

Data Protection Policy

Document Owner: Rachel Richardson

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Introduction

Open Voice Lab Ltd is committed to handling personal data lawfully, transparently and securely. This policy sets out how we collect, use, store and protect personal data in the course of our work as a digital engagement consultancy.

We process personal data in a number of ways - including through survey and consultation tools, panel recruitment, client communications and the delivery of engagement programmes. This policy applies to all personal data processed by Open Voice Lab Ltd, whether held digitally or in hard copy.

Open Voice Lab Ltd is registered with the Information Commissioner's Office (ICO) as a data controller.

ICO Registration Number: ZC131738

Scope

This policy applies to:

- All directors and employees of Open Voice Lab Ltd
- Any associates, contractors or third parties working on behalf of Open Voice Lab Ltd
- All personal data processed by Open Voice Lab Ltd in connection with its business activities

Legal framework

This policy is written in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Privacy and Electronic Communications Regulations (PECR)
- ICO guidance and codes of practice

Data protection principles

Under UK GDPR, all personal data must be:

- Processed lawfully, fairly and transparently - individuals must know how their data is being used
- Collected for specified, explicit and legitimate purposes - data must not be used in ways incompatible with those purposes

- Adequate, relevant and limited - we only collect what we actually need
- Accurate and kept up to date - we take reasonable steps to ensure data is correct
- Kept no longer than necessary - we retain data only for as long as there is a legitimate reason to do so
- Processed securely - we protect data against unauthorised access, loss or destruction

Open Voice Lab Ltd is accountable for compliance with these principles and can demonstrate that compliance where required.

Lawful basis for processing

We will always identify and document a lawful basis before processing personal data. The lawful bases we are most likely to rely on are:

- Consent - where individuals have freely given, specific and informed agreement to their data being processed, for example when signing up to a community panel or mailing list
- Contract - where processing is necessary to fulfil a contract, for example with a client or associate
- Legitimate interests - where processing is necessary for our legitimate business interests, provided those interests are not overridden by the rights of the individual
- Legal obligation - where processing is required by law

Where we process special category data - including data about health, disability, ethnicity, religion, sexual orientation or other protected characteristics - we will identify an additional condition for processing under Article 9 of UK GDPR. In the context of our work, this will most commonly be:

- Explicit consent from the individual
- Substantial public interest where we are supporting public sector engagement and consultation activity

Types of personal data we process

In the course of our work, Open Voice Lab Ltd may process the following types of personal data:

Contact and identity data

Names, email addresses, postal addresses and telephone numbers - for example of clients, associates, panel members and event attendees.

Professional data

Job titles, organisations and professional backgrounds - for example of stakeholders involved in engagement activity.

Survey and consultation responses

Views, opinions and feedback gathered through surveys, consultations and engagement activities delivered on behalf of clients. Where possible, these are collected anonymously.

Equality monitoring data

Special category data collected through equality monitoring questions on surveys - including age, disability status, ethnicity, gender, religion or belief, and sexual orientation. This data is always collected on an optional basis with a clear privacy notice explaining its purpose.

Panel and network data

Names, contact details and relevant background information for individuals who have signed up to participate in community panels or networks facilitated by Open Voice Lab Ltd on behalf of clients.

Financial and contractual data

Invoice details, bank information and contractual records relating to clients and suppliers.

How we collect personal data

We collect personal data through:

- Direct contact from clients, associates and enquirers
- Online survey and consultation platforms
- Panel and network sign-up forms
- Email and telephone communications
- Event registration processes

We do not purchase personal data from third parties or use data collected for one purpose for an unrelated purpose without informing individuals and, where required, obtaining fresh consent.

Special category data

Open Voice Lab Ltd handles special category data primarily in the context of equality monitoring on surveys and consultations. We treat this data with the highest level of care and apply the following safeguards:

- Special category data is always collected on an optional basis
- A clear privacy notice is provided at the point of collection explaining what the data will be used for, who will see it, and how it will be stored
- Equality monitoring data is used to analyse response patterns across different equality groups - for example to identify whose views are underrepresented or where particular communities have distinct needs. This analysis is conducted on a strictly need-to-know basis and findings are always reported at a group level, never in a way that could identify individual respondents
- Special category data is never used to identify or contact individuals
- Access to unaggregated special category data is strictly limited to those who need it for legitimate purposes

Data sharing

Open Voice Lab Ltd will only share personal data with third parties where:

- The individual has given consent
- It is necessary to deliver a contracted service
- We are required to do so by law

Where we share data with third parties - for example survey platform providers or associate consultants - we ensure that appropriate data processing agreements are in place and that those parties meet the required standards of data protection.

We do not sell personal data to any third party under any circumstances.

Data handover and project close-down

Where Open Voice Lab Ltd processes personal data on behalf of a client in the course of delivering an engagement or consultation project, the client may act as the data controller for that data. In these circumstances, Open Voice Lab Ltd acts as a data processor and will process data only in accordance with the client's instructions and the terms of our contract.

At the close of a project, where a client requires personal data to be transferred to them
- for example consultation responses, panel member details or equality monitoring data
- we will:

- Transfer data securely, using an agreed and appropriate method
- Confirm in writing what data has been transferred and when
- Delete our own copies of that data once transfer has been confirmed, unless we are required to retain it for legal or contractual reasons
- Ensure any transfer is documented in our project close-down records

Where a client requires data to be transferred to a third party for continuation of a project - for example a new contractor taking over delivery - Open Voice Lab Ltd will seek written confirmation from the client that the transfer is authorised before proceeding.

We will not retain personal data collected on behalf of a client beyond the close of a project unless there is a specific and documented reason to do so, and the client has been informed.

All data handovers will be recorded in our project log and retained for a minimum of three years.

Data retention

We retain personal data only for as long as is necessary for the purpose for which it was collected. Our standard retention periods are:

Type of data	Retention period
Client contact and contractual data	6 years from end of contract (for legal and financial compliance)
Survey and consultation responses	As specified in the project privacy notice - typically deleted or anonymised within 12 months of project close
Panel and network member data	For the duration of the panel, plus 12 months - or until the individual withdraws consent
Financial records	6 years in accordance with HMRC requirements

Job applicant data	6 months from the end of the recruitment process
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When data reaches the end of its retention period it is securely deleted or anonymised.

Data security

Open Voice Lab Ltd takes the security of personal data seriously. Our security measures include:

- Use of password-protected
- We are in the process of ensuring all work devices are encrypted
- Use of secure, reputable cloud storage and software platforms
- Strong password policies and use of two-factor authentication where available
- Limiting access to personal data to those who need it for their work
- Ensuring associates and contractors are bound by confidentiality obligations
- Regular review of the platforms and tools we use to ensure they meet appropriate security standards

In the event of a data breach, we will follow our Data Breach Response Procedure, which includes notifying the ICO within 72 hours where the breach is likely to result in a risk to individuals' rights and freedoms, and notifying affected individuals where required.

Individual rights

Under UK GDPR, individuals have the following rights in relation to their personal data:

- Right to be informed - to know how their data is being used
- Right of access - to request a copy of the data we hold about them
- Right to rectification - to ask us to correct inaccurate data
- Right to erasure - to ask us to delete their data in certain circumstances
- Right to restrict processing - to ask us to limit how we use their data
- Right to data portability - to receive their data in a portable format
- Right to object - to object to processing based on legitimate interests or for direct marketing
- Rights related to automated decision-making - to not be subject to decisions made solely by automated processing where those decisions have a significant effect on them

For full details of how to make a Subject Access Request and how we will handle it, please see our Subject Access Request Policy.

To exercise any of these rights, individuals should contact us at info@openvoicelab.co.uk. We will respond within one calendar month.

Cookies and website data

We have a [cookie policy](#) and [privacy statement](#) available on our website.

Data protect lead

As a small consultancy, Open Voice Lab Ltd does not currently meet the threshold requiring a formally appointed Data Protection Officer. However, overall responsibility for data protection sits with the Directors, who are the first point of contact for any data protection queries, concerns or requests.

As our business grows, and in particular if we take on larger scale projects involving significant volumes of special category data, we will review whether a formally appointed Data Protection Officer becomes necessary.

Data protection contact: info@openvoicelab.co.uk

Training and awareness

All directors and associates working on behalf of Open Voice Lab Ltd are expected to be familiar with this policy and to handle personal data in accordance with it. Data protection awareness is included in our onboarding process for new associates.

Breaches and complaints

If you believe Open Voice Lab Ltd has mishandled your personal data, please contact us in the first instance at info@openvoicelab.co.uk. We will investigate and respond within one calendar month.

If you are not satisfied with our response, or if you believe we are processing your data unlawfully, you have the right to lodge a complaint with the ICO:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel: 0303 123 1113

Website: ico.org.uk

Details of how to submit a Subject Access Request are set out in our accompanying Subject Access Request Policy.

Policy review

This policy will be reviewed annually, or sooner if there are significant changes to our activities, the tools we use, or the legal framework governing data protection.

Approval

Signed: Rachel Richardson

Position: Director

Date: 25 April 2026