

# Privacy Policy

Our privacy notice refers to our commitment to treat information about our contractors, shoppers, customers and suppliers with the utmost care and confidentiality.

This privacy notice sets out how we collect, use, share and keep about you and how we protect your personal information and your rights in relation to your information.

Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

This policy may change from time to time so please check back here frequently

We collect information about you from the day you sign-up as a Mystery Shopper, become a Prospect, Client, Supplier or Administrator. The lawful basis for collecting this information is for 'Legitimate Interests'.

CX Evolution, of East Yorkshire, United Kingdom is the Data Controller for the purposes of the General Data Protection Regulation (GDPR) (EU) 2016/679 (GDPR) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and any successor legislation to the GDPR or the Data Protection Act 1998. You can contact us by emailing [info@cx-evo.com](mailto:info@cx-evo.com)

## Data Protection Principles

Whenever collecting information about people, CX Evolution agree to apply the eight data protection principles:

1. Personal data should be processed fairly and lawfully
2. Personal data should be obtained only for the purpose specified
3. Data should be adequate, relevant and not excessive for the purposes required
4. Data should be accurate and kept up-to-date
5. Data should not be kept for longer than is necessary for purpose
6. Data processed in accordance with the rights of data subjects under this act
7. Security: appropriate technical and organisational measures should be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

# Mystery Shoppers

<p>What do we collect?</p>	<p>The personal information you give us during your registration via our web site may include your first and last name, address, e-mail address and phone number, date of birth, age.</p> <p>Pay claims – name, address and bank account information During registration, we will capture IP address.</p> <p>Following registration, you will be issued with a username (or ‘Unique ID’) and will have opportunity to provide us with additional information.</p> <p>If you contact us by mail, email, web or phone, we may keep a record of that correspondence.</p>
<p>How is it used?</p>	<p>When you apply to register with us as a mystery shopper or auditor, we may use information we collect from you to: consider your suitability to perform those services;</p> <ul style="list-style-type: none"> <li>• include you on our list of mystery shoppers;</li> <li>• manage your account;</li> <li>• collect and maintain historical information about your mystery shopping assignments and payments and administer payments;</li> <li>• carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;</li> <li>• provide you with information about shopping opportunities and other services we offer that are similar to those that you have already enquired about;</li> </ul>
<p>Why do we use it?</p>	<p>With the exception of IP address, processing is necessary for the performance of the independent contractor agreement that exists between us, or in order to take steps at your request prior to entering into a contract.</p> <p>The processing of IP address is necessary for the purposes of the legitimate interests pursued by us, specifically for the purposes of security and fraud prevention.</p>
<p>Who has access to it?</p>	<p>Your profile is available to our Administrators and Directors with a legitimate business need.</p> <p>Banking information (sort code and account number) are provided to our bank for the purposes of making payments in accordance with the contract that exists between us, although no other identifiable information is disclosed.</p> <p>Our accountants have your name in order to process our Management Accounts and is a Data Controller in their own right.</p>
<p>Retention</p>	<p>We will retain your Personal Data indefinitely whilst you are actively completing mystery shopping assignments for us. When you stop completing mystery shopping assignments, we will retain some restricted Personal Data in order to respond to any requests, support or defend any claims, and provide evidence of financial transactions in accordance with statutory retention periods.</p>

## Prospects

<p>What do we collect?</p>	<p>When you contact us to schedule a briefing, we collect and maintain Personal Data so we can include you in our marketing database, comply with your request, and send you information on our products and services. Personal data we collect for these purposes usually include your name and contact information. Where you contact us by phone, we may also keep a copy of that correspondence.</p> <p>You may unsubscribe from our emails at any time by replying to the email from us and typing “unsubscribe” in the header.</p>
<p>How is it used?</p>	<p>We may use information we collect from you to:</p> <ul style="list-style-type: none"><li>• provide you with the information requested;</li><li>• provide you with information that are similar to those that you have already enquired about;</li><li>• notify you about changes to our service</li></ul>
<p>Why do we use it?</p>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Further direct marketing is necessary for the purposes of the legitimate business interests followed by us.</p>
<p>Who has access to it?</p>	<p>Your full prospect profile is available to our Directors with a legitimate business need.</p> <p>Your full prospect profile is stored on our email and computer for the purposes of maintaining contact with you.</p>
<p>Retention</p>	<p>We will retain your Personal Data for as long as necessary to provide you with the information requested or with information similar to those that you have already enquired about, or until you opt out of receiving marketing communications.</p>

## Clients

<p>What do we collect?</p>	<p>We use your name, telephone number and email address in order to provide you with services</p>
<p>How is it used?</p>	<p>We use the information provided to us to:</p> <ul style="list-style-type: none"> <li>• manage your account;</li> <li>• carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;</li> <li>• notify you about changes to our service</li> </ul>
<p>Why do we use it?</p>	<p>Processing is necessary for the implementation of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p>
<p>Who has access to it?</p>	<p>Your client profile is available to our Administrators and Directors with a legitimate business need.</p> <p>We may share your information with credit reference agencies and other companies for use in credit decisions, for fraud prevention and to pursue debtors.</p> <p>Your profile is stored on servers provided by our third party provider and is stored outside the EEA, in America.</p> <p>Our accountants have your name in order to process our Management Accounts and is a Data Controller in their own right.</p>
<p>Retention</p>	<p>We will retain your Personal Data indefinitely whilst you are accessing any of the services accessible through our reporting platform or as agreed with the our client. When you stop accessing services, we will retain some restricted personal data for a period of time to allow you to download any client data.</p>

## Administrators

<p>What do we collect?</p>	<p>The personal information you give us when you sign-up to be an administrator and to have access to our on-line system, This may include your first and last name, address, e-mail address and phone number, date of birth, age.</p> <p>Pay claims – name, address and bank account information We will capture IP address.</p> <p>Once you have become an administrator, you will be issued with a username (or ‘Shopper ID’) and password. If you contact us by mail, email, web or phone, we may keep a record of that correspondence.</p>
<p>How is it used?</p>	<p>When you apply to become an administrator, we may use information we collect from you to:</p> <ul style="list-style-type: none"> <li>• consider your suitability to perform those services;</li> <li>• collect and maintain historical information about your quality control, allocating assignments and payments and administer payments;</li> <li>• carry out our obligations arising from any contracts entered between you and us and to provide you with the information and services that you request from us;</li> </ul>
<p>Why do we use it?</p>	<p>With the exception of IP address, processing is necessary for us to be able to pay you for the work you undertake.</p> <p>The processing of IP address is necessary for the purposes of the legitimate interests pursued by us, specifically for the purposes of security and fraud prevention.</p>
<p>Who has access to it?</p>	<p>Your profile is available to our Director with a legitimate business need.</p> <p>Banking information (sort code and account number) are provided to our bank for the purposes of making payments in accordance with the contract that exists between us, although no other identifiable information is disclosed.</p> <p>Our accountants have your name in order to process our Management Accounts and is a Data Controller in their own right.</p>
<p>Retention</p>	<p>We will retain your Personal Data indefinitely whilst you are actively working for us. When you stop working for us we will retain some restricted Personal Data in order to respond to any requests, support or defend any claims, and provide evidence of financial transactions in accordance with statutory retention periods.</p>

## Cookies

Our site and affiliated site/s (site/s) use cookies to distinguish you from other users of our sites. This helps us to provide you with a good experience when you browse our website and allows us to improve our sites.

Cookies are small anonymous text files that are placed on your computer by websites you visit. To find out more about cookies visit [www.aboutcookies.org](http://www.aboutcookies.org) We use cookies for the following:

- Session cookies - our shopper and client secure sites use session cookies which your computer stores only for that browsing session, once you close your browser, the cookie is deleted. These cookies allow users to navigate around the site using your logon details without having to login again on every page; and
- Analytics - These cookies measure anonymous statistics about website visitors, such as the number of visitors and pages accessed, allowing us to provide the most beneficial and appropriate content.
- Technology - Some technologies we use automatically store cookies on your machine as part of their operation. These cookies are essential to those technologies, but do not gather or store any personal information.

## Security

Where we store your personal data

The hosting facilities for our site/s are situated in the United States.

All information you provide to us is stored on their secure servers. 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. Please keep your password safe by not sharing with anyone.

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.

Also, ensure that when using features such as social networking, chat room or forums, you do not submit any Personal Data that you do not want to be seen, collected or used by other users.

## Social Media Features

Our Sites includes features from social media websites, such as the Facebook Like button. These features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our Site. This privacy policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing those features.

## Your Rights

Under GDPR you have certain rights in relation to the Personal Data we process. These rights are as follows:

- Right to be informed
- Right to access – unless access is subject to a legal exception.
- Right to rectification
- Right to erasure - if the data is no longer necessary or required in relation to the purposes and there are no other overriding legitimate grounds for us to continue processing it;
- Right to restrict processing
- Right to data portability
- Right to object

You can request to see the information we hold on you. The Company has 40 days to respond to a request. This is known as a 'subject access request'. Contact [info@cx-evo.com](mailto:info@cx-evo.com) for access to your data, if you want to know longer be a mystery shopper. As a Mystery Shopper you can rectify your details by signing in to your account,

Access requests are free however we reserve the right to charge a reasonable fee to comply with requests when such request is unfounded or excessive.

## Complaints

If you have a complaint regarding this privacy policy or how your data is being held, used or processed, you should first contact our Managing Director, whose contact details appear below:

Attention: Managing Director  
[info@cx-evo.com](mailto:info@cx-evo.com)

In the event you are still concerned that CX Evolution is not complying with their obligations under the GDPR and is not handling their data responsibly and in line with good practice, then you may raise a concern with the UK Information Commissioner's Office. The ICO can report a concern online here, <https://ico.org.uk/concerns/handling/> or by phone on 0303 123 1113.

Our legal status under UK data protection law is that of a data controller, and we have notified the Information Commissioner's Office in accordance with the GDPR with registration number ZA680059

## Changes to privacy policy

Any changes we may make to our privacy policy in future will be posted on this page. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the Services.