

## Data Protection Policy

### 1. Introduction

This Data Protection Policy outlines how Shape Innovation Ltd. ("we," "us," or "our") collects, uses, and protects personal data in accordance with the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018). We are committed to respecting the privacy of individuals whose personal data we process during the course of our training activities.

### 2. Definitions

- **Personal data:** Any information relating to an identified or identifiable living person.
- **Data subject:** The individual whose personal data is being processed.
- **Data controller:** The organization that determines the purposes and means of processing personal data. (In this case, Shape Innovation Ltd.)
- **Data processor:** Any person or organization that processes personal data on behalf of the data controller.

### 3. Data Protection Principles

We adhere to the following data protection principles:

- **Lawful, fair and transparent processing:** We will only process personal data in a manner that is lawful, fair, and transparent to the data subject.
- **Purpose limitation:** We will only collect personal data for specific, explicit, and legitimate purposes and not further process it in a manner incompatible with those purposes.
- **Data minimization:** We will collect and process only the minimum amount of personal data necessary for the purposes for which it is collected.
- **Accuracy:** We will take reasonable steps to ensure that the personal data we hold is accurate, complete, and up-to-date.
- **Storage limitation:** We will not retain personal data for longer than is necessary for the purposes for which it is processed.
- **Integrity and confidentiality:** We will implement appropriate technical and organizational measures to ensure the security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage.

- **Accountability:** We are accountable for compliance with these data protection principles.

#### 4. Legal Basis for Processing

We will only process personal data when we have a lawful basis to do so. The most common lawful bases for our processing activities will be:

- **Consent:** In some cases, we may ask for your explicit consent to process your personal data for a specific purpose. You have the right to withdraw your consent at any time.
- **Contractual necessity:** We may need to process your personal data to fulfill our contractual obligations with you, such as carrying out research for the reporting purpose of this program
- **Legitimate interests:** We may process your personal data for our legitimate interests, such as conducting research to improve our services or for statistical analysis purposes. However, we will only do so if your interests and fundamental rights do not override our legitimate interests.

#### 5. Data Collection and Use

The types of personal data we may collect during training activities include:

- Demographic information (e.g., age, gender, location)
- Opinions and preferences
- Survey responses
- Contact information (if provided with consent for marketing purposes)

We collect personal data directly from data subjects through surveys, interviews, focus groups, and online panels. We may also collect personal data from third-party sources, but only when permitted by law and with appropriate safeguards in place.

We will only use your personal data for the purposes for which it was collected, such as:

- Conducting market research surveys, interviews, and focus groups
- Analysing market trends and consumer behaviour
- Providing insights to our clients
- Sending marketing communications (only with your consent)

## 6. Data Retention

We will retain your personal data for no longer than is necessary for the purposes for which it was collected. Once your data is no longer needed, we will securely delete or anonymize it.

## 7. Data Security

We have implemented appropriate technical and organizational measures to protect your personal data from unauthorized access, disclosure, alteration, or destruction. These measures include:

- Secure data storage facilities
- Access controls
- Data encryption
- Regular security audits

## 8. Data Subject Rights

You have a number of rights under data protection law, including:

- **Right to access:** You have the right to request a copy of the personal data we hold about you.
- **Right to rectification:** You have the right to request that we correct any inaccurate personal data we hold about you.
- **Right to erasure:** You have the right to request that we delete your personal data.
- **Right to restrict processing:** You have the right to request that we restrict the processing of your personal data.
- **Right to data portability:** You have the right to request that we transfer your personal data to another organization.
- **Right to object:** You have the right to object to the processing of your personal data.