



## **Silverlight Research Privacy Policy**

Silverlight Research Limited (Silverlight), respects your privacy and we are committed to protecting your personal information. This Privacy Policy sets out our personal information collection and sharing practices for our websites and through the other channels described below. Further notices highlighting certain uses we wish to make of your personal information, together with the ability to opt in or out of selected uses may also be provided to you when we collect personal information from you. We take our duty to process your personal information very seriously. Refer to the sections below for more details on how and why we use your information.

Silverlight Research is a expert network company and part of our business activities involve the identification of industry experts and the introduction of them to our clients, for the purposes of consultations and other interactions, to assist our clients in making informed strategic decisions. Joining our network means that Silverlight Research team members may contact Experts with project invitations. Clients of Silverlight Research may browse Experts on our platform and contact Experts directly for project invitations. This Privacy Policy aims to explain our privacy practices including the information of Clients and Experts that work with us.

### **Sources by which we may collect personal data about Clients or Experts**

We may collect personal information about you through a variety of different methods including when you:

- Correspond with us about becoming, or become an Expert
- Correspond with us about becoming, or become a Client
- Ask us for more information
- Send us correspondence via email
- Give us feedback
- Correspond with us by post, telephone, email, SMS, WhatsApp or other electronic means.

We may also gather information about you or your organisation from publicly available information such as:

- Websites
- Social Media Channels
- LinkedIn Profiles
- Companies House

**Website and communication usage** Details of your visits to the websites and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access. This information is collected under the process of Website Hosting, we process this data under legitimate interests. When you are browsing our website we have some essential cookies in use, this makes the website work and ensures the security of the website. You can disable these cookies but it may affect the way the website works for you. We use Google Analytics to keep track of our website traffic, which may use cookies for this purpose. Please refer to Google Analytics' privacy policy for further information. Our cookie policy is at <https://app.privasee.io/privacy-portal/630c81a94d1e7200138468b8>

### **When you correspond with us via email**

When you correspond with us via email, the information in the email will be used to respond to your request or question and we might store data such as your contact details or views and opinions in our CRM to manage our relationship with you. Our legal basis for data protection purposes is legitimate interest.



### When you use the online chat function on our website

Silverlight provides the opportunity to talk with one of our team via online chat (the blue bubble), this transfers your information such as your contact details or views and opinions to one of our team members who will help you with your questions. The details to facilitate working together may be transferred to our system. Our legal basis for data protection purposes is legitimate interest.

### When you use the WhatsApp website chat function

We provide the opportunity to have a WhatsApp chat via a link on our website. This chat is based on the WhatsApp business service and responded to by one of the Silverlight team who is able to answer your questions. To assist you in your request we may need to process data such as your contact details or views and opinions. The details to facilitate working together may be transferred to our system. Our legal basis for data protection purposes is legitimate interest.

### When you agree to work with us

#### Overview

Silverlight is the 'data controller' of the personal information you provide to us. Your relationship with us determines how much information we collect from you. We will only ever collect the information needed to provide you with advice and services. We will be very clear with you about the reason for collecting information and how we intend to use, share and store that information at the point we collect it.

#### Experts

##### When you enquire about or become an Expert

When you enquire with us about becoming an Expert, we will ask you for specific information about your expertise and work experience in order to be able to provide you with potential introduction and consulting opportunities which may be of interest. When you have agreed that you wish Silverlight to consider you for suitable projects we will retain your information on our database, this will include the information you provide and any other relevant publicly available information, for example, information from your LinkedIn profile. Our legal basis for data protection purposes is contractual obligations.

##### Survey information

We may ask you to complete surveys that we will use for research purposes using Zoho survey platform.

##### Information you provide to us

Information you provide to us may include your name, address, telephone numbers, email address(es) and other contact details as well as detailed information in respect of your academic and professional background and employment history (and other information typically contained in a detailed CV/resume).

If you participate in an Engagement through us we will request your bank account details to be able to make payment to you. The legal basis for doing so is Contractual obligations.

##### Other ways we collect information about you

We may use relevant publicly available information which may include your name, academic and professional background and employment history, including the identities of your current and former employers and job titles/positions. This information may be found using search engines, on corporate websites or may be



information which you have made public (such as information you have made available on business networking platforms and social media such as LinkedIn). Our legal basis for data protection purposes is Legitimate Interests.

### Ways we approach Experts to work with us

As well as Experts approaching us to seek suitable projects, we will approach potential Experts who have particular skills, knowledge or experience to work on projects we have been commissioned by a Client to complete. This means we will approach Experts via email, LinkedIn, or occasionally via a phone call. We will always ask if you want to receive further information about opportunities and you can ask us not to contact you at any time. Our legal basis for data protection purposes is legitimate Interests.

### Monitoring of certain activities

We may monitor certain activities such as calls and transactions to ensure service quality, compliance with procedures and to combat fraud. Our legal basis for doing so is legitimate interests (to ensure the quality and legality of our services).

### How we correspond with Experts

Most of the time we will contact you, using your business contact information. However, we understand that Experts may wish to receive information from us via their personal email address or mobile number. We are happy to make sure that we contact you via the easiest method for you, so just let our team know which is the best contact information for you and we'll update our records. If your contact information changes, please let us know so we can amend our records. As an Expert if you do not wish to hear about other opportunities from us, just let us know and we'll amend our records accordingly.

## **Clients**

### When you enquire about or become a Client

When you enquire with us about becoming a Client we will retain a record of the communication for a period of 12 months. When you become a Client and enter into a contract for services with us, we need to retain your accounts information for a period of seven years in accordance with UK accounting regulations. Throughout your engagement with Silverlight we will retain notes and records of the services requested and provided. Our legal basis for data protection purposes is Contractual obligations.

### Service provision data

If you are a Client (or a prospective client), we may collect personal data on you in the ordinary course of our business relationship with you ie the provision of our services to you. This includes carrying out our obligations arising from any agreements entered into between you and us, such as identifying the most suitable Experts for Engagements with you and identifying other products and services which may be of interest to you. Our legal basis is contract performance.

### For research and development purposes

We may analyse usage and interaction in order to better understand you and your service requirements which will help us develop our products and services. We do this through the use of cookies <https://app.privasee.io/privacy-portal/630c81a94d1e7200138468b8> and on the basis of consent.

### To provide you with marketing materials



To provide you with updates, where you have chosen to receive these. We may also use your contact details, personal characteristics to market our products and services to you by email, phone and other electronic means. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by contacting us as set out below. The legal basis is legitimate interest.

### To inform you of changes

We may use your contact details to notify you about changes to our services and products. Legal basis is legitimate interests.

### Financial Arrangements

Silverlight will take action to recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action (including the commencement and carrying out of legal and court proceedings). Our legal basis is contractual obligations.

### Where do we store and protect information

Wherever possible, all the personal information we process is processed within the UK or the European Economic Area (EEA). Some of our third-party service providers, are based outside the UK or EEA so their processing of your personal information will involve a transfer outside the UK or EEA.

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information. Whenever we transfer your personal information outside of the UK or EEA, we do our best to make sure a similar degree of security of personal information is provided by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal information the same protection it has in Europe.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

### Sharing information

If you have joined our Network as an Expert, Silverlight Research will share your profile information (name, current job title and company, former job titles and companies work at, and LinkedIn profile url) with our Clients through our expert network platform for purposes of matching you with potentially relevant projects. If you are an Expert registered on our platform and you also give consent for your contact details (email/telephone) to be shared with Silverlight Clients, Clients will have access to also browse your contact details on our platform, and Clients may contact you as an Expert directly via email, Whatsapp, SMS or telephone, in order to invite you to relevant projects. You can change the way Clients can contact you to discuss projects at any time by updating your preferences at <https://www.silverlightexperts.com/expert-project-invitation-preferences.html>.



Other than as detailed above, we do not share your information with any other organisations or individuals unless we are obliged to by law, for purposes of national security, taxation and criminal investigations and in the following instances:

- If you have agreed that we may do so
- If we sell the business – the new shareholders may obtain Expert or past Client information. This information would only be used for the same purposes for which it was originally obtained.
- If we run an event in partnership with other named organisations, your details may need to be shared. We will be very clear what will happen to your personal information when you register.

### **Retaining your information**

We hold your information only as long as necessary for the processing purpose(s) for which they were collected and any other permitted linked purpose. For example, your transaction information when you have been a Client will be held for up to seven years for accounting purposes. During the retention period we ensure the security and integrity of the information. We restrict access to your personal information to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs and your information that is no longer needed is either anonymised (and the anonymised information may be retained) or securely destroyed.

### **Your rights**

Silverlight Research Ltd takes the protection of personal data seriously. You have the right to ask us not to process your personal information for marketing purposes. You can exercise your right at any time by contacting us at [compliance@silverlightgroup.com](mailto:compliance@silverlightgroup.com)

You have a number of rights about how the personal information you provide can be used. These are:

- Transparency over how we use your personal information (right to be informed).
- The ability to request a copy of the information we hold about you, which will be provided to you within one month (right of access).
- Update or amend the information we hold about you if it is wrong (right of rectification).
- Ask us to stop using your information (right to restrict processing).
- Ask us to remove your personal information from our records (right to be 'forgotten').
- Object to the processing of your information for marketing purposes (right to object).
- Obtain and reuse your personal information for your own purposes (right to data portability).
- Not be subject to a decision when it is based on automated processing (automated decision making and profiling).

If you wish to exercise any of these rights please write to [compliance@silverlightgroup.com](mailto:compliance@silverlightgroup.com). If you wish to raise a complaint about how we have handled your personal information you can contact us and we will investigate the matter. If you are not satisfied with our response or believe we are not processing your personal information in accordance with the law, you may report this to the Information Commissioner's Office (ICO).

If you would like to know more about your rights under data protection law, you can find out more at the Information Commissioner's Office website.

### **How to contact us if you are based in the EU**

Silverlight processes the personal data of individuals in the European Union and European Economic Area, in either the role of 'data controller' or 'data processor', and has appointed DataRep as its Data Protection Representative for the purposes of GDPR and you can contact them directly in your home country.



If Silverlight has processed or is processing your personal data, you may be entitled to exercise your rights under GDPR in respect of that personal data.

If you would like to raise a question to Silverlight, or otherwise exercise your rights in respect of your personal data, you may do so by:

- Sending an email to DataRep at [datarequest@datarep.com](mailto:datarequest@datarep.com) quoting 'Silverlight Research Ltd' in the subject line, or
- contacting DataRep via the online webform at [www.datarep.com/data-request](http://www.datarep.com/data-request)

### **How to contact us**

If you wish to talk through anything in our privacy policy, find out more about your rights or obtain a copy of the information we hold about you, please contact us by emailing [compliance@silverlightgroup.com](mailto:compliance@silverlightgroup.com) and we will be happy to help.

### **About Us**

Silverlight Research is registered with the UK's Information Commissioner's Office as a Data Controller. Our registration number is ZA760718.

Silverlight Research Limited is a company registered in England and Wales. Registered company number: 11124869 whose registered office is 52 Grosvenor Gardens, London, SW1W 0AU, England.

### **Data Protection Officer**

Contact details of the data protection officer

The designated data protection officer is:

DataCo International UK Limited  
c/o One Peak Partners, 41 Great Pulteney Street, 2nd floor, London W1F 9NZ, United Kingdom  
+44 20 3318 1718  
[www.dataguard.co.uk](http://www.dataguard.co.uk)

### **Changes to this Privacy Policy**

We may change the content of our websites and how we use cookies without notice, and consequently our Privacy Policy may change from time to time in the future. We therefore encourage you to review when you visit the website from time to time to stay informed of how we are using personal information, you will be able to see if changes have been made by the date it was last updated at the end of the document.

Last updated: August 2022