

## **Keystone Privacy Statement – July 2016**

Keystone is committed to the protecting the anonymity of respondents and protecting data of all our clients. Keystone uses a wide-range of new technologies in order to carry out its aims and objectives, and understands that while offering huge potential to our work these technologies need to be used with care.

Data can include personal information, however we have analyzed the risks of collecting and holding data in all areas of our work, and believe we have adopted appropriate privacy measures.

While Keystone collects a lot of data, it does not collect particularly sensitive (including biometric) information or sensitive security-related data. The vast majority of the data we collect is perceptual feedback data, and we are constantly reviewing what we collect to make sure we are only focusing on relevant, actionable and needed data. Moreover, we pay particular attention to how we collect information, to ensure it is an appropriate approach, maximizing the security of data as it comes to us. This involves tailoring our collection methods to suit each situation, ensuring a respect for local contexts and cultures that minimizes the potential harm to anyone who participates in our work.

In particular, the growing prevalence of mobile phone technology represents one of the most cost-effective and far-reaching data collection methods available to us, but at the same time, one of the greatest data risks to our work, not only during the process of data transmission but also by involving personal phone details.

We use mobile technology for one-way messaging, two-way communication and tracking and mapping. Individuals are advised at the point of contact of any charges in using their mobile phones. We cannot guarantee the safe transmission of data by mobile phones, but the type of data we collect is not normally sensitive. Once received, mobile data including phone numbers are kept and stored safely and only shared in accordance with this policy and with parties pre-approved by those providing the data to us.

Surveys are always preceded by an explanation of how data is held and used, and particularly whether the data is anonymized or held in a way that links the data to an identifiable individual. Where data is collected and held non-anonymously, this is made clear to potential respondents in advance so that in answering the survey they are providing consent to this use. Individual data (data that is not aggregated or not presented in a summary format) is never disclosed to anyone outside of Keystone, its affiliated or associated companies, and the commissioning client – all of whom have to agree to abide by our privacy policy as a part of their contract with us.

In most cases the data we hold is anonymized so that it cannot be attributed to an identifiable individual. Having said that, it often relates to a specific organization, and we therefore ensure it is held securely, and not circulated beyond parties that have been preauthorized by those providing the data. Such parties normally include, but are not limited to, the organization that has commissioned the survey. When the data we hold contains respondent identifiers, we ensure these are removed before being passed on or published.

Should we hold data we have not ourselves collected, for example in the <u>Feedback</u> <u>Commons</u>, the data will need to meet our data collection guidelines. However Keystone will not be responsible for the content of the data, or the approach with which it was collected. That said, the submitted data will still be held in accordance to the principles stated above.

Keystone often uses data to provide benchmarks in certain sectors. When doing so, Keystone will ensure that data cannot be associated with any particular organization unless that organization elects to associate itself publicly with its data. While it may be stated which organizations are included in the benchmarks, the data will not be attributed to specific organizations. Every organization that works with us is made aware of this approach.