



# Privacy Policy

October 2022

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# Definitions

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In this policy, the following terms are used:

"CCS Insight": Clickchart Ltd, trading as CCS Insight, a company registered in England and Wales, number 04551070, at The Oakley, Kidderminster Road, Droitwich, WR9 9AY.

"Employees": board members, employees and associates employed on a contractual basis.

"Customers" and "clients": companies and individuals with a commercial agreement with CCS Insight to receive research and advisory services, or other services detailed in an agreement.

"General Data Protection Regulation" and "GDPR": Regulation (EU) 2016/679 of the European Commission.

"Personally identifiable data": data relating to an identified or identifiable person as defined in Article 26 of the GDPR.

"Data subject": a natural person as defined in Article 26 of the GDPR.

# Background

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## CCS Insight

CCS Insight is a research and advisory company specialising in current and future trends in technology. It produces syndicated and custom reports, presentations, data and advice.

Within a given client company, CCS Insight's services are usually available to any employee of that company or its authorised agents. Products are usually not restricted to named individuals, and there is usually no limit on the number of employees within a client organisation who can access CCS Insight's products, subject to the terms of each contract.

CCS Insight provides its products in electronic and occasionally in printed form. The company e-mails electronic versions, usually in PDF or Microsoft Office file formats, directly to employees within a client organisation; it also makes products available on a website, [my.ccsinsight.com](http://my.ccsinsight.com).

Access to reports and other documents on the site is controlled by individual password-protected logins. Users of the site can see the titles and summaries of most items, but access to the full report is restricted according to the terms of the customer's contract with CCS Insight.

Depending on a client's contract, its employees may be able to contact CCS Insight's analysts by e-mail or telephone and ask questions about research topics. Responses are generally delivered by e-mail.

CCS Insight organises several events, including an annual event in London to present its predictions for the technology industry in the years ahead. Tickets are sold as part of an existing subscription service, or to interested individuals, companies and their guests. As far as practically possible, tickets are allocated to a named individual at a particular company and associated with an e-mail address.

Other events include briefings on a specific topic, round-table meetings and marketing support presentations. For these events, places are usually allocated to named individuals and associated with an e-mail address.

## Processing Activities

In the course of running its business, CCS Insight may collect and process information about its clients, prospective clients, employees and members of the public, such as enquirers and correspondents.

The use of personally identifiable data is regulated by the General Data Protection Regulation and other laws. This policy sets out how CCS Insight intends to comply with the key rules that apply to the processing of personally identifiable data in the UK.

**Websites.** CCS Insight's website at [www.ccsinsight.com](http://www.ccsinsight.com) uses small amounts of data stored within a browser ("cookies") to track usage and perform functions such as identity verification and site navigation. The company may from time to time use this information with Google Analytics to determine how visitors use the site. All information is used at an aggregate level; that is, CCS Insight does not monitor individual users or their behaviour. If users do not wish to participate in these activities, they can set their browser to not store cookies. CCS Insight reserves the right to identify and process individual usage if it believes a site visitor is contravening the site's acceptable usage policy.

CCS Insight's website at [my.ccsinsight.com](http://my.ccsinsight.com) uses platform capabilities to track individual usage on the site, including, but not limited to, pages visited, actions performed, length of time spent, search activities and search terms. CCS Insight uses this data to improve its research content and for marketing purposes.

CCS Insight regularly processes the following categories of personally identifiable data:

**Clients.** CCS Insight holds personally identifiable data relating to employees of its client companies, including name, e-mail address, job title and other contact details. CCS Insight processes this data to fulfil its contractual obligation to provide research and advisory services to the client company and its employees. It also processes such data to inform clients of changes to services and new services that may become available. Data is used to verify the identity of employees at client companies accessing CCS Insight services; for example, logins to [my.ccsinsight.com](http://my.ccsinsight.com).

**Prospective clients.** CCS Insight holds personally identifiable data relating to employees at companies that wish to become clients, or that CCS Insight has identified as prospective clients. The data is processed to enable communication with prospective clients before a contract is signed.

**The public.** CCS Insight holds personally identifiable data, in the form of IP addresses, names, e-mail addresses and other contact details as part of its activities in running websites and answering enquiries from the public. Data is used for correspondence purposes and to maintain the security and continued operation of its websites.

**Employees.** CCS Insight holds data about its employees' employment history, education and qualifications; it also holds details of medical and health information, banking details and a record of employees' performance and activities during their employment. It processes this data for ordinary staff administration purposes, including payment of salary, expenses and benefits, conducting appraisals, training and management. CCS Insight also collects personally identifiable data about candidates applying for job vacancies.

**Suppliers.** CCS Insight holds data about its suppliers, including name, e-mail address, job title and other contact details, as well as financial information. It processes such information in order to purchase goods and services, to pay suppliers and maintain its accounts and records.

This policy does not seek to document every instance of personally identifiable data processed by CCS Insight. It focusses on the majority of information processed by the company during its regular business. Should other areas arise in practice not covered by this policy, CCS Insight will consider them separately. The company will review this policy annually and amend it from time to time.

## Applicable Data Protection Law

Data protection law in England Wales is primarily found in the Data Protection Act 1998. This will be superseded by the General Data Protection Regulation from 25 May 2018. The GDPR will be supplemented by the Data Protection Act 2017.

Data protection legislation is enforced by the Information Commissioner, operating through the Information Commissioner's Office (ICO). The ICO has a range of powers, including the ability to issue fines for noncompliance with applicable legislation. Under the GDPR, the ICO will be able to issue fines of up to 4 percent of annual revenue or €20 million, whichever is greater, and to conduct compulsory audits of organisations' data-handling practices.

# Data Protection Principles

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CCS Insight will strive to uphold the following principles when collecting, holding and processing personally identifiable data.

## Fairness

Organisations generally cannot process data in ways that an individual would not have reasonably expected. Collecting data on the pretext of one purpose and then using it for another unrelated purpose is unlikely to be regarded as fair. CCS Insight will at all times consider whether its uses of personally identifiable data would fall with those individuals' reasonable expectations of how that data would be treated.

## Transparency

When processing data, CCS Insight must inform individuals of the company's identity, the purposes for which data is being processed and any third-party recipients of the data. This policy, and its placement on CCS Insight's website, is intended to form part of the company's adherence to transparency.

## Lawfulness

Organisations must establish lawful grounds for processing personally identifiable data. CCS Insight will ensure that its data activities are based on at least one of the following grounds:

**Consent.** Individuals must have given their consent to the data processing in a way that is freely given, informed, specific, and capable of withdrawal at any time and without detriment to the individual. Consent should be recorded by an unambiguous positive action and cannot be inferred from the absence of an objection.

**Contractual.** Processing is necessary for the performance of a contract to which the individual is a party, or in order to take steps at the request of the data subject prior to entering into a contract.

**Legal.** Data processing is required to comply with a legal obligation to which CCS Insight is subject.

**Vital.** Data processing is necessary to protect the vital interests of the individual or another person.

**Public interest.** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.

**Legitimate interest.** Processing is necessary to pursue the legitimate interests of CCS Insight or a third party, except where such interests are overridden by the interests or rights of the data subject.

In practice, CCS Insight will frequently rely on the grounds of consent, contractual obligations and legitimate interest to process data for many of its activities.

## Purpose Limitation

Personally identifiable data should only be processed for the purposes specified in the transparency notification provided to data subjects. CCS Insight will only process data for the purposes specified in this policy and notified to individuals.

## **Data Minimization**

Personally identifiable data should be adequate, relevant and limited to what is needed for the purposes for which it is being processed. CCS Insight will collect only as much information needed for its original purpose and will not collect additional data "just in case".

## **Accuracy**

CCS Insight will endeavour to ensure that data is collected, stored and updated accurately. Any requests to update data will be dealt with promptly.

## **Storage Limitation**

Data should not be kept for longer than necessary for the purposes for which it is being processed. Periods of retention will be dictated by legal obligations, business processes or other reasons, such as the duration of a contract. CCS Insight may retain data after the termination of a contract if there is a likelihood that the contract will be renewed and require the processing of the retained data, subject to the right to be forgotten (see below).

If CCS Insight cannot establish a valid legal, business or other reason for retaining personally identifiable data, it will be securely deleted. In the absence of a more frequent policy of any given set of information, stored data will be reviewed annually and considered for deletion.

## **Integrity and Confidentiality**

Personally identifiable data must be processed in a manner that ensures its security, including protection against unauthorised or unlawful access and against accidental loss or damage. Such protection should involve technical and organisational safeguards.

CCS Insight will take appropriate measures proportionate to the risk associated with the data being processed. Such measures will include technical protections like passwords (with an appropriate strength), encryption of storage media and communication methods, and technologies such as SSL. They will also include organisational safeguards such as limiting data access to certain employees, vetting employees before granting access to data, conducting due diligence on third parties that process data on CCS Insight's behalf and binding them by an appropriate contract.

## **Accountability**

Data controllers are responsible for compliance with data protection principles and must be able to demonstrate compliance. As part of its efforts to demonstrate compliance, CCS Insight has published this policy and has documented evidence of reviews and training sessions for employees. Copies are available on request.

# Data Subject Rights

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Data subjects can access any personally identifiable data held on them by CCS Insight by writing to:

The Data Controller  
CCS Insight  
The Oakley  
Kidderminster Road  
Droitwich  
WR9 9AY

Information will be provided free of charge and within one month of the request.

## Right to Be Forgotten

The GDPR gives individuals the right to request the erasure of all data held about them in various circumstances. However, this right is not an absolute one, and some requests may therefore not be effected. It is likely that the most common reasons that CCS Insight will delete data are: the purpose for which the data was being processed no longer applies, or that the grounds for processing were based on consent, and the data subject has subsequently withdrawn their consent.

## Right to Rectification

CCS Insight will endeavour to ensure that any personally identifiable data is up to date and accurate. If an error is discovered, CCS Insight will correct it as soon as possible.

## Right to Data Portability

CCS Insight does not expect to process data that could be transferred in machine-readable format to another data controller at the request of a data subject. The limited amount of data involved would outweigh the benefit of transfer in a machine-readable format.

## Right to Object

Data subjects have the right, in specific circumstances, to object to having their data processed. CCS Insight will comply with such requests, subject to the provisions of the GDPR.



# Other Requirements

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## Reporting Breaches

In the event of a breach in the security of any system used to store and process personally identifiable data, CCS Insight will assess whether the breach risks the rights and freedoms of data subjects. If it considers such a risk is likely, CCS Insight will notify the ICO without undue delay and, where feasible, within 72 hours of the discovery of the breach.

If a security breach is likely to result in a high risk to the rights and freedoms of data subjects, CCS Insight will notify affected individuals without undue delay. However, CCS Insight is not required to notify data subjects if data is unintelligible (for example, by encryption), or if subsequent measures have been taken that remove the risk.

CCS Insight will maintain a schedule of data breaches, regardless of whether notifications have been issued.

## Third-Party Processors

CCS Insight has agreements with third parties to process data in limited circumstances. Its research portal at [my.ccsinsight.com](https://my.ccsinsight.com) is managed by Content Catalyst Ltd. To ensure the ongoing operation of the site, Content Catalyst processes personally identifiable data relating to users of the site, including names, job titles, e-mail addresses, passwords, and IP addresses.

CCS Insight stages events in conjunction with its clients. To administer these events, personally identifiable data will be shared with the organisers and sponsors. Attendees may opt out of further marketing communications at any time.

CCS Insight also uses a variety of third parties to conduct external services on its behalf, including processing payments, conducting surveys and distributing newsletters.

In all cases, third parties are permitted to process data only in the course of activities that support CCS Insight's regular business. CCS Insight does not sell, share or otherwise distribute personally identifiable data in support of third parties' businesses.

CCS Insight has written contracts with third-party suppliers that meet the requirements of the GDPR, and regularly reviews the activities and processes of its suppliers to ensure they continue to meet these requirements.