

PRIVACY & COOKIE POLICY FOR SURVEYS ("Policy")

Introduction

This survey forms part of the "Study on Conversion Practices against LGBTIQ+ persons" commissioned by the European Commission. The purpose of the study is to improve understanding of the forms, settings, impacts, support needs and policy responses relating to conversion practices across the European Union.

Verian conducts research on behalf of the European Commission, Directorate-General for Justice and Consumers (DG JUST), which is the data controller. Regulation (EU) 2018/1725 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (EUDPR) applies to the processing of personal data for this study. Any contracted third parties or suppliers supporting the study act as processors or sub-processors, as applicable, and are required to process personal data only in accordance with DG JUST's instructions and the applicable contractual and security requirements. Verian acts as a data processor on behalf of DG JUST under the obligations provided for in UK GDPR and the DPA 2018.

This survey seeks to gather the perspectives of professionals who may encounter, address, regulate, monitor or provide support relating to conversion practices.

Survey respondents may separately agree to take part in follow-up interviews. Participants selected for these activities will receive additional participant information and a separate informed consent form before taking part.

For the purpose of this Policy, the definition of 'personal data' is information which relates to and can identify a living individual and/or a specific household.

Lawful collection and use

This Policy explains how the personal data you provide when taking part in an online, face to face, postal or telephone survey is collected, stored and used.

When surveys are conducted, interviewers/invitations/platforms and questionnaires clearly identify Verian and explain the purpose(s) of our contact and if applicable, the purpose for our collecting your personal data. You may decline to answer any questions or withdraw from participation in a survey at any time.

Contact generally made in person, by telephone, by email or by post may be made for any of the following purposes:

Case	Purpose	Data collected/processed	Legal Basis
Invitation to participate in the professional survey	To invite professionals with relevant expertise or experience to participate in the study and contribute evidence on conversion practices.	Name, organisation, professional role, contact details, country.	Article 5(a) EUDPR: processing is necessary for the performance of a task carried out in the public interest.
Professional survey research	To understand awareness, identification, regulation, prevention and responses to conversion practices across professional sectors and Member States.	Professional role, sector, country, professional experience, views on legal and policy frameworks, experiences with cases, knowledge of support systems and professional perspectives.	Article 5(d): consent.
Further research and expert follow-up	To re-contact respondents for additional research activities, clarification of responses, stakeholder interviews, or future consultation activities related to the study.	Contact details, professional profile, previous survey participation information.	Article 5(d): consent.
Analysis and development of recommendations	To combine survey findings with legal review, stakeholder interviews and other research activities in order to support evidence-based recommendations.	Survey responses, professional expertise, policy and practice perspectives.	Article 5(d): consent.
Survey administration and quality assurance	To administer the survey, maintain data quality, optimise the participant experience and detect duplicate submissions.	Technical metadata generated through the survey platform, such as date/time stamps and system information required for survey administration.	Article 5(a) EUDPR: processing is necessary for the performance of a task carried out in the public interest.
Re-contact regarding data protection requests or study	To respond to requests relating to personal data, participation,	Contact details, participant identifier and correspondence	Article 5(d): consent.

participation	withdrawal, correction of information or other rights under data protection legislation.	relating to the request.	
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Verian will never misrepresent ourselves or what we are doing. If you receive an email that concerns you, purporting to be from Verian, please let us know as shown below in 'How to contact us'.

You have been contacted to take part in a survey online by

- Receiving your contact details from the client we are conducting the survey for, with whom you may generally dealt with
- Sourcing your information from other publicly available resources

Or

- You have previously agreed to be re-contacted to possibly participate in further surveys
- You proactively clicking on a link you've seen online or has been shared with you through EU-level or national NGOs you are affiliated with or in contact with to participate in one of our surveys

Professional participation

Participation is voluntary and intended for individuals participating in a professional capacity. Respondents should not disclose identifiable information about patients, clients, colleagues or individual cases. Open-text responses and quotations will be reviewed and anonymised before use in reporting, particularly where unusual circumstances, small participant groups or detailed contextual information could make someone identifiable.

Responses will be analysed alongside findings from the legal review, stakeholder interviews and other components of the study in order to support evidence-based recommendations. Results will be reported in aggregated or anonymised form unless explicit permission has been obtained.

Third parties and data transfer across borders:

Personal data is collected and processed for the purposes described above but is not shared or sold to any third parties, unless it is required by law, or you have agreed otherwise.

The study will use Forsta for the survey, Recollective for the Asynchronous Online Community, Microsoft Teams for interviews and online meetings, and Verian Brussels SharePoint for secure internal storage. Personal data will be hosted within these platforms and the Verian Brussels SharePoint environment. Access will be limited to authorised Verian Brussels staff, DG JUST staff, relevant research partners and

approved suppliers strictly on a need-to-know basis. No personal data will be transferred outside the EU. Interviews may be recorded for the sole purpose of transcripts (no audio-video recordings) with the participants' agreement; recorded transcripts will be stored on Verian Brussels SharePoint for internal study use only.

Confidentiality, security and industry requirements:

All processing operations are carried out pursuant to [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission, and by the confidentiality obligations deriving from the General Data Protection Regulation ('GDPR' - [Regulation \(EU\) 2016/679](#)). The processors have to put in place appropriate technical and organisational measures to ensure the level of security, required by the Commission. In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

All third-party contractors, site service providers and employees are contractually obliged to follow our policies and procedures regarding confidentiality, security and privacy.

Copilot or equivalent AI-supported tools may be used to support synthesis and analysis of study material, subject to human review and Verian's internal AI policy. AI tools will not be used to make automated decisions about participants, and personal data will not be used to train external AI models.

Your survey responses in a given survey are combined with the responses of all others who participate and report those combined responses to the client that commissioned the study, unless one or more of the following criteria are met.

For qualitative activities, findings will also be reported in anonymised form. Direct quotations or written contributions may be used only after details that could identify a participant have been removed or altered.

The only exceptions when your personal data or survey responses may be disclosed to third parties are as follows:

- You request or consent to sharing your identifying information and/or individual responses with a third party for a specified purpose;
- When your responses are provided to a third-party processor who is

contractually bound to keep the information disclosed confidential and use it only for research or statistical purposes;

- Where such disclosure is required by law or under exceptional circumstances such as for safeguarding reasons.

Survey findings will be reported only in aggregated or anonymised form. Direct quotations and open-text responses may be used in reports and publications only after anonymisation, including removal or alteration of details that could identify a participant because of unusual circumstances, small participant groups or contextual information.

Please avoid providing names or identifying information in open-text responses wherever possible. The only exception is where the survey explicitly requests contact details for follow-up purposes, in which case respondents may provide their own contact information. Professionals completing the survey should not disclose identifiable information about patients, clients, colleagues or individual cases.

Cookie disclosures (only for online survey participants):

Cookies are small text files stored on your computer or device by a website that assigns a numerical user ID and stores certain information about your online browsing. They are used by web developers to help users navigate their websites efficiently and perform certain functions. The website sends information to the browser which then creates a text file. Every time the user goes back to the same website, the browser retrieves and sends this file to the website's server.

No additional cookies, IP-address checks or similar tracking technologies are currently planned beyond those strictly necessary for the operation, security and administration of the relevant survey or online platforms. Where a platform (i.e. Microsoft Teams) uses cookies or technical identifiers that are necessary for its functioning, these will be described in the relevant platform information or privacy notice.

As is true of most online surveys, certain information is automatically gathered and stored in survey data files. This information may include things like Internet Protocol address (IP address), browser type, Internet Service Provider (ISP); referring/exit pages, operating system, and date/time stamp.

Technical information may be generated by Forsta platform. This may include date/time stamps, browser or system information, or other technical information required for platform operation and will be used only to administer the study, maintain security and support data quality, in line with DG JUST's instructions as controller.

Children's data collection:

Participation in both surveys is restricted to persons aged 18 years and over. No data are intentionally collected from children under the age of 18 years.

Sensitive data collection:

Providing this information is entirely voluntary. You may choose not to answer any question.

The study is carried out for DG JUST's public-interest task under Article 5(a) EUDPR and will be analysed in aggregated and anonymised form. No attempt will be made to identify participants through their survey responses.

Follow-up interviews and online communities

Following completion of the survey, participants may be invited to express interest in further research activities, i.e. interviews.

Participation in such activities is entirely optional and is not required to complete the survey.

Any contact information collected for follow-up research will be stored separately from survey responses and will only be used where explicit consent has been provided.

Any consent options for sensitive-data processing, interviews, participation or future contact will require a separate active choice and will not be pre-ticked.

Participants selected for an interview will receive activity-specific participant information and a separate consent form describing the relevant processing.

Rights of individuals:

To request access to personal data that we hold about you, you should submit your request in writing to the e-mail address or postal address shown below in "How to Contact Us". When you make a request, you should indicate your response ID or other survey or interview identifier (e.g. from an email you may have received or shown at the completion of the survey).

You may request the withdrawal of your participation and the deletion of your personal data at any time. Your personal data will be stopped from processing and deleted where possible, except where the data have already been anonymised and integrated into aggregated analysis, study findings or reporting outputs and can no longer be linked to you.

Depending on the legal basis upon which your personal data is collected, your

rights in relation to your personal data include:

- Right to change your mind and to withdraw your consent
- Right to access your personal data
- Right to rectify your personal data
- Right to erase your personal data from our systems, unless there are legitimate interest reasons for continuing to process the information
- Right to port your personal data (portability right)
- Right to restrict processing of your personal data
- Right to object to the processing of your personal data
- Right to not be discriminated against for exercising any of the rights available to you under applicable data protection laws

If necessary, any other parties such as our suppliers or service providers to whom we have transferred your personal data will be notified of any changes made when you make a request. Note that while we communicate to these third parties, we are not responsible for the actions taken by these third parties to answer your request. You may be able to access your personal data held by these third parties and correct, amend or delete it where it is inaccurate.

Accuracy:

All reasonable steps are taken to keep your personal data accurate, complete, current and relevant, based on the most recent information provided to us. If you would like to update your personal data, please contact us using the details provided below.

The accuracy, completeness and currency of personal data rely on respondents providing honest and accurate information and notifying the data controller of any updates or changes to their personal data.

Data storage and retention:

Personal data will be kept only for as long as necessary for the purposes of the study and in accordance with the instructions of DG JUST as controller. The applicable version of the Commission's Common Retention List, SEC(2025)600, determines the retention periods for data and documents created or collected by the Commission in the course of the study, including for sensitive data where applicable.

During the performance of the contract, Verian will retain personal data only for the period necessary to carry out the study and in line with DG JUST's instructions, the contract and Verian's internal retention requirements, i.e. maximum retention period of one year unless DG JUST's written instructions require otherwise. At the end of the contract, identifiable or pseudonymised personal data will be deleted, returned or retained only in accordance with DG JUST's documented instructions and any applicable contractual requirements. Where deletion is required, confirmation of deletion will be provided to the data subject.

Automated decision making / profiling:

No automated decision-making or profiling will be used to make decisions about participants. AI-supported synthesis may be used only to assist analysis and reporting, subject to human review.

How to contact us:

If you have questions about this study or the processing of your personal data, you may contact Verian at Compliance@veriangroup.com. DG JUST is the controller for this study. You may also contact the relevant European Commission contact points:

The Data Controller:

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, JUST-LGBTI@ec.europa.eu

The Data Protection Officer (DPO) of the Commission:

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

Complaints and country specific disclosures:

If you are not satisfied with how your personal data are handled, you may contact the European Data Protection Supervisor.

The European Data Protection Supervisor (EDPS):

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the data controller.