

Texture AI - Privacy Policy

About us

Texture AI is made up of a team of academics and practitioners from the worlds of psychology, AI and media. Together we are driving profound innovation across the media sector and beyond.

Data is our business. We gather data and apply cutting edge analytics tools to it in order to give businesses and governments deeper insights into human behaviour and the actions which impact it.

Introduction

Texture AI understands the importance of data and is committed to protecting personal data collected in the course of our work. This privacy policy explains what personal data we collect and how we use it, along with your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please note that sections 1 and 6 - 11 apply to all types of personal data covered by this privacy policy.

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1. IMPORTANT INFORMATION AND WHO WE ARE

- **Purpose of this privacy policy**

This privacy policy aims to give you information on how Texture AI collects and processes your personal data. You should read this privacy policy alongside any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

- **Controller**

Texture AI Ltd (a limited company incorporated and registered in England and Wales with company number 10700428) is the controller and responsible for your personal data (referred to as "**Texture AI**", "**we**", "**us**" or "**our**" in this privacy policy). We are registered with the Information Commissioner's Office under registration number ZA704392.

- **Data protection officer**

We have appointed a data protection officer ("**DPO**") who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights [LINK], please contact the DPO by emailing data.requests@texture.ai.

- **Your right to make a complaint**

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

- **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

- **Third-party links**

Our website at texture.ai (the "**Website**") may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. INFORMATION FOR SURVEY PARTICIPANTS

- **The Data We Collect About You**

"Personal data", or "personal information", means any information about an individual from which that person can be identified. It does not include aggregated data from which it is not reasonably possible to identify the individuals to whom it relates.

When you participate in a survey we are conducting we may collect, use, store, analyse and transfer any personal data about you that you provide to us through the survey, including any personal data we create by analysing your answers to survey questions. Our survey participants are asked to answer questions about their personality traits and decision-making habits, how they relate to others and the society they live in, and their exercise and consumption habits. They will also answer questions about their opinions of their health care system, global events, of mainstream media, as well as other outcomes which may be added later if we deem they become relevant. Additionally, they will be asked questions about their experiences with and opinions of the COVID-19 pandemic and government responses to it. In this privacy policy we refer to the personal data we collect through surveys as "**Survey Participant Data**".

We will analyse Survey Participant Data so that we can create measures related to survey participants' personality traits, behaviours, and opinions. We will not share any of this information with any third party, except for the names, email addresses and postcodes of our survey respondents, which we share with Facebook, Inc. ("**Facebook**") (see How We Use Survey Participant Data [LINK] below for more information). We may also share the names, email addresses and postcodes of survey respondents with other social media platforms (e.g. Twitter, LinkedIn, Reddit, TikTok, YouTube, and Instagram), but only with the consent of those survey participants.

- **Aggregated Data**

We also create, collect, use and share "**Aggregated Data**" such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as it does not directly or indirectly reveal your identity.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

- **Special category data**

We may on occasion collect, use, analyse and process “special category data” from or about you through your answers to our survey questions. This could include personal data which reveals your race or ethnicity, religious or philosophical beliefs, sex life, political opinions, and information about your health).

We do not collect any information about criminal convictions and offences.

- **How We Use Survey Participant Data**

We aggregate personal data provided to us through survey responses, then analyse it in order to predict trends in human behaviour. We do this on the basis of your express consent given to us when you sign up to participate in our surveys.

We also provide certain Survey Participant Data to Facebook Ads Manager. Specifically, this process involves identifying survey participants in our database with specific psychological and behavioural traits and opinion profiles that are of interest to our clients (a ‘seed sample’). Using the Facebook Ads Manager platform, we then provide Facebook with the names, email addresses and postcodes of the survey participants from the seed sample. Facebook then uses this data to provide a sample of Facebook users who, through its lookalike targeting system, it identifies as being similar to the seed sample we provided. We then use this new sample of Facebook users as a target audience for our clients’ communications and advertisements.

We may also, with your consent, share the names, email addresses and postcodes of survey respondents with other social media platforms (e.g. Twitter, LinkedIn, Reddit, YouTube, TicToc, and Instagram), but we will also ensure that we have obtained your consent before doing so.

We do not share Survey Participant Data with our clients. Our clients will also not see the personal identifiable information of the new sample of Facebook (or other social media platform) users. At no point do we share any of your psychological, behavioural, or opinion data with Facebook or any other social media platform. Further, survey participants themselves will not be targeted with our clients’ communications and advertisements – the seed sample sent to Facebook and other social media platforms will only be used by Texture AI and the social media platforms to generate new audiences of social media users that are likely to have similar psychological, behavioural, and/or opinion profiles as those survey participants included in the seed sample. Individuals in these new audiences are the ones that will receive our clients’ communications and advertisements - not our survey participants.

- **Legal Basis for Processing Survey Participant Data**

We process Survey Participant Data with the express consent of the survey participants.

- **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

- **Disclosures of Survey Participant Data**

- As explained above, we share the names, email addresses and postcodes of survey participants with Facebook (based in the U.S.) and certain other social media platforms such as Twitter, LinkedIn, YouTube, TikTok, Reddit and Instagram. The social media platform, acting in its capacity as a data processor, then uses this data to provide our clients with a sample of social media users who, through its lookalike targeting system, it identifies as being similar to the seed sample of survey respondents that we provided. We have an agreement in place with Facebook and the other social media platforms with whom we share personal data which contains undertakings and assurances from them in order to give your personal data the same protection it has in the UK. If you would like further information about the mechanism used to protect your personal data when transferred to Facebook or to other social media platforms please contact us by emailing data.requests@texture.ai.
- Please see Section [7] “Disclosures of Your Personal Data” below for more information about how we share your personal data.

3. **INFORMATION FOR SOCIAL MEDIA USERS (PUBLIC DATA)**

- **The Data We Collect About You**

“Personal data”, or “personal information”, means any information about an individual from which that person can be identified. It does not include aggregated data from which it is not reasonably possible to identify the individuals to whom it relates.

We may collect, use, store, analyse and transfer personal data from publicly available tweets made by users on Twitter, and posts made by users on public Facebook, Instagram, Reddit, and LinkedIn pages. We also collect publicly available posts from users of news websites (e.g., comments on news articles). We use this data to analyse and predict trends in public opinions and predict human behaviour in relation to various matters of interest to us and our clients. This type of information (collectively “**Public Social Media Data**”) could include: text and images from public social media posts and the meta-data associated with it (e.g. name, location, time of posting, and user ID). For example, during the final presidential debate between Joe Biden and President Trump in 2020 our algorithm analysed 238,000 tweets to predict how Twitter users felt about the two candidates.

- **Aggregated Data**

We also create, collect, use and share “**Aggregated Data**” such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as it does not directly or indirectly reveal your identity. For example, we may aggregate data regarding tweets concerning a particular company in order to analyse public opinion of that company.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

- **Special category data**

We may collect, use, analyse and process “special category data” from or about you. “Special category data” is personal data which reveals your race or ethnicity, religious or philosophical beliefs, sex life, political opinions, and information about your health). We may collect this type of data from posts, tweets or comments you make on public social media platforms. For instance, our algorithms may collect and analyse data from tweets on Twitter in order to assess political opinions on various topics, or from Facebook in order to predict behavioural trends around public health matters, such as COVID-19.

We do not collect any information about criminal convictions and offences.

- **How We Use Public Social Media Data**

We aggregate the personal data we obtain from posts on social media platforms such as Twitter, then analyse it in order to identify and predict trends in public opinion and human behaviour. We have a legitimate interest in using Public Social Media Data for this purpose where your interests and fundamental rights do not override those interests. Once the data is aggregated, we anonymise it before transferring it to our clients, so from that point it is no longer possible to link you personally to the data (and so it stops being “personal data”).

More generally, we may also use your personal data where it is necessary in order to comply with a legal obligation, or in order to perform a contract we have with you or take steps at your request before entering into such a contract, or where we identify that it is necessary to do so for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

The term “**legitimate interest**” means our interest in conducting and managing our business to enable us to give our clients the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). If you would like further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities, please contact our DPO by emailing data.requests@texture.ai.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

- **Legal basis for processing special category data**

When we collect, use, analyse and otherwise process your special category data from publicly available posts, tweets or comments made on social media platforms such as Twitter and Facebook, we do so on the basis that you have manifestly made such personal data public.

- **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. INFORMATION FOR CLIENTS AND SUPPLIERS

- **The Data We Collect About You**

“Personal data”, or “personal information”, means any information about an individual from which that person can be identified. It does not include aggregated data from which it is not reasonably possible to identify the individuals to whom it relates.

We may collect, use, store and transfer personal data relating to individuals who work for or otherwise represent our clients, customers and suppliers, such as an individual’s full name, title, work address and email address, job title, gender and telephone number(s) (“**Client/Supplier Data**”).

We do not collect or process special category data or information about criminal convictions and offences from individuals who work for or otherwise represent our clients, customers or suppliers.

- **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with a client or supplier, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with the client or supplier. In this case, we may have to cancel a product or service but we will notify you if this is the case at the time.

- **How We Use Your Personal Data**

We use Client/Supplier Data in order to communicate with our clients and suppliers. We have a legitimate interest in using Client/Supplier Data for this purpose. We may also use Client/Supplier Data in order to comply with a legal obligation.

The term “**legitimate interest**” means our interest in conducting and managing our business to enable us to give our clients the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). If you would like further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities, please contact our DPO by emailing data.requests@texture.ai.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

- **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. INFORMATION FOR WEBSITE VISITORS

- **The Data We Collect About You**

We may collect, use, store, analyse and transfer personal data we obtain from you through our Website such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website (“**Website Visitor Data**”). The Website is not intended for children and we do not knowingly collect data relating to children.

We may create, collect, use and share **Aggregated Data** such as statistical or demographic data using Website Visitor Data. Aggregated Data may be derived from your personal data but is not considered personal data in law as it does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

- **How We Use Your Personal Data**

We use Website Visitor Data in order to support the operation of our Website. We may on occasion also use it to detect or prevent fraud or crime. We have a legitimate interest in using Website Visitor Data for this purpose where your interests and fundamental rights do not override those interests. We may also use Website Visitor Data in order to comply with a legal obligation to which we are subject.

The term “**legitimate interest**” means our interest in conducting and managing our business to enable us to give our clients the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). If you would like further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities, please contact our DPO by emailing data.requests@texture.ai.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

- **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. **MARKETING**

You may receive marketing communications from us if you have requested information from us, signed up for our newsletter, or purchased our services, and you have not opted out of receiving that marketing. In the course of communicating with you regarding marketing we

may collect and process your preferences in receiving marketing from us and our third parties and your communication preferences.

We will not use personal data which we have obtained from survey participants, or from social media users, to send marketing communications to survey participants or users of social media platforms.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or by contacting us at any time.

7. DISCLOSURES OF YOUR PERSONAL DATA

This section applies to all personal data covered by this privacy policy.

We may share your personal data with the parties set out below for the purposes set out above [LINK].

- Service providers, such as Amazon Web Services (AWS), acting as processors based in the United Kingdom and Ireland who provide data storage services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

For further detail about how we disclose Survey Participant Data, please see the Survey Participant Data [LINK] section above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

8. INTERNATIONAL DATA TRANSFERS

This section applies to all personal data covered by this privacy policy.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- The country to which your personal data is transferred has been deemed to provide an adequate level of protection for personal data by the ICO; or
- The third party has entered into a contract with us which contains undertakings and assurances from them in order to give your personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Further detail regarding the transfer of certain personal data obtained from survey participants can be found here. [LINK] international transfers sec 2

9. DATA SECURITY

This section applies to all personal data covered by this privacy policy.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. DATA RETENTION

This section applies to all personal data covered by this privacy policy.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see below [LINK] (your legal rights) for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Below we set out our data retention policies with regard to each personal data category outlined above. The retention policies below only apply to personal data; anonymised data or aggregated statistically summaries of data are not “personal data”, and may be kept in perpetuity.

- **Survey Participant Data** will be kept for a period of 2 years from the date of collection on the basis of your consent to participate. After this, survey participants will be offered the chance to opt out on a biennial basis. Personal data from any participant who chooses to opt out will be permanently deleted.
- **Public Social Media Data** will be kept for a period of 7 years from the date of collection and then permanently deleted. If you want to know whether we possess your Public Social Media Data, contact us at data.requests@texture.ai. If we possess your data and you wish to opt out, we will permanently delete your data.

- **Client/Supplier Data** will be kept for a period of 7 years from the date of last contact with Texture AI, and then permanently deleted.
- **Website User Data** will be kept for a maximum period of 1 year and then permanently deleted.

11. YOUR LEGAL RIGHTS

This section applies to all personal data covered by this privacy policy.

Under certain circumstances, you have rights under data protection laws in relation to your personal data as described below.

- **Right to request access** to your personal data (commonly known as a "data subject access request"). This enables you to request a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Right to request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Right to object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Right to request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to request the transfer** of your personal data to you or to a third party. Where relevant, we will provide to you, or a third party you have chosen, your personal data in a structured,

commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Right to withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our DPO by emailing data.requests@texture.ai.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.