

Privacy Notice for 'Food Information to Consumers' Defra Research



Important details about Winning Moves

Established in 1995, Winning Moves Ltd undertakes research and evaluation for government, publicly funded and other organisations. We primarily operate as a Data Processor – however, on occasion, we may operate as Data Controller (either singularly or joint) depending on the nature of our work.

- Company number | 03069806
- Address | Winning Moves, 102 Colmore Row, Birmingham, B3 3AG, England
- Phone | 0121 285 3800
- Email | info@winningmoves.com
- Information Commissioner Office Registration no | Z6399957

Our commitment to your privacy

Winning Moves Ltd takes your privacy very seriously and we are committed to protecting your personal information and the information you provide whilst conducting research with us. Please read this Privacy Notice carefully and contact us with any questions.

We are committed to meeting relevant laws, codes, registrations and standards



The UK General Data Protection Regulation (GDPR)



Data Protection Act 2018



Market Research Society (MRS) Code of Conduct



ISO20252:2019 – the International Quality Standard for Market, Opinion and Social Research



Information Commissioner Office Registration no | Z6399957



Cyber Essentials

As a Market Research Society Company Partner, you can trust that your personal information will be treated with respect, and it will only be used for the purposes that we inform you about. It is not our aim to sell or promote anything. We conduct market research using scientific methods and we commit, in obtaining your co-operation, not to mislead you about the nature of the research or how the findings will be used. You can verify that we are a bona fide market research consultancy by contacting the Market Research Society (MRS) on freephone 0500 396 999.

Background

The Department for Environment, Food and Rural Affairs (Defra) wants to assess the impact of food labelling regulations on the food and drink industry. To do this, Defra has commissioned Winning Moves, alongside WRAP (Waste and Resources Action Programme), Icaro and City University to undertake its 'Food Information to Consumers (FIC)' research project. This will seek to explore how food manufacturers and food retailers are dealing with these regulations overall, as well as the effect of more recent changes in food labelling legislation. Winning Moves is conducting a telephone survey with food businesses to inform this assessment. Participation is voluntary.

Data controller and data processors

For the purposes of this project:

1. Defra is the data controller
2. Winning Moves is a data processor
3. WRAP is also a data processor

Type of data that will be processed

For this project, we will process the following types of personal data:

1. *Simple* data including your name, email address, age, organisation name, telephone number.
2. *Behavioural* data including your food labelling related experiences, opinions, activities (that could lead to profiling) and information.
3. *Financial* data including your turnover and compliance costs.

How we get the personal data we process

Most of your personal information is provided through the following ways:

- 🌀 Your contact details were obtained from a commercial database provider (Dun & Bradstreet).
- 🌀 Via interviewing e.g. through responding to this survey that you are being invited to participate in.

The legal basis for processing your personal data

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

1. *Consent* is the legal basis for which we will process additional personal data provided through interviewing.
2. We will use *legitimate interest* as the legal basis for sharing the business name and name of the respondent from any large food retail business (only) that declines to take part in an interview with us where we do not have an opportunity to obtain consent about data sharing.

How we will use your personal data

- 🌀 For market and social research purposes: this includes carrying out analysis and producing reports on behalf of the client who has commissioned the survey.
- 🌀 For quality control purposes: we may telephone you to validate your responses.
- 🌀 Provided you have given consent, for Winning Moves or one of our research partners to recontact you about follow-up research.

- Results will be reported back to our client in an anonymised and aggregated format. The overall findings from these results will be published.
- The personal data you provide will not be used for automated decision making (making a decision by automated means without any human involvement) nor profiling (automated processing of personal data to evaluate certain things about an individual).

Will we share your personal data?

Your personal data will be shared with the following third parties:

- Defra*, the client and Data Controller. We will securely share a list of business names with Defra who have been spoken to and invited to participate and those who completed the survey. Where possible they will be removed from future contact lists to prevent you being contacted again for this purpose or similar research in the near future. Defra will also receive an anonymised dataset of survey responses. This means that the responses provided to us during the survey will be shared with Defra, but that Defra will not know who has provided which response.
- WRAP, a Data Processor and part of the research consortium. Under the lawful basis of 'consent', we will securely share with WRAP personal data (business name and contact details) of any large retail businesses (only) who consents to this. Consenting organisations may be contacted to take part in other aspects of this research project.
- Separately, under the lawful basis of 'legitimate interest', Winning Moves will securely share with WRAP the name of any large food retail business and contact name that declines to take part in an interview with us, and we have not had an opportunity to ask their consent to share. This is to ensure that WRAP can be sensitive to this if they then contact that business as part of its role in the research project.
- WRAP will also receive an anonymised dataset of all survey responses. This means that the responses provided to us during the survey will be shared with WRAP, but that WRAP will not know who has provided which response.
- CYMEN*, a Welsh transcription service so that we can administer surveys in Welsh and translate them back into English accurately (if you opt to conduct the interview in the Welsh language).

Any third party must also process the personal information as set out in this Privacy Policy and as permitted by the UK's Data Protection Act/laws.

How we will keep your personal data

Your information will be securely stored. We will protect the confidentiality of your information in accordance with our normal data handling procedures and all legal requirements. We will not use it for any purposes other than those which are set out in this Notice. We are committed to keeping personal data secure and take all reasonable technical and organisational measures to protect personal data from loss, misuse or alteration.

The length of time we hold your personal information varies depending upon the type of information and its use. We will hold your personal information on our systems only for as long as necessary to provide research services to our clients, and will anonymise data where possible, securely deleting personal data associated with it at the earliest possible point. For this project, we intend to retain your personal information for 6 months after completion of the project (we expect this to be July 31st, 2024). Your personal details will be removed from your survey responses and stored securely and separately. We will then dispose your information by secure digital deletion.

Where your personal data will be processed

Your data will not be transferred or stored outside the UK or European Economic Area.

Use of automated decision-making or profiling

The personal data you provide is not used for:

⚡ automated decision making (making a decision by automated means without any human involvement)

⚡ profiling (automated processing of personal data to evaluate certain things about an individual)

Your Rights

Co-operation in research is voluntary at all times regardless of what the research is about or who our client is. You are entitled at any stage to ask that your personal data, or part or all of the record of your survey responses, be destroyed or deleted and we will carry out such a request. This can be requested during the interview itself or afterwards. However, after the results are published, we will not be able to remove your survey results. You have the right to access any personal data that we process relating to you. We may ask for verification of your identity before releasing any information to you.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us:

Phone	Email	Address
0121 285 3800	dataprotection@winningmoves.com	Winning Moves 102 Colmore Row Birmingham B3 3AG

You can also complain to the ICO if you are unhappy with how we have used your data:

Phone	Website	Address
0303 123 1113	https://www.ico.org.uk	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF