



Survey Galaxy Ltd Privacy and Cookie Policy

1.0 Introduction

- This privacy policy explains how we collect, use and process your personal data in line with our legal obligations. The privacy policy covers the following six personal data processing principles:
 - Lawfulness, fairness and transparency – How we process the data we collect lawfully, fairly and in a transparent manner in relation to the data subject.
 - Purpose limitation – How the data we collect is collected for a specific, explicit and legitimate purpose and it is not further used in a manner that is incompatible with those purposes.
 - Data minimisation – How the data we collect is adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed.
 - Accuracy – How we ensure that the data we collect is accurate and where necessary kept up to date.
 - Storage limitation – How the data we collect is kept in a form which permits identification of data for no longer than is necessary for the purpose for which the personal data is processed.
 - Integrity and confidentiality – How the data we collect is processed in a manner that ensures appropriate security of the personal data.
- Your privacy is important to us and our objective is to protect and safeguard your data privacy rights.
- This privacy policy applies to all the personal data that we collect and process of our website users, visitors, suppliers and other people that we may contact.
- In line with applicable data protection legislation, including but not limited to the General Data Protection Regulation (Regulation(EU) 2016/679) (GDPR) the company that is responsible for your personal data is Survey Galaxy Ltd and the details of how to contact us are contained in Appendix 1 of this documentation.
- This privacy policy may be amended periodically and is available from our website.

- If you object or are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and we have described such rights where they are relevant.
- Our Privacy Policy applies in all countries where our company and any of its subsidiaries operate. Where specific countries have different data protection requirements we will issue country-specific amendments, country specific variations to our privacy policy are contained under Appendix 2 of this documentation.
- Details of our data protection officers are detailed in Appendix 4 of this documentation.
- Who we share your data with is detailed in Appendix 5 of this documentation.
- Details of who is responsible for processing your personal data on our website are detailed in Appendix 6 of this documentation.
- Details of how we may use personal information in defending, exercising or establishing claims are detailed in Appendix 7 of this documentation.
- Our marketing activities are detailed in Appendix 8 of this documentation.
- Our cookie policy is detailed in Appendix 9 of this documentation.
- We act in good faith and if you have any concerns with regards to our privacy or cookie policy, or any of the services that we provide, we would encourage that you contact us with your concerns or queries using the contact details that are listed in Appendix 1 of this documentation.

1.1 General description

The Survey Galaxy website allows registered user the ability to create and design their own surveys, have them published, completed by others and to view the results in real-time. The website is available to private and public companies, organisations and individuals.

When this privacy policy refers to “you” and “your” we mean “the registered user”.

In this policy document when we refer to “Us” or “Our” or “We” or “Survey Galaxy” we mean Survey Galaxy Ltd.

When we refer to “meaningful contact” we mean communication between us or where you have actively engaged with our website or online services.

2.0 What type of personal data do we collect?

There are four category of people that we interact with, in some instances people can be in more than one category.

- Registered user
- Account user
- Respondents
- Supplier
- Website visitor

For details as to the legal basis that we rely on to be able to use and process the personal data that we collect please see Appendix 3 of this documentation.

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss or unauthorised access. We do this by implementing best practice technical and non-technical measures. We make every effort to promptly implement hardware and software security updates, subject to the necessary testing, and we implement measures to try and prevent and detect data breaches.

If you suspect any loss, misuse or unauthorised access to your personal data please contact us immediately using the contact details listed in Appendix 1 of this documentation.

2.1 Registered user data

2.1.1 What registered user information is collected?

Your email address is required to create an account.

2.1.1.1 Registered user primary information

Once your account had been created we ask for some basic information from you that will allow us to address you properly and for us to determine the billing requirements.

It is not mandatory that you provide this information until such time that you take out a subscription.

The information we requested includes:

- Title
- Full name
- Job Title
- Country of residence
- Company name
- Company division
- VAT Number
- Billing Address
- Contact numbers

- Default language

2.1.1.2 Registered users other information

In addition to collecting personal information, we also collect information such as details about how you engage with our website, or read or click on an email from us, these will include, but are not limited to, your IP address, the duration and frequency of your visits, details about the equipment being used and your website activity.

2.1.2 How do we collect registered user information?

We collect registered user's information:

- Directly from you
- From traffic analytical applications and cookies

2.1.2.1 Directly from you

- When you register we ask you to provide information about you in order that we can address and bill you correctly.

2.1.2.2 From traffic analytical applications and cookies

We install third-party traffic analytical applications on our website that monitor the website traffic and the web pages that are accessed.

Cookies store information that tracks visitors visits, please refer to Appendix 9 for details regarding our website's cookie policy.

2.1.3 How do we use the registered user information that is collected?

2.1.3.1 Registered user primary information

The information we collect about you is stored in a secure database and access to that data is private to you.

We use the primary information that we collect to address you correctly when we offer support and when the system auto generates email confirmations such as when a survey has been published.

We use your default language to set the default language when you create surveys.

If you take out a subscription we will use the personal information that we have collected to prepare an invoice.

Where appropriate and in accordance with local laws and requirements we may also use your personal data for other things such as marketing, monitoring and the maintenance of our website and where appropriate we will seek your prior consent should we undertake these activities.

2.1.3.2 Registered user's other information

The other information that is collected is used by us to assist in our marketing and the monitoring and maintenance of our website. In nearly all cases the data used is anonymised and where it is not, and where it is appropriate, we will seek your prior consent before it is used.

2.1.4 How long do we keep the registered user information that is collected?

2.1.4.1 Registered user's primary information

Your account will remain active unless you choose to delete it. If you delete your account, your personal primary information will be deleted.

As a general rule we do not proactively delete accounts as we appreciate that some users may only require our services periodically. We consider that the primary information that we retain may need to be updated but is unlikely to be obsolete.

If we have had no meaningful contact with you for a period of four years we may periodically decide to purge dormant accounts but if we do, we will make every effort to contact you in advance.

2.1.4.2 Registered user's other information

In addition to holding information for the people who are actively using the Survey Galaxy website and its services we may also hold information on you or people within your organization that is necessary in accordance with our site maintenance, development, marketing and billing activities.

Analytical data is retained for a period of ten years.

2.2 Account user data

2.2.1 What account user data is collected?

2.2.1.1 Account user primary information

Your email address is required to join an account.

The account administrator will send you an email inviting you to join the account and in doing so will have provided us with basic information about you.

The account primary information we collect may include:

- Name
- Job title
- Email address

- Contact details

2.2.1.2 Other account user information

In addition to collecting personal information that allow us to provide you with a survey publication service, we also collect information such as details about how you engage with our website, or read or click on an email from us, these will include, but are not limited to, your IP address, the duration and frequency of your visits, details about the equipment being used and your website activity.

2.2.2 How do we collect account user information?

We collect account user information:

- Directly from you
- From your colleagues within your organization
- From traffic analytical applications and cookies

2.2.2.1 Directly from you

- Your account administrator will initially provide us with your personal details but once you are logged in you can change your profile settings yourself.

2.2.2.2 From your colleagues within your organization

- The organization's Survey Galaxy account is maintained and managed by the organization's nominated account administrators.
- The nominated account administrators assign users to the account and in doing so will provide us with details such as contact details, names and job titles.

2.2.2.3 From traffic analytical applications and cookies

We install third-party traffic analytical applications on our website that monitor the website traffic and the web pages that are accessed.

Cookies store information that tracks visitors visits, please refer to our website's cookies policy document for more details on cookies.

2.2.3 How do we use the account user information that is collected?

2.2.3.1 Account user's primary information

The information we collect about you is stored in a secure database and access to that data is private to you and your organization.

The account user's primary information is used to allow you to create and publish surveys and for use to send you automated emails that are properly addressed.

We hold information that is supplied and maintained by you such as company name, address and VAT number.

Where appropriate and in accordance with local laws and requirements we may also use your personal data for other things such as marketing, monitoring and the maintenance of our website and where appropriate we will seek your prior consent should we undertake these activities.

2.2.3.2 Other account user information

We collect other information that we use to assist us in the marketing and the monitoring and maintenance of our website. In nearly all cases the data used is anonymised and where it is not, and where it is appropriate, we will seek your prior consent before it is used.

2.2.4 How long do we keep the account user information that is collected?

2.2.4.1 Account user's primary information

Your account will remain active unless your account administrator chooses to disable or delete it. If your account is deleted your primary information will be removed.

We do not delete users from the account as the account holder is responsible for the account administration.

If we have had no meaningful contact with the account administrator for a period of four years we may decide periodically to purge dormant accounts but if we do, we will make every effort to contact the account administrator in advance.

2.2.4.2 Account user's other information

Analytical data is kept for a period of ten years.

2.3 Respondents

2.3.1 What respondent information is collected?

2.3.1.1 Primary respondent information

We do not collect any identifiable information from respondents.

2.3.1.2 Secondary respondent information

If a respondent completes a survey that requests personal information from the respondent, we will hold that information on our servers. We do also hold information from partially completed surveys.

The publisher can identify respondents by sending personalised invitations to respondents, in which case the publisher would be able to match responses to specific respondents.

2.3.1.3 Other respondent information

In addition to collecting the primary and secondary respondent information we also collect information such as details about how you engage with our website, or read or click on an email from us, these will include, but are not limited to, your IP address, the duration and frequency of your visits, details about the equipment being used and your website activity.

2.3.2 How is the respondent information collected?

- Directly from you
- From traffic analytical applications and cookies

2.3.2.1 Directly from you

When you undertake to complete a survey that is published on our website we collect and store your answers.

2.3.2.2 From traffic analytical applications and cookies.

We install third-party traffic analytical applications on our website that monitors the website traffic and the web pages that are accessed.

Cookies store information that tracks visitors visits, please refer to our website's cookies policy document for more details on cookies.

2.3.3 How do we use respondent information that is collected?

2.3.3.1 Primary respondent information

Your response data is stored on our servers and the information that you provide is made available to the published survey's owner and anyone else that the survey owner grants access to.

2.3.4 How long do we keep the respondent information that is collected?

2.3.4.1 Respondent information

The survey response data is retained for as long as the survey's publisher requires the survey data to be retained.

Analytical data is kept for a period of ten years.

2.4 Supplier data

2.4.1 What information is collected?

The personal data we hold about our suppliers is sufficient to ensure that the activity between us runs efficiently. The supplier information that we collect includes:

- Name
- Job title
- Responsibilities
- Email address
- Contact details such as telephone, mobile and Skype address

- Address
- Bank details

2.4.2 How do we collect the supplier information?

We do not have any formal method for collecting supplier information. The information is obtained through our interaction with you such as your supplier invoicing, your sales and marketing channels and/or advertisements.

2.4.3 How do we use supplier information that is collected?

We use the supplier information that we collect to communicate and interact with you throughout the course of our business relationship.

2.4.4 How long do we keep the supplier information that is collected?

2.4.4.1 Supplier information

We keep the information for as long as there is meaningful contact between us. If there is no meaningful contact between us for a period of three years we may delete your information where it is practical and legal for us to do so.

2.5 Website visitor data

2.5.1 What information is collected from website visitors?

2.5.1.1 Primary information

If you visit and contact us through the website we might through our communications with you collect personal information about you such as your name, email address and contact details.

2.5.1.2 Other information

In addition to any primary website visitor information we also collect information such as details about how you engage with our website, or read or click on an email from us, these will include, but are not limited to, your IP address, the duration and frequency of your visits, details about the equipment being used and your website activity.

2.5.2 How do we collect the website visitor information?

- Directly from you
- From traffic analytical applications and cookies

2.5.2.1 Directly from you

We obtain information from you through our communications with you.

2.5.2.2 From traffic analytical applications and cookies.

We install third-party traffic analytical applications on our website that monitors the website traffic and the web pages that are accessed.

Cookies store information that tracks visitors visits, please refer to our cookies policy document for more details on cookies.

2.5.3 How do we use the website visitor information that is collected?

The information that we collect from you when you visit our website is used to assist in the marketing and the monitoring and maintenance of our website. In nearly all cases the data used is anonymised and where it is not, and where it is appropriate, we will seek your prior consent before it is used.

2.5.4 How long do we keep the website visitor information that is collected?

2.5.4.1 Website visitor information

Analytical data is kept for a period of ten years.

3.0 How do you access, amend or delete the personal information you have given us?

- If you have an account, you may ask us to delete it, and your personal information will be removed.
- If you have any other requests or concerns about the personal information we have about you please contact us, see Appendix 1 of the document for our contact details. We will make every effort to deal with your request as quickly as possible, or if applicable, within the requirements of any applicable laws.

3.1 Right to object

If we are using your data because we consider it necessary for our legitimate interests to do so, and you disagree, you have the right to object. We will make every effort to deal with your request as quickly as possible, or if applicable, within the requirements of any applicable laws.

3.2 Right to withdraw consent

Where we have requested, and you have granted your consent, you have the right to withdraw your consent at any time. You may do this, for example if you are an applicant, by withdrawing your application from a campaign, but if it is not clear how you withdraw your consent please contact us using the information contained in Appendix 1 of this document and we will make every effort to deal with your request as quickly as possible, or if applicable, within the requirements of any applicable laws.

3.3 Right to restrict processing

You have the right to request that we restrict our processing of your personal data in certain circumstances. This would allow us to continue to hold your data, but we would not be able to carry out any further processing of that data until you:

- Provide your consent

- Further processing is necessary by us to defend a legal claim, to protect the rights of another individual, or where it is in the legal public interest, or where we are compelled to do so by a legal body

You may exercise your right to restrict the processing of your data if:

- You dispute the accuracy of the information
- Where you object to the processing of your data for a legitimate reason
- Where the processing of your data is unlawful, but you would rather the processing was restricted rather than the information deleted
- Where you consider the information that we are processing to be redundant and no longer valid for the purpose it was intended

3.4 Data Subject Access Request (DSAR)

You have the right to ask us to confirm what information we hold about you and at any time and you may ask us to delete, update or modify such information.

We may ask for more information regarding your request.

We will comply with your request providing that we are able to satisfactorily confirm your identity and providing we are legally permitted to do so. If we decline your request, we will provide you with the reasons your request was declined.

3.5 Right of erasure (Right to be forgotten)

In certain circumstances you have the right to request that we “erase” your personal data. We will make every effort to deal with your request as quickly as possible, or if applicable, within the requirements of any applicable laws.

If we comply with your “right of erasure” request we may keep a record of your contact details on our “do not contact” register, if you would prefer us to remove you from this register you are free to advise us.

3.6 Right of data portability

You have the right to request that your data is transferred from us to another data controller. We will assist you with this either directly or by providing you with a commonly used machine-readable formatted file.

Please note that our systems use a complex and bespoke database design and although we will make every effort to provide you with the information you require in a format that can be ported and that we will comply with our legal obligations, the requested format may not always be possible.

3.7 Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with your local supervisory authority, if you are unsure who that is, or their contact details, please contact us using the information contained in Appendix 1 of this document and we will make every effort to deal with your request as quickly as possible, or if applicable, within the requirements of any applicable laws.

4.0 Breach notification

If there is a breach of our server that is likely to have “resulted in a risk for the rights and freedoms of individuals”. We will notify you “without undue delay” after first becoming aware of a data breach, or if applicable, within the time requirements of any applicable laws.

5.0 Consent

In certain circumstances we are required to obtain your consent.

5.1 Registered user consent

5.1.1 On registration

When you register we will provide you with links to our terms and conditions, this privacy policy and other policies that we would like you to read before you freely give your consent.

5.1.2 Consent records

We will keep records of where and when your consent was requested and granted.

5.1.3 Your right to withdraw your consent

5.2 Account user consent

5.2.1 On invitation

When your account administrator invites you to use the account you will be sent an invitation containing a link to this privacy policy and other policies that we would like you to read before you freely give your consent.

5.3 Respondent consent

5.3.1 On invitation

We do not seek the consent of respondents who complete published surveys as they are by default completed anonymously. If the survey contains requests for personal information the survey’s publisher may include privacy statements but Survey Galaxy Ltd are not party to such agreements. Should respondents have concerns they should contact us using one of the methods detailed in Appendix 1 of this documentation.

Appendix 1

How to contact us:

Email: contact@surveygalaxy.com

Address: Survey Galaxy Ltd
57B Vale Road
London.
N4 1PP
United Kingdom
Company Registration Number: 4820577
VAT registration: 817 3910 27

Appendix 2

Country-specific Privacy Policy amendments

There are currently no country privacy policy amendments

Appendix 3

Our legal bases for processing your data

Our legitimate interests

Article 6(1)(f) of the GDPR states we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

We consider that the service we provide to all those that use our website is in line with the GDPR requirements but if you have the right to object to us processing your personal data on this basis. Should you wish to object please contact us using the information in Appendix 1 of this document.

Registered Users:

We think we are being reasonable when you arrive at our website that we provide you with all the necessary information that you need to make an informed decision on whether you want to register with us.

It is our view that the information that we request from you is in our legitimate interest to use and is necessary in order to deliver the services we provide.

You are not required to give the information that we request.

It is in our legitimate interest to comply with the law in the jurisdictions that we operate and if we believe in good faith that it is necessary, or if we are compelled to do so by any legal entity that has jurisdiction, we may

share your data in connection with crime detection, tax collection or actual or anticipated litigation.

We store your personal data and/or the personal data of individual contacts at your organization as well as keeping records of our conversations and meetings.

From time to time, we may also ask you to undertake a customer satisfaction survey.

We deem these uses of your data to be necessary for our legitimate interests as an organization providing you with a recruitment management service.

Supplier:

We use and store the personal data of individuals within your organization to facilitate the receipt of services from you as one of our suppliers.

We also hold your financial details, so that we can pay you for your services.

We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

Respondents:

We do not keep any identifiable information about respondents unless the survey that is completed by the respondent requests such information.

Appendix 4

Data Protection Officers

We adhere to internal record keeping requirements by:

- staff members;
- who are suitably qualified;
- whose details are provided to the relevant Data Protection Agency;
- who are given the appropriate resources to carry out their tasks and maintain their expert knowledge;
- who report directly to the highest level of management;
- do not carry out any other tasks that could result in a conflict of interest

Appendix 5

Who we share your data with

Where it is appropriate to do so and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Our company and any of its subsidiaries
- Tax, audit, or other authorities, where by law or other regulation we are required to share the data
- Third party service providers who perform functions on our behalf such as external consultants, business associates and professional advisers such as lawyers, auditors, accountants, technical support functions and IT consultants carrying out testing and development work on our recruitment management application
- Third party outsourced IT and document storage providers where we have the appropriate processing agreement (or similar protections) in place
- Marketing technology platforms and suppliers
- If our company is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

How do we store, transfer and share your data internationally?

Where possible the data will reside in the United Kingdom.

It is however possible that your data is transferred internationally when we are communicating and working with:

- Our company and any of its subsidiaries
- Third parties such as suppliers, consultants and advisors
- Overseas clients, and their personnel who operate internationally
- Clients who, although are not based internationally, may travel temporarily and in turn access and transfer data internationally
- Cloud-based storage supplier
- Cloud-based backup providers
- Other marketing technology platforms and suppliers

We will make every effort to minimise the need to store, transfer and share data internationally, but where it is considered necessary, we will take all reasonable steps to ensure that your data is stored and transferred in a secure way.

Appendix 6

Those responsible for processing the personal data held by our website

- The country in which you use our website and the services we provide is the United Kingdom
- The entity that is responsible for processing the personal data of website users is Survey Galaxy Ltd

Appendix 7

Defending, exercising or establishing legal claims

Where it is appropriate and in accordance with local laws it may be necessary for us to process personal data in connection with defending, exercising or establishing legal claims.

For example, we may need to take legal advice in relation to legal proceedings or we may be compelled by a legal body to preserve or surrender certain information as part of a legal process.

We may use and preserve your personal information as evidence in the following circumstances:

- When we have reason to suspect that the data being held on our servers is in breach of the website's terms and condition or where the personal details suggest that the user contravenes our website's terms and conditions.
- When we have reason to suspect that our website is being used to store offensive or illegal content, or facilitate action that is illegal, or our website is being used to support action that could bring our company into disrepute with others.
- Where it has been reported that our website has been used in a manner that contravenes the website's terms and conditions.

Appendix 8

Our marketing activities

We may periodically send you information that we think you may find interesting and of benefit to you, and we may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. To:

- Enable us to develop and market other products and services
- Send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you
- Market our survey service to you
- Provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with us

- Where we have your permission to do so, display promotional excerpts from your details as a successful case study

Where we need your explicit consent for some of these activities that are not covered by our legitimate interests (for example, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) in which case we will where we are required to do so, we will seek your consent via an opt-in option.

You have the right to withdraw your consent at any time by contacting us, if you feel that we are contacting with marketing material without your consent please raise your concerns by contacting us.

It is never our intention to send marketing material that is inappropriate or unwanted. If we send you information that you do not want please contact us and we will do our best to rectify the situation and learn from our mistake.

To contact us use one of the methods detailed in Appendix 1 of this documentation.

We may periodically send you information that we think you may find interesting and of benefit to you, and we may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. To:

- Enable us to develop and market other products and services
- Send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you
- Market our online survey service to you
- Provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with us
- Where we have your permission to do so, display promotional excerpts from your details as a successful case study
- Request you to be a reference for our potential clients

Where we need your explicit consent for some of these activities that are not covered by our legitimate interests (for example, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) in which case we will where we are required to do so, we will seek your consent via an opt-in option.

You have the right to withdraw your consent at any time by contacting us, if you feel that we are contacting with marketing material without your consent please raise your concerns by contacting us.

It is never our intention to send marketing material that is inappropriate or unwanted. If we send you information that you do not want please contact us and we will do our best to rectify the situation and learn from our mistake.

To contact us use one of the methods detailed in Appendix 1 of this documentation.

Appendix 9

Our cookie policy

What is a cookie?

A "cookie" is a piece of information that is stored on your computer.

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings which we give guidance on below.

How do we use cookies?

We use cookies to:

- to remember your preferences

There are two types of cookie:

- Session cookies that are stored on your computer but are automatically deleted when you close your browser.
- Persistent cookies that are stored as a file on your computer and are not deleted when you close your browser.

The cookies we use can be categorised as:

- Strictly necessary
- Preference

Strictly necessary

These cookies are essential to enable you to use the website and if they are turned off the website will not function correctly. These cookies do not

gather information about you that can then be used for marketing or tracking purposes.

Cookies are used to track a survey respondent's responses allowing for the survey respondent to view and continue partially completed surveys. If the cookies are cleared by the survey respondent, the context to the surveys undertaken will be lost.

When enabled by the survey publisher, a cookie may be retained to allow editing of previously submitted responses.

Preference

These are cookies that allow our website to remember the choices that you make, for example to remember the search filters, sort order and your default campaign.

Cookie information

The cookies that are used by the website are necessary and are not used to exchange information with any other third-party.

How to reject cookies

You can adjust your browsers settings if you don't want to use cookies that are not strictly necessary to perform basic features of our site.

Using your browser's security settings, you can choose to accept all or some, or reject cookies. Please note that if you choose to reject all cookies, our website will be unable to function correctly.

Making modification to a browser's security settings is different for each make of browser (Chrome, IE, Edge, Firefox, Safari etc) and you will need to refer to the browser's documentation for details on how to make changes to your browser's cookie preferences.

For more independent cookie information, including how to disable them, please refer to aboutcookies.org where you will also find details on how to delete cookies from your computer.

Glossary

Glossary of terms

"Our Company"	Survey Galaxy Ltd and where appropriate any of its subsidiaries.
"Survey Galaxy Website", "Website"	The website that is located at the URL addresses:

- <https://www.surveygalaxy.com>
- <https://surveygalaxy.com>

“Survey”	An online survey that is published through our platform.
“Registered Users”, “Clients”	Those that engage with the website that have registered via the website’s registration portal.
“Account Users”	Those that engage with the website having accepted an invitation to join an existing account.
“Suppliers”	Refers to partnerships and companies (including sole traders), and workers such as independent contractors and freelance workers, who provide services to Survey Galaxy Ltd and any subsidiaries.

In certain circumstances Survey Galaxy Ltd will sub-contract the services it provides to Clients to third party suppliers who perform services on Survey Galaxy Ltd's behalf. In this context, suppliers that are individual contractors, freelance workers, or employees of suppliers will be treated as registered users for data protection purposes and that in this context, Survey Galaxy Ltd requires Suppliers to communicate the relevant parts of this Privacy Policy (namely the sections directed at registered users) to their employees.

“Others”	When we refer to others we mean individuals whose personal details that we hold for legitimate purposes who may not have consented or directly engaged with us, such as those nominated as emergency contacts. We will only contact them in appropriate circumstances.
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“Respondent”	Someone who completes a survey that is published on our platform.
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“Website Visitor”	Any individual who accesses any part of the Survey Galaxy website that do not register or login.
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“General Data Protection Regulation (GDPR)”	Refers to the European Union statutory instrument which covers European data protection laws effective from 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.
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“Delete”, “Erase”	We will make every effort to permanently erase your personal data once it reaches the end of its retention period or where we receive a valid request from you to do so, some of your data may still exist within our systems, for example if it is marked as deleted but is waiting to be overwritten.
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For our purposes, this data has been put beyond use, meaning that, while it still exists on a backup or archive system, this cannot be readily accessed by any of our operational systems, processes or personnel.