

# Privacy Policy – Aha Agency Ltd

**Contact for Data Protection Enquiries**: admin@ahaagency.uk.

Last reviewed: 3 July 2025

### 1. Introduction

Aha Agency Ltd respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, and share personal data across our research, insight, and consultancy work. It also informs you about your rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We conduct ethical, independent research and design work in support of public, charitable, and social purpose organisations. Participation is always voluntary, and we only process your data with a valid lawful basis - typically your informed consent.

#### 2. Who we are

Aha Agency Ltd is a UK-based research and consultancy company registered in England and Wales.

• **Company number:** 13806810

• Registered address: 85 Great Portland Street, First Floor, London, W1W 7LT

• Email: admin@ahaagency.uk

We deliver quantitative, qualitative and mixed-methods research, strategy, evaluation, and service design for commercial, public and social sector organisations.

For questions, data requests, or concerns, please contact: admin@ahaagency.uk.



# 3. Scope of this policy

This policy applies to:

- Individuals who take part in interviews, surveys, workshops, or other research conducted by Aha Agency Ltd
- Individuals who opt in to be contacted for future research
- Users who submit data via our website, contact forms, or survey platforms
- Any personal data we collect and process in the course of delivering insight or consultancy work

This policy does not cover the independent data use or privacy policies of our clients unless clearly stated in a joint research arrangement.

# 4. What personal data we collect

Depending on the context or project, we may collect the following types of personal data:

### a) Personal Identification Data

This includes your name, email address, phone number (if provided), and postal address where needed — for example, to send participation vouchers.

### b) Demographic and Contextual Data (if voluntarily provided)

We may ask for details such as your age or age group, gender identity, ethnicity, geographic region or location, occupation or employment status, education level, caring responsibilities, and information about your health or financial wellbeing, if relevant to the research.

### c) Research Participation Data

We collect your survey responses, interview transcripts or notes, and any opinions, behaviours, or experiences you share during research activities. This may also include written quotes, audio or video recordings (with your consent), and records of the consent preferences you provide.

### d) Special Category Data (only with explicit consent)



Where relevant and explicitly consented to by you, we may collect sensitive information such as your racial or ethnic origin, health or disability status, sexual orientation or gender identity, and religious or political beliefs.

### e) Technical and Website Data

When using our website or online platforms, we may collect technical information such as your IP address, browser type, and cookie preferences or analytics data to help us improve the digital experience.

# 5. How we collect your data

We collect data in several ways:

- Directly from you, when you take part in interviews, surveys, or sign-up forms
- Via third-party recruiters, where you've agreed to be referred for research
- Through our website, if you submit a contact form or engage with research content
- From our clients, who may provide limited contact details for their customers or donors so we can invite them to relevant research

# 6. How we use your data

We use your data for the following purposes:

- To invite and manage participation in research
- To conduct and analyse research findings
- To anonymise or pseudonymise data for reporting
- To administer payments for participation (where applicable)
- To comply with legal or financial obligations (e.g. tax records)

#### We do not:

- Sell your data
- Use your data for marketing
- Share personal data with clients unless explicitly consented



# 7. Lawful basis for processing

We rely on one or more of the following legal bases under UK GDPR:

- Consent (Article 6.1.a): for research participation and data collection
- Contractual obligation (Article 6.1.b): to process data for payments or incentives
- Legitimate interests (Article 6.1.f): to conduct non-commercial, social research where appropriate
- Explicit consent (Article 9.2.a): for processing special category data

You can withdraw consent at any time by contacting: admin@ahaagency.uk

### 8. Who we share your data with

We may share data with:

- Clients only anonymised or pseudonymised findings (unless you consent otherwise)
- Research participant recruitment agencies if supporting participant coordination
- Third-party processors such as transcription services, secure cloud platforms, or survey software
- Legal or regulatory authorities only if required by law

Where we use third-party tools (e.g. for transcription or data collection), these providers act as data processors under contract, and are bound by strict confidentiality and data security terms.

We do not sell your data or use it for direct marketing.

### 9. International data transfers

Your data may occasionally be processed or stored outside the UK or EEA, depending on the platforms we use. When this occurs, we ensure your rights remain protected through:

- Adequacy decisions (recognised by the UK or EU)
- Standard Contractual Clauses (SCCs) agreed with the receiving provider



To request more details about these safeguards, contact: admin@ahaagency.uk.

### 10. Data retention

We keep personal data only as long as necessary for its purpose.

Research data (e.g. transcripts or notes) is retained for up to three years after a project ends. Contact details are kept for up to twelve months, or longer if you've opted into future research. Financial records related to payments are kept for six years to meet legal and tax obligations.

After these periods, data is securely deleted or anonymised.

### 11. Data security

We take data security seriously and use:

- Encryption for data in transit and at rest
- Access controls and role-based permissions
- Secure cloud platforms and storage
- Training for staff and contractors on GDPR and ethics

# 12. Your rights under UK GDPR

You have the right to:

- Access your personal data
- Rectify inaccurate or incomplete data
- Request erasure ("right to be forgotten")
- Restrict or object to certain processing
- Withdraw consent at any time
- Data portability to transfer your data elsewhere

To exercise any of these rights, contact us at admin@ahaagency.uk

If you are not satisfied with how we handle your data, you have the right to complain to the Information Commissioner's Office (ICO): https://ico.org.uk/make-a-complaint/



# 13. Children's data

We do not knowingly collect data from individuals under 16 without verified parental or guardian consent. Youth-focused projects will follow additional safeguarding and consent procedures.

# 14. Updates to this policy

We review this Privacy Policy regularly. If significant changes are made that affect how your data is used, we will notify you.