

## **1. Introduction**

- 1.1 Bell & Holmes Research Ltd. (“we,” “our,” “us”) is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data when you visit our website (“Website”), participate in our surveys, or otherwise interact with us. It also outlines your rights under applicable data protection laws.
- 1.2 For the purposes of this Privacy Policy: “Respondent” means any individual who voluntarily participates in our surveys, interviews, or research activities and provides information or responses in that capacity; and “Client” means any corporate entity to whom we provide our services and on whose behalf survey or research activities may be conducted. A voluntary “Research Panel” refers to a list of Respondents who have explicitly consented to be re-contacted for potential future surveys or research projects. Participation in the Research Panel is optional, and declining to join does not affect your ability to complete any survey or receive incentives.

## **2. Information We Collect**

We may collect the following types of personal data:

### **2.1 Information You Provide**

- Name
- Email address
- Phone number
- Company/organization name
- Industry and employment role

- Any other information you provide through contact forms, emails, or other means
- Responses, data and related identifiers you voluntarily submit as part of our surveys, interviews, or research activities (“Respondent Data”).

Where you have consented to join our voluntary Research Panel, the same professional identifiers and contact details listed above may also be retained for the purpose of inviting you to participate in future research projects.

## 2.2 Information We Collect Automatically

When you visit our Website, we may automatically collect the following data:

- IP address
- Browser type and version
- Operating system
- Referring website
- Pages you visit
- Date and time of your visit
- Device information
- Other technical identifiers

## 2.3 Cookies and Tracking Technologies

We use cookies and similar technologies to enhance your experience, analyze usage patterns, and provide targeted advertisements. For detailed information, please refer to our [Cookie Policy](#).

## 2.4 Special Categories of Data

We do not intentionally collect special categories of personal data (e.g., health information, political or religious opinions) unless explicitly required for a defined research purpose and only with your explicit, informed consent actively given at the point of collection. You may decline to answer any such question and may withdraw your consent at any time without detriment.

### **3. How We Use Your Information**

We use your personal data for the following purposes:

- To provide, operate, and maintain our Website.
- To communicate with you, including responding to inquiries and sending updates.
- To analyze and improve the performance of our Website.
- To comply with legal obligations.
- To provide targeted marketing and advertising.
- To detect, prevent, and address security threats and fraud.
- To administer and protect our business and the Website.
- To conduct surveys, interviews, and research activities for our Clients based on Respondent Data and to analyze results.
- To ensure the integrity of our research, noting that participation is entirely voluntary and that we do not offer or provide improper financial or other inducements intended to influence your responses.
- To administer voluntary incentives for Respondents, which may include transmitting limited personal data to our incentive distribution service provider.
- To contact you with invitations to future surveys or research projects, but only where you have explicitly consented to join our voluntary Research Panel.

### **4. Legal Basis for Processing**

Depending on your location, our processing of your personal data may be based on:

- **Consent:** When you have given your explicit consent (e.g., subscribing

to newsletters, submitting a form, survey and questionnaire and/or opting in Research Panel). You have the right to withdraw your consent at any time.

- **Legitimate Interest:** For purposes such as improving our services and enhancing user experience.
- **Contractual Necessity:** When processing is necessary to fulfill a contract with you.
- **Legal Obligation:** When required to comply with applicable laws.

## 5. Sharing Your Information

We may share your personal data with:

- **Legal Authorities:** When required by law or to protect our legal rights.
- **Business Transfers:** In connection with a merger, sale, or transfer of all or part of our business.
- **Our Clients:** Where you participate in our surveys or interviews, we may disclose your professional identifiers together with insights, as part of research deliverables provided to our Clients. We will not disclose your personal contact details unless you have given us explicit consent.
- **Service Providers:** We engage third-party companies to support our operations, including but not limited to cloud hosting, analytics, natural language processing, survey infrastructure, and incentive delivery. Our current key service providers include Microsoft Azure (cloud hosting), OpenAI (text analysis and summarization services), and Tremendous (incentive delivery). This list is not exhaustive, and the service providers we rely on may change over time. Any updates to the list of key providers will be reflected on this page. We only share the minimum necessary data with such providers. Where feasible we apply

redaction of identifiers, and all providers perform processing under written data protection terms which contractually prohibit data use beyond the services provided

- Other third parties with your explicit consent.

## **6. Data Retention**

We will retain your personal data as long as necessary to fulfill the research purposes described in this Privacy Policy. In particular:

- Respondent Data are retained until the completion of the research project and the delivery of results to our Clients, plus any additional period required under applicable tax, accounting, or legal obligations.
- Where you have consented to be included in our Research Panel for potential future projects, we will retain your professional identifiers (such as company/organization name and job title, and contact details) until you withdraw consent or request deletion.
- Anonymized or aggregated research data, which no longer permits identification of individual Respondents, may be retained for longer periods to support internal research quality, validation, or methodological improvement.

After the relevant period has expired, or upon withdrawal of consent, data will be securely deleted or irreversibly anonymized, unless retention for a longer period is required by law or to establish, exercise, or defend legal claims.

Withdrawal of consent does not affect the lawfulness of processing carried out before such withdrawal.

## **7. International Data Transfers**

Your personal data may be transferred to, stored, or processed in countries outside your jurisdiction, including within and outside the European Economic Area (EEA). Our current key transfer destinations include hosting

within the EEA (via Microsoft Azure) and specific processing functions in the United States (via OpenAI). Incentive distribution may involve processing in other jurisdictions by providers such as Tremendous. Where data is transferred outside the EEA, we implement appropriate safeguards, such as the European Commission's Standard Contractual Clauses (SCCs), to ensure your data is protected. The list of providers and transfer destinations is not exhaustive and may change over time. Any material updates will be reflected on this page.

## **8. Responsibilities of Respondents**

- 8.1 Respondents shall provide information and responses that are, to the best of their knowledge, accurate, complete, and not misleading.
- 8.2 We rely on the integrity of Respondents' information for the purposes of our research. We shall not be liable for any incorrect, incomplete, misleading, or concealed information provided by Respondents.
- 8.3 Where a Respondent knowingly provides false or misleading information, we reserve the right to exclude such responses from our research, and to take appropriate action to protect the integrity of our services and the interests of our Clients.

## **9. Your Rights**

Depending on your location, you may have the following rights under applicable data protection laws:

- **Access:** Request access to the personal data we hold about you.
- **Correction:** Request the correction of inaccurate or incomplete data.
- **Deletion:** Request the deletion of your personal data.
- **Restriction:** Request the restriction of processing your personal data.
- **Data Portability:** Request a copy of your data in a structured,

machine-readable format.

- **Objection:** Object to the processing of your personal data for certain purposes.
- **Withdrawal of Consent:** Withdraw your consent at any time.

To exercise your rights, please contact us at [requests@bellandholmes.com](mailto:requests@bellandholmes.com).

You also have the right to lodge a complaint with your local supervisory authority if you believe your data has been processed unlawfully.

## **10. Data Security**

We implement appropriate technical and organizational measures to protect your personal data against unauthorized access, loss, misuse, or alteration. However, no method of transmission over the internet or electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security. If we become aware of a data breach involving your personal data, we will notify you in accordance with applicable laws.

## **11. Children's Privacy**

Our Website is not directed to children under the age of 18. We do not knowingly collect personal data from children under 18. If you are under 18, please do not use this Website or submit any personal data to us. If we become aware that we have inadvertently collected personal data from a child under 18, we will delete such data as soon as possible.

## **12. Additional Rights for California Residents**

12.1 If you are a resident of California, you have certain additional rights under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA):

- The right to request disclosure of the categories and specific pieces of personal information we have collected, the sources of that information, and the purposes for collection;
- The right to request deletion of your personal information;
- The right to correct inaccurate personal information we maintain about you;
- The right to opt out of the sale or sharing of your personal information (if applicable);
- The right not to be discriminated against for exercising your rights under the CCPA/CPRA;
- The right to limit the use and disclosure of sensitive personal information as defined by California law.

## 12.2 Do Not Sell/Share.

We may engage in cross-context behavioral advertising with partners such as LinkedIn, which under California law may be considered a “share” of personal information. California residents may exercise their “Do Not Sell or Share My Personal Information” rights by contacting us at [requests@bellandholmes.com](mailto:requests@bellandholmes.com). We are in the process of implementing additional opt-out mechanisms, including recognition of Global Privacy Control (GPC) signals or a “Your Privacy Choices” link on our Website. We do not sell personal information for monetary compensation, and we do not use or disclose sensitive personal information for purposes other than those permitted by law.

## 13 Third-Party Links

Our Website may contain links to third-party websites. We are not responsible for the privacy practices or content of these websites. We encourage you to review the privacy policies of any third-party sites you visit.



## **14 Changes to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or for other operational reasons. Any updates will be posted on this page, and the “Last Updated” date at the top of this policy will be revised accordingly.

## **15 Contact Us**

If you have any questions, concerns, or complaints regarding this Privacy Policy, please contact us.

### **Bell & Holmes Research Ltd.**

**Email:** [requests@bellandholmes.com](mailto:requests@bellandholmes.com)

**Address:** Panagias Evangelistrias Street No. 89, 4156 Kato Polemidia – Limassol, Cyprus.

### **Supervisory Authority (for Cyprus):**

Office of the Commissioner for Personal Data Protection

Iasonos 1, 1082 Nicosia, Cyprus

Tel: +357 22818456

Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

Website: <https://www.dataprotection.gov.cy>