



# **Unchosen Code of Conduct**

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# **Privacy Policy**

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## Introduction

Unchosen are committed to protecting and respecting your privacy.

This policy (together with our terms of use and code of conduct) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.unchosen.org.uk](http://www.unchosen.org.uk) you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Unchosen of Easton Business Centre, Felix Road, Bristol BS5 0HE.

Our nominated representative for the purpose of the Act is Dr Júlia Tomás.

## The Principles of Unchosen Code of Conduct

This is the first edition of Unchosen self-regulatory Code of Conduct and was agreed by the Board to be operative from 1 September 2015.

All Unchosen employees (including trustees, volunteers and the board) must comply with this Code.

Unchosen takes steps to ensure that all individuals employed or engaged by the organisation comply with this Code.

The Code of Conduct is designed to support Unchosen's engagement in market, social or opinion research in maintaining professional standards.

The Code is also intended to reassure the general public and other interested parties that research is carried out in a professional and ethical manner.

### Principles

1. Unchosen shall ensure that participation in the organisation's surveys is based on voluntary informed consent.
2. Unchosen shall be straightforward and honest in all our professional relationships.
3. Unchosen shall be transparent as to the subject and purpose of data collection.
4. Unchosen shall respect the confidentiality of information collected.
5. Unchosen shall respect the rights and well-being of all individuals.
6. Unchosen shall ensure that participants are not harmed or adversely affected by our professional activity.
7. Unchosen shall exercise independent professional judgement in the design, conduct and reporting of our professional activities.
8. Unchosen shall protect the reputation and integrity of the organisation.
9. Unchosen shall ensure that research is carried out in a professional and ethical manner.

## Definitions

### Definitions used in Unchosen Code of Conduct and Privacy Policy

**Cookies:** A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

**Data Collection Process:** A data collection process is any process used to obtain information from or about participants. It includes, but is not limited to, interviews, questionnaires, discussion guides, and stimulus materials, as well as passive data collection.

**Direct Marketing:** Direct marketing is communication by whatever means of any advertising or marketing material, directed to particular individuals. This includes material promoting the aims and ideals of not-for-profit organisations.

**Identity:** The identity of a participant includes, as well as their names and/or address, any other information which offers a reasonable likelihood that they can be identified by any person or organisation who has access to the information.

**Incentive:** Any benefit offered to respondents to encourage participation in a project.

**Informed Consent:** Informed consent is a process by which a participant voluntarily confirms his or her willingness to take part in a particular survey, after having been informed of all aspects of the project that are relevant to their decision to participate.

**Interview:** An interview is any form of contact intended to obtain information from a Respondent or group of Respondents. This can involve passive as well as direct contact.

**Monitoring:** Monitoring is the supervising of activities (such as data collection) to ensure that they meet required objectives and performance targets.

**Participant:** A participant is any individual or organisation from or about whom data are collected.

**Research:** Research is the collection, use, or analysis of information about individuals or organisations intended to establish facts, acquire knowledge or reach conclusions.

**Records:** Records includes anything containing information relating to a project and covers all data which form evidence of an event, activity or fact.

**Respondent:** A Respondent is any individual or organisation from or about whom data is collected or is approached for interview.

## Definitions from the Data Protection Act 1998 used in Unchosen Code of Conduct and Privacy Policy

### Personal data

Data which relate to a living individual who can be identified –

- a) from those data, or
- b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller,
- c) and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

### Data Subject

An individual who is subject of personal data.

### Data Controller

A person who (either alone or jointly in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

### Data Processor

Any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

### Processing

Obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including –

- a) organisation, adaptation or alteration of the information or data,
- b) retrieval, consultation or use of the information or data,
- c) disclosure of the information or data by transmission, dissemination or otherwise making available, or
- d) alignment, combination, blocking, erasure or destruction of the information or data.

### Third Party

Any person other than –

- a) the data subject,
- b) the data controller, or
- c) any data processor or other person authorised to process data for the data controller or processor.

## Information we may collect from you

We may collect and process the following data about you:

### Information you give us

You may give us information about you by filling in forms on our site [www.unchosen.org.uk](http://www.unchosen.org.uk) (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you subscribe to our newsletter, search for a product, place an order on our site, enter a competition or survey, download our resources, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and the way you use our resources.

### Information we collect about you

With regard to each of your visits to our site we may automatically collect the following information:

- a) Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- b) Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

### Information we receive from other sources

We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, for example, our funders, sub-contractors in technical, payment and delivery services, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

## Unchosen Code of Conduct

The following rules of the Code are also applicable to the administration of incentives given to the respondents of the survey related to *Films Against Slavery* DVD series:

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### General Rules of Professional Conduct

1. Research is conforming to the national legislation relevant to Unchosen in general and to the Community Activism Award in particular, including the Data Protection Act 1988.
  2. Unchosen acts honestly in dealings with Respondents, employees and the general public.
  3. Unchosen takes reasonable steps to ensure that others (including employees, partner organisations and Respondents) do not breach or cause breach of this Code.
  4. Unchosen does not act in a way which might bring discredit on the profession (i.e. NGOs).
  5. Unchosen takes all reasonable precautions to ensure that Respondents are not harmed or adversely affected by Unchosen survey and monitoring procedures.
  6. Respondents are not misled when being asked for cooperation to participate.
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### Commissioning and Design

7. Unchosen takes reasonable steps to ensure that the rights and responsibilities of itself and its employees, are governed by a written contract and/or internal commissioning document.  
**Comment:** *The Data Protection Act 1998 requires contracts for the processing of personal data to be in writing.*
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### Participant Confidentiality

8. The anonymity of Respondents is preserved unless they have given their informed consent for their details to be revealed or for attributable comments to be passed on.
9. If Respondents have given consent for data to be passed on in a form which allows them to be personally identified, Unchosen must;
  - a) demonstrate that they have taken all reasonable steps to ensure that it will only be used for the purpose for which it was collected; and
  - b) fully inform Respondents as to what will be revealed, to whom and for what purpose.
10. A follow up interview with a Respondent can be carried out only if the Respondents' permission has been obtained when ordering the *Films Against Slavery* DVD series.



11. Any re-contact must match the assurances given to Respondents at the time that permission was gained e.g. when re-contact is to occur, the purpose and by whom.
12. Respondents' details will not be passed on to another third party for research or any other purposes without the prior consent of the Respondent, unless there is a legal obligation to do so.
13. Unchosen ensures that lists containing names and contact details are not used for marketing purposes.

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## Distinguishing Research from Other Purposes

14. Unchosen ensures that research purposes are clearly distinguished from direct marketing.
15. Where an incentive is offered (i.e. The Marsh Award for Raising Awareness about Modern Slavery), Unchosen clearly informs the Respondent about,
  - c) who will administer the incentive;
  - d) what the incentive will be;
  - e) when the participant will receive the incentive; and
  - f) whether any conditions are attached e.g. completion of a questionnaire and accepting a follow-up call by telephone.

**Comment:** *For further information, participants should consult the following Unchosen Regulation for Administering Incentives.*

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## Informed Consent

16. Unchosen ensures that participants give their informed consent where personal data is collected directly from them.
17. Unchosen ensures that it has a fair and lawful basis for the collection of personal data from sources other than the data subject themselves.
18. Unchosen ensures that participants are provided with sufficient information to allow consent to be given. This includes:
  - a) the name of the organisation responsible for data collection (i.e. Unchosen);
  - b) the general subject of the data collection;
  - c) the purpose of the data collection;
  - d) whether the data collection is to be recorded and/or observed;
  - e) the likely length in minutes of the data collection;
  - f) an assurance that the activity is being conducted in accordance with Unchosen Code of Conduct.

**Comment:** *the organisation responsible for data collection is the data controller as defined under the Data Protection Act 1998.*

## Recontacting Participants

19. Unchosen ensures that follow-up contact with a participant is carried out only if the participant's permission has been obtained at the previous point of data collection.
  20. Unchosen ensures that any re-contact matches the assurances given to participants at the time that permission is gained e.g. when re-contact is to occur, the purpose and by whom.
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## Data Collection

21. Unchosen takes reasonable steps to ensure the following:
    - a) that data collection processes are fit for purpose and participants have been advised accordingly;
    - b) that the design and content of data collection processes are appropriate for the audience to be reached;
    - c) that participants are able to provide information in a way that reflects the view they want to express, including don't know / other where appropriate;
    - d) that participants are not led towards a particular point of view;
    - e) that responses are capable of being interpreted in an unambiguous way; and
    - f) that personal data collected are relevant and not excessive.
  22. Unchosen ensures that participants are informed about monitoring (listening and recording) at the beginning of a data collection process.
  23. Unchosen ensures that a participant's right to withdraw from a project (i.e. the Marsh Award for raising Awareness about Modern Slavery) at any stage is respected.
  24. Unchosen ensures that telephone calls will only take place between Monday and Thursday from 9am to 5pm.
  25. Unchosen ensures that participants (including employees) are not required or pressured to participate.
  26. Unchosen ensures that any responses given by participants are deleted if requested by them and if this is reasonable and practicable.
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## Analysis and Reporting of Findings

27. Unchosen ensures that findings disseminated by the organisation are clearly and adequately supported by the data.
28. Unchosen complies with reasonable requests to make available to anyone the information necessary to assess the validity of any published findings.
29. Unchosen ensures that data includes sufficient technical information to enable reasonable assessment of the validity of the results.

30. Unchosen ensures that reports include sufficient information to enable reasonable assessment of the validity of the results.
  31. Unchosen takes reasonable steps to ensure that findings from monitoring, published by the organisation are not incorrectly or misleadingly presented.
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## Disclosure of your information

32. Unchosen may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
  33. Unchosen may share your information with selected third parties including:
    - a) The board and our funders.
    - b) Analytics and search engine providers that assist us in the improvement and optimisation of our site.
    - c) PayPal for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
  34. Unchosen may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Unchosen, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
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## Where we store your personal data

35. The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who works for us. Such staff may be engaged in, among other things, the fulfilment of your order and the processing of your payment details. By submitting your personal data, you agree to this transfer, storing or processing. Unchosen will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.
36. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted [using SSL technology]. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
37. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## Your rights

38. You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data or by not inserting your email or/and phone number. You can also exercise the right at any time by contacting us at [info@unchosen.org.uk](mailto:info@unchosen.org.uk).
  39. Our site may, from time to time, contain links to and from the websites of our partner networks. 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.
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## Access to information

40. The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.
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## Changes to our privacy policy

41. Any changes we may make to our privacy policy in the future will be posted on this document and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

## Analytics Cookies

We use Google Analytics, Twitter Analytics, Facebook Insights, MailChimp Reports and Vimeo Advanced Stats to analyse the use of our website and social networks.

Our analytics service providers generate statistical and other information about website and social networks use by means of cookies.

The information generated relating to our website and social network is used to create reports about the use of our virtual social media.

Our analytics service providers' privacy policies are available at:

- [<http://www.google.com/policies/privacy/>]
- [<https://twitter.com/privacy/>]
- [[www.facebook.com/policy.php/](http://www.facebook.com/policy.php/)]
- [<http://mailchimp.com/legal/privacy/>]
- [<https://vimeo.com/privacy/>]

## Uses made of the information

We use information held about you in the following ways:

**Information you give to us.** We will use this information:

- a) to monitor and evaluate the use and the quality of our products;
- b) to produce reports on our activities to our funders;
- c) to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- d) to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- e) to notify you about changes to our service;

- f) to ensure that content from our site is presented in the most effective manner for you and for your computer.

**Information we collect about you.** We will use this information:

- a) to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- b) to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- c) to allow you to participate in interactive features of our service, when you choose to do so;
- d) as part of our efforts to keep our site safe and secure;
- e) to measure or understand the effectiveness of the resources we serve to you and others;
- f) to improve the resources available to you.

**Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

## The Marsh Award for Raising Awareness about Modern Slavery

Even though there is no specific legislation governing survey incentives, there are common law principles such as transparency, equity and fairness that are incorporated into the administration of free prize draws by those groups who organise them as an incentive for survey participation. These common law principles are implicit in Unchosen Code of Conduct.

### Regulations for Administering Incentives

1. Respondents are not required to do anything other than agree to participate in a market research exercise, fill in a questionnaire and answering to a follow up phone call to be eligible for entry to the Marsh Awards for Raising Awareness about Modern Slavery.
2. Incentives do not require the respondent to spend any money.
3. Respondents are not promised that they will receive gifts or branded material at the end of an interview. This includes Unchosen compilation DVDs, Roadshow events support or any event management support.
4. The use of incentives to stimulate response is not used by Unchosen as a means of collecting respondent's personal details.
5. No respondent's name or identifying details can be passed without the express permission of respondents whose permission is entirely voluntary.

### Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [info@unchosen.org.uk](mailto:info@unchosen.org.uk).