any amendments to it, furlough records.
- e) **Financial data** such as your bank details which are required for payroll.
- f) **Correspondence** with you or about you such as letters about a promotion, pay rise or bonus.
- g) **Performance data** including records relating to conduct.
- h) **Attendance data** including records of holiday, sickness, and other absence.

## How do Beyond Blue collect personal data?

Much of the personal data we store, and process will have been provided by you, but some may come from other internal sources, such as your line manager, or in some cases, external sources, such as referees.

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

**Direct.** You will give us your identity, employment history, contact and financial data when you agree to be a staff member for Beyond Blue.

**Automated technologies or interactions.** As you interact with Beyond Blue’s website and digital systems, we may automatically collect technical data and usage data about your equipment, browsing actions, etc. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

**User Generated Data.** We may generate transaction, usage, and communications data about you, by way of records of the direct and automated interactions that you have with us or our website or systems.

**Colleagues within Beyond Blue.** Your line manager and colleagues will be asked to provide data about your work performance.

**Third parties.** We will receive personal data about you from various third parties including former employers and via analytics and technological systems you use as a staff member of Beyond Blue.

## What is my personal data used for and what is the lawful basis for this?

As your employer, Beyond Blue needs to store and process personal data about you for normal employment purposes. The personal data we store and process will be used for our management, administrative use only and to comply with Employment Law. We will keep and use the personal data to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have exited the company.

This includes using personal data to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of Beyond Blue and protect our legal position in the event of legal proceedings.

You will, of course, inevitably be referred to in many company documents and records (e.g. proposals) that are produced by you and your colleagues while carrying out your duties and the business of Beyond Blue.

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## Who has access to my personal data?

We will never share, rent, or sell your personal data to any third party for the purpose of directly marketing any products or services.

Your personal data is accessible by:

- Human Resources Department – full access to all your data held on file.
- Line Manager – access to limited aspects of your data.
- Directors – access to limited aspects of your data.
- Payroll – access to limited aspects of your data.
- Finance Manager – access to limited aspects of your data.

In some cases, we may need to share aspects of your personal data with other suppliers (third parties) who we subcontract to provide research services, as follows:

- Payroll: we subcontract payroll services to a third party and only share with them the personal data they require to complete payroll services.
- Providers of other employee services: such as pensions, Employee Assistance Programmes etc.

Any subcontracted supplier that receives your personal data from Beyond Blue will only use it to complete a specific task as specified by Beyond Blue, they are what is called data processors and must follow the same data protection laws as Beyond Blue.

## How will my personal data be stored?

We maintain all reasonable physical, electronic, and procedural security measures to keep your personal data safe. All personal information is:

- Encrypted OR stored under lock and key (if hard copies kept)
- Only accessible to colleagues who have been authorised.

We require all other suppliers who have access to your personal data to maintain security measures equivalent to ours. In addition, we limit access to your personal data to those Beyond Blue employees, service suppliers, members, vendors and other third parties who have a reason for needing your personal data e.g., to deliver a service on our behalf. They will only process your personal data on Beyond Blue’s instructions, and they are subject to a duty of confidentiality.

The above procedures are supported by appropriate policies setting out the procedures we undertake. Despite all our precautions however, no data can be guaranteed to be 100% secure. So, whilst we strive to protect your personal information, we cannot guarantee the security of any information which you send to us, and you must understand that you do so at your own risk.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach, in a timely manner, where we are legally required to do so. We will endeavour to work with you and them to minimise the impact of the breach.

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## How long will my personal data be stored for? And what happens to it after that?

We do not store any personal data for longer than needed.

To determine the appropriate retention period for personal data, we consider the data minimisation principle and balance the need for retention and the need for minimisation.

We maintain a data retention policy which we apply to records in our care. Where your personal data is no longer required and we do not have a legal requirement to retain it, we will ensure it is either securely deleted or stored in a way such that it is anonymised, and the personal data is no longer used by Beyond Blue.

Your personal data will be stored in accordance with the appropriate statutory retention periods. The actual retention periods for the different types of personal information that we hold is detailed in the Beyond Blue Data Retention Policy.

After this point, all copies of your personal data (including any hard copies) will be safely and securely destroyed.

## What are my rights?

You have rights in relation to your personal data as follows:

The right to be <b>informed</b>	Individuals have the right to be informed about the collection and use of their personal data.  This Privacy Policy provides information about how Beyond Blue collect and handle personal data in a clear and transparent way, and how to exercise your rights in relation to your personal data.
The right of <b>access</b>	Individuals have the right to access and receive a copy of their personal data, and other supplementary information.
The right to <b>rectification</b>	Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete.
The right to <b>erasure</b>	Individuals have the right to have personal data erased.
The right to <b>restrict processing</b>	Individuals have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted, your data are permitted to be stored but not used.
The right to <b>data portability</b>	Individuals have the right to obtain and reuse their personal data for their own purposes across different services. It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.
The right to <b>object</b>	Individuals have the right to object to the processing of their personal data in certain circumstances.

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	Individuals have an absolute right to stop their data being used for direct marketing.
Rights in relation to <b>automated decision making</b> and profiling	Individuals have rights to protect them if a company is carrying out automated decision-making that has legal or similarly significant effects on them.  Beyond Blue does not currently carry out automated decision making.

## How do I exercise my rights?

The primary point of contact for all issues arising from this Policy, including requests to exercise your rights is the **Compliance Team at Beyond Blue**. Contact details can be found in the earlier section: [Contact details for Beyond Blue Compliance Team](#).

We may need to request specific information from you to 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.

We aim to respond to all legitimate requests within one month of the confirmation of the identity of the request. There may be occasions when requests take Beyond Blue longer to fulfil e.g., if a request is complex or involves a significant amount of data. If this applies, we will notify you and keep you updated.

If you remain dissatisfied, then you have the right to apply directly to the data protection supervisory authority (ICO) for a decision. The contact details can be found on the ICO website; [www.ico.org.uk](http://www.ico.org.uk)

## California Consumer Privacy Notice

We are committed to protecting the privacy of California residents and complying with the California Consumer Privacy Act (CCPA). This section outlines how we collect, use, and disclose personal information in accordance with this regulation.

### Personal Information Collected

We may collect the following categories of personal information from California residents:

- **Identifiers:** This may include real name, alias, postal address, unique personal identifier (such as cookies, unique pseudonym, or user alias; telephone number and other forms of identifiers), internet protocol address, account name, email addresses, phone numbers and other similar identifiers or contact details that you may volunteer to us.
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, colour, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status.

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- **Commercial Information:** Information related to transactions, products or services purchased, obtained, or considered.
- **Internet or Other Electronic Network Activity:** Data on website visits, browsing history, and interactions with our digital platforms.
- **Geolocation Data**
- **Sensory Information:** audio, electronic, visual, and similar information.
- **Professional or Employment-Related Information:** Job titles, company affiliations, and industry roles.

## Purpose of Collection

We collect personal information for the following purposes:

1. **Market Research:** To conduct market research studies on behalf of pharmaceutical clients.
2. **Communication:** To contact respondents for research interviews and follow-up calls.
3. **Incentive Payments:** If we directly pay incentives to respondents, we store bank details for payment processing.

## Sources of Personal Information

We may have obtained personal information about you from various sources including:

- Directly from you, such as when you contact us to request information or when you participate in a research project
- Vendors who provide services on our behalf
- Social networks
- Information that is in the public domain

## Sharing of Personal Information

We may have shared your personal information with certain categories of third parties including:

- Vendors who provide services on our behalf
- Professional organisations such as auditors and law firms
- Internet service providers
- Data analytics providers
- Operating systems and platforms

## Consumer Rights

As a California resident, you have the following rights under the CCPA:

1. **Right to Know:** You can request details about the personal information we have collected, used, and disclosed about you during the past 12 months.
2. **Right to Delete:** You can ask us to delete your personal information (subject to exceptions).
3. **Right to Opt-Out:** You can opt out of the sale of your personal information to third parties.

## Disclosure of Personal Information

We do not share, rent, or sell personal data for direct marketing purposes. However, we may share personal information with pharmaceutical clients sponsoring market research projects.

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For example, if you participate in a group discussion, we may share relevant footage with the sponsoring client.

To ensure the security of your personal information, we may need you to provide additional details for identity verification. The specific information requested will vary based on the type and sensitivity of the data we hold or the nature of your request. If further details are necessary, we will reach out to you before processing your access or deletion request.

## Contact Us

If you have any questions or wish to exercise your CCPA rights, please contact our Compliance Team:

Email: [compliance@beyondblueinsight.com](mailto:compliance@beyondblueinsight.com)

Address: Ministry of Work, 41 New Cross Street, Swinton, Manchester, M27 4TU, UK

## Changes to this Privacy Policy

This policy is regularly reviewed and may be updated at any time. You should revisit this policy each time you consider giving personal data to make sure you are happy with the terms. A summary of the changes since the previous version is included in the **Document Control** section below.

## Document Control

The current version of this Policy, together with its previous versions, shall be recorded below.

Version	Description	
V1.0	Date Live:	2021-06-15
	Version Notes:	Original document
	Approved by:	Lisa Heideman, Research Director
V2.0	Date Live:	2022-05-31
	Version Notes:	Addition of four-part structure for market research participants, clients, recruitment and employees
	Approved by:	Emma Sullivan, Operations Director
V3.0	Date Live:	2023-11-13
	Version Notes:	Compliance manager details updated
	Approved by:	Emma Sullivan, Operations Director
V4.0	Date Live:	2024-09-04
	Version Notes:	California Consumer Privacy Act requirements added and re branded
	Approved by:	Emma Sullivan, Operations Director
V5.0	Date Live:	2025-04-14
	Version Notes:	Added introductory section with company details, data controller role, and contact information. Expanded types of data collected. Detailed methods of data collection. Strengthened sections on data security, data retention, and data subject rights.
	Approved by:	Emma Sullivan, Operations Director

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