

React CX Privacy Policy

Here at **React CX**, we value highly our relationships with our clients and shoppers. That is why we want to be completely transparent about why we need the personal information we request when you sign up with us, and how we will use it.

We are fully committed to protecting your information and using it responsibly. Please read our privacy policy below to understand how we collect, use and store your information.

Our privacy policy is fully compliant with **GDPR** (General Data Protection Regulation) which is intended to strengthen and unify data protection for all individuals within the EU.

For more information on GDPR, please access the following links:

<https://www.eugdpr.org/>

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

If you have any questions about this privacy policy and how we use your information, you can contact us at:

React CX

15 Gosditch Street

Cirencester

Gloucestershire

GL7 2AG

Tel: 01285 644144

Email: hello@reactcx.com

Why do we use your information?

As a Mystery Shopping company, **React CX** serve as both a data controller and a data processor. Our purpose is to provide mystery shoppers for our clients. We act as a data controller with regards to our own shopper's and employee's data, and we act as a data processor for our clients. We will only use your information where we have a legal basis to do so and will always respect your rights. Where we do use your information, this will be because you have consented to us doing so or because we have a legitimate interest to use it. When we use your information with consent, it is done so in a way that is unobtrusive and respects your rights. Other reasons may include using information because we have a legal obligation to do so or because we have to fulfil contractual obligations. Your information will never be used without your permission, and you will have a right to withdraw your information from our records should you wish.

Information on Mystery Shoppers

We only access shopper information where it is provided voluntarily by the shopper, often to help us match them to suitable assignments. We treat all information we hold as highly confidential and private, as this information is not shared with our clients. We only have access to information that is necessary and where consent has been given. Shopper details are password protected, and only the shoppers can set these. Mystery Shoppers are able to log into and access their personal information whenever they want, and can amend or delete this information if they wish.

Information on clients, organisations and projects

We treat all information held about clients and client projects as highly confidential; this is supported by our data sharing agreements. Our clients are aware of our privacy policy and **GDPR** compliance, and have been notified of the responsibilities at their end. Where data on client's colleagues is used in our reports, this is done so with the consent of our client's on behalf of their colleagues. We restrict the number of people who have access to client data to a bare minimum, and clients set their own passwords. The only details that are shared with our mystery shoppers are project briefs, questionnaires and locations for set assignments; this is only shared with the carefully selected shopper for each visit.

What information do we collect and how do we collect it?

Shoppers are asked to complete an extended shopper profile before they can sign up to complete any mystery shops. Within this profile, shoppers are asked to provide basic personal data, such as date of birth and gender, in order for our shoppers to be matched with appropriate assignments. Shoppers also provide bank details for payroll purposes, but these are password protected with passwords set by the shoppers. Contact details for the shoppers (phone and email) are also requested, with consent given to contact them via these means.

Clients provide us with contact emails, phone numbers, and information on their employees. They are instructed to ask permission from their colleagues and employees before sharing any of this information with us. Client information is requested and collected at the beginning of project phases, and is regularly updated.

How do we use your information?

Data for shoppers and clients is collected and stored on Sassie, our external results system.

We will only use your information when necessary to carry out assignments, and only when consent has been given. This can include:

- Responding to and fulfilling any requests, complaints or queries you make to us.
- Providing you with information about assignments, projects and available work.
- Allocating jobs.
- Contacting you by phone or email with regards to a query we have about the work you are doing for us.
- Reviewing information given about an assignment (such as verifying locations, times etc)
- Informing you about updates to accounts, projects, policies etc.
- Providing ratings, reports and analysis to clients.

Keeping your details up to date

We will periodically request that you update your details in our system, or confirm that the information we have for you is still accurate. Please let us know if you make any changes to your details in the meantime by contacting us. Data will be deleted as appropriate.

Sharing your information

React CX have put into place data sharing agreements. These serve as a two-way agreement between ourselves and the clients.

We will never share your information with third party organisations, unless required by law to do so. Information about shoppers may be shared with clients, and vice versa, but only where consent has been given and where deemed necessary by both parties. This may include sharing information for

samples and collated reports. When information is shared, it will be only the necessary, basic information; no sensitive personal information will be shared.

How long do we keep your information?

Currently, **React CX** will hold your data until you ask for it to be removed if you are an active shopper. Shoppers who have been inactive for over two years will be removed from our system.

Your rights

Under the General Data Protection Regulations (**GDPR**) you have the following rights:

1. **The right to be informed** – the right to receive privacy information and information on how we process your personal data.
2. **The right of access** – the right to know that we are processing the personal data you have provided to us and, in most cases, the right to ask for a copy of the data we hold.
3. **The right to rectification** – the right to request that we correct inaccurate data or complete incomplete data that we hold for you.
4. **The right to erasure** – also known as the right to be forgotten. You have the right to request that we erase all data we hold for you.
5. **The right to restrict processing** – you have the right to restrict the way we process your data in certain circumstances, e.g. if you contest the accuracy of any data, if our processing is unlawful etc.
6. **The right to data portability** – you have the right to receive a copy of certain personal data or to have it transferred elsewhere in some circumstances.
7. **The right to object** – you have the right to object to us processing your data under certain circumstances.
8. **Rights in relation to automated decision making and profiling** – automated decision making will not be used unless absolutely necessary.

How we keep your information secure on our software

We take appropriate measures to ensure the confidentiality, integrity and availability of systems. Most of our data at **React CX** is held on our online system, **SASSIE**, who have taken detailed measures to ensure their system is as safe as possible.

SASSIE servers are held in Ireland, and these are certified through **Privacy Shield** which helps ensure that **GDPR** standards are met. Passwords are handled securely, and shoppers can be deleted entirely, or partially, depending on individual requests. Shopper profile pages are being adapted to include checkboxes for shoppers to complete, showing that they agree to privacy policies for both **React CX** and **SASSIE**. Shopper profile questions will only cover fundamentally crucial information needed for assignment; other sensitive personal information will be removed. All connections to the platform are https, meaning they are 'encrypted in transit'. All stored information is encrypted. Monthly security scans are performed, and issues are addressed immediately.

If we have a breach of data, or a suspected breach, we will notify everyone as soon as possible (within 72 hours).

Email communication

Where possible, **React CX** will email shoppers and clients via **SASSIE** to ensure they are encrypted and secure. However, it is not always possible to email from within the system, for example if we are emailing in response to an email sent directly to one of our employees. Where emails are sent from colleagues to shoppers and clients, we cannot encrypt these emails. There is always a slight chance that email communication can be intercepted, so we cannot guarantee that these are fully secure.

Complaints

If you have any complaints about how we handle your personal data, please contact us so we can resolve the issue, where possible.

Changes to the Privacy Policy

We may update this policy to reflect changes in how we use this information. When the policy is updated, you will be asked to agree to it again to ensure full transparency.