

## **Silverlight Research Privacy Notice**

### **1. Who we are and what we do**

#### **Who we are**

We are Silverlight Research Limited (“Silverlight”, “us”, “we”, “our”). We are a limited company registered in England and Wales under registration number 11124869 whose registered office is 52 Grosvenor Gardens, London, SW1W 0AU, England.

We are registered with the UK supervisory authority, Information Commissioner’s Office (“ICO”) as a Data Controller. Our registration number is ZA760718.

#### **What we do**

Silverlight is an expert network company and part of our business activities involve the identification of industry experts and the introduction of them to our clients, for the purposes of consultations and other interactions, to assist our clients in making informed strategic decisions. Joining our network means that Silverlight team members may contact Experts with project invitations. Clients of Silverlight may browse Experts on our platform and contact Experts directly for project invitations.

Unless we notify you otherwise, we are the controller and processor of your Personal Data. This policy sets out details of the types of Personal Data we collect about you and process it in compliance with the Data Protection Act 2018.

### **2. Purpose of this privacy notice**

Silverlight , respects your privacy and we are committed to protecting your personal information. This Privacy Policy sets out our personal information collection and sharing practices for our websites and through the other channels described below. Further notices highlighting certain uses we wish to make of your personal information, together with the ability to opt in or out of selected uses may also be provided to you when we collect personal information from you. We take our duty to control and process your personal information very seriously. Refer to the sections below for more details on how and why we use your information.

### **3. Who this privacy notice applies to**

This privacy notice applies to you if:

1. You visit our website.
2. You are one of our clients or Experts.
3. Correspond with us about our services, becoming an Expert or Client
4. Correspond with us by post, telephone, video call, email, SMS, WhatsApp, or other electronic means.
5. We identify you via social media (e.g. LinkedIn) or another publicly available source as a suitable candidate for an advertised Client role and contact you on this basis
6. You participate in our Survey.
7. Give us feedback.
8. Ask us for information.

9. You sign up to receiving project invitations or other communications from us.

#### **4. What is Personal Data**

'Personal Data' means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

'Special Category Personal Data' is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health etc.

#### **5. Personal Data we collect**

The type of Personal data we collect about you will depend on our relationship with you.

We process all information you give us, either through our website or by corresponding with us by telephone, email, online chat or otherwise. This includes information you provide when you use our website, become an expert or client, complete an online form or from other social media functions linked to our website or when you contact us for enquires or concerns.

We may process the following information when you are/or wish to become a Client or Expert:

- Name
- Address
- Email address
- Telephone number
- Company Name
- Job Title
- Other contact details
- Gender
- Date of Birth
- CV information and work experience
- Academic qualifications
- Nationality
- Views and opinions
- Bank/Payment information
- Online identifiers
- Communications data
- Any extra information you choose to tell us about you.

Please note this list is non-exhaustive. You can find out more information about the types of Personal Data we collect about you by contacting us at [compliance@silverlightgroup.com](mailto:compliance@silverlightgroup.com).

Details of your visits to the websites and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access. This information is collected under the process of Website Hosting, we process this data under legitimate interests. When you are browsing our website we have some essential cookies in use, this makes the website work and

ensures the security of the website. You can disable these cookies but it may affect the way the website works for you. We use Google Analytics to keep track of our website traffic, which may use cookies for this purpose.

## 6. Sources by which we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, video calls, email, text or via our website.

We may also gather information about you or your organisation from publicly available information such as:

- Websites
- Social Media Channels
- LinkedIn Profiles
- Companies House
- Reputable information providers

## 7. Purposes and lawful bases for which we use personal data

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

Purposes of Processing	Lawful Basis
To correspond with users via telephone, email, video calls, WhatsApp or Online Chat	It is in our legitimate interest to correspond with users who enquire about our services
To correspond with current experts registered on the platform or clients in order to fulfil project requests	Contractual obligation
To conduct surveys	To obtain your consent and ensure our business complies with the regulations.
To correspond with experts (via email, linkedin, sms, phone) who clients have expressed an interest in connecting with	It is in our legitimate interest to correspond with experts who clients wish to connect with via our platform
Membership registration for Engagement	Contractual obligation
To contact prospective new clients	It is in our legitimate interest to potential clients.
To monitor and record correspondence, telephone and video calls with clients	It is our Legitimate Interest to monitor our service quality, compliance procedures and combat fraud
To maintain and provide you with our services	Contractual obligation
To improve our website and overall user experience	It is in our Legitimate Interest to allow analytics and search engine providers to help improve and optimise our website
To manage financial arrangements and payments	Contractual obligation

To send clients marketing materials and inform you of changes to our products and services	Consent
To send registered experts information about new projects	Consent
To send experts information about our perks program after experts sign up via SMS/WhatsApp	Consent

Please note that where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

## 8. International Transfers

Wherever possible, all the personal information we process is processed within the UK or the European Economic Area (EEA). Some of our third-party service providers, are based outside the UK or EEA so their processing of your personal information will involve a transfer outside the UK or EEA.

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain industry standard physical, electronic and procedural safeguards to protect your personal information. Whenever we transfer your personal information outside of the UK or EEA, we ensure your personal information is secure by provided by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information equivalent to the Data Protection Act 2018; or
- Where we use certain service providers or share personal data with our US entity, Expert Network LLC, we will enter into UK's international data transfer agreement and also rely on the EU standard contractual clauses approved by the European Commission which give personal information the same protection it has in UK.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

## 9. Sharing information

If you have joined our Network as an Expert by completing our online webform, Silverlight will share your profile information (name, current job title and company, former job titles and companies worked at, and LinkedIn profile url) with our Clients through our expert network platform for purposes of matching you with potentially relevant projects. If you are an Expert registered on our platform and you also give consent for your contact details (email/telephone) to be shared with Silverlight Clients, Clients will have access to retrieve your contact details on our platform, and Clients may contact you as an Expert directly via email, Whatsapp, SMS or telephone, in order to invite you to relevant projects. If you have requested to be included on our platform, for the so that Clients can browse your work experience profile for the purpose

of inviting you to projects, then your work experience but not name will be available for Clients to view on the platform. You can change the way Clients can contact you to discuss projects at any time by updating your preferences at <https://www.silverlightexperts.com/expert-project-invitation-preferences.html>.

If you have contacted us by email or phone (rather than completing our online webform) and provided us with your profile information, we will contact you and invite you to join our Expert Network. Once you have confirmed that you would like to do so, we will share your profile information with our Clients by adding it to our Expert Network which our Clients can browse. However, your contact details will not be available to our Client unless we obtain your prior consent.

### **Contacting you about opportunities**

If you join our Network, we will contact you about opportunities that we consider will be of interest to you. If you do not want us to contact you again or you wish to be removed from our Network, just let us know by clicking on the unsubscribe button in any email you receive from us or by emailing us at [compliance@silverlightgroup.com](mailto:compliance@silverlightgroup.com) and we will action your request straight away.

Other than as detailed above, we do not share your information with any other organisations or individuals unless we are obliged to by law, for purposes of national security, taxation and criminal investigations and in the following instances:

- If you have agreed that we may do so
- If we sell the business – the new shareholders may obtain Expert or past Client information. This information would only be used for the same purposes for which it was originally obtained.
- If we run an event in partnership with other named organisations, your details may need to be shared. We will be very clear what will happen to your personal information when you register.

### **10. Retaining your information**

We hold your information only as long as necessary for data processing purpose(s) for which they were collected and any other permitted linked purpose. For example, your transaction information when you have been a client will be held for up to seven years for accounting purposes. At the end of the retention period, your personal data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and research purposes. Our retention periods are based on business needs or legal requirements.

### **11. Security of your Personal Data**

During the retention period we ensure the security and integrity of the information. We have implemented technical and organisational measures to safeguard your personal data and protect it from accidental or unlawful destruction, loss, or alteration and from unauthorised disclosure or access.

### **12. Your rights and how to complain.**

Silverlight takes the protection of personal data seriously. You have the right to ask us not to process or delete your personal information. You can exercise your right at any time by contacting us with your request details at [compliance@silverlightgroup.com](mailto:compliance@silverlightgroup.com).

You have several rights about how the personal information you provide can be used. These are:

- Transparency over how we use your personal information (**right to be informed**).
- The ability to request a copy of the information we hold about you, which will be provided to you within one month (**right of access**).
- Update or amend the information we hold about you if it is wrong (**right of rectification**).
- Ask us to stop using your information (right to restrict processing).
- Ask us to remove your personal information from our records (**right to be 'forgotten'**).
- Object to the processing of your information for marketing purposes (**right to object**).
- Obtain and reuse your personal information for your own purposes (**right to data portability**).
- Not be subject to a decision when it is based on automated processing (**automated decision making and profiling**).

If you are located in the US or any other country, the above rights may differ slightly. Nevertheless, we will adhere to the data protection laws in the state or country you reside.

If you wish to exercise any of these rights, please write to [compliance@silverlightgroup.com](mailto:compliance@silverlightgroup.com). If you wish to raise a complaint about how we have handled your personal information you can contact us and we will investigate the matter. If you are not satisfied with our response or believe we are not processing your personal information in accordance with the law, you may report this to the Information Commissioner's Office (ICO) who can be contacted online at:

[Contact us | ICO](#)

Or by telephone on 0303 123 1113.

If you would like to know more about your rights under data protection law, you can find out more at the Information Commissioner's Office website.

### **13. How to contact us and our Data Representatives**

#### **How to contact us if you are based in the EU**

Silverlight processes the personal data of individuals in the d European Economic Area, in the role of 'data controller' and 'data processor'.

If Silverlight has processed or is processing your personal data, you may be entitled to exercise your rights under GDPR in respect of that personal data.

If you would like to raise a question to Silverlight, or otherwise exercise your rights in respect of your personal data, you may do so by contacting our Data Protection Representative in the EEA:

- Sending an email to Data Rep at [datarequest@datarep.com](mailto:datarequest@datarep.com) quoting 'Silverlight Research Ltd' in the subject line, or
- contacting Data Rep via the online webform at [www.datarep.com/data-request](http://www.datarep.com/data-request)

**How to contact us**

If you wish to talk through anything in our privacy notice, find out more about your rights or obtain a copy of the information we hold about you, please contact us by emailing [compliance@silverlightgroup.com](mailto:compliance@silverlightgroup.com) and we will be happy to help.

**Data Protection Officer**

Contact details of the data protection officer

The designated data protection officer is:

DataCo International UK Limited

c/o One Peak Partners, 41 Great Pulteney Street, 2nd floor, London W1F 9NZ, United Kingdom

+44 20 3318 1718

[www.dataguard.co.uk](http://www.dataguard.co.uk)

**14. Changes to this Privacy Notice**

We may change the content of our websites and how we use cookies without notice, and consequently our Privacy Notice may change from time to time in the future. We therefore encourage you to review when you visit the website from time to time to stay informed of how we are using personal information, you will be able to see if changes have been made by the date it was last updated at the end of the document.

Last updated: August 2024