

PRIVACY POLICY OF PARTNERING REGENERATION DEVELOPMENT LTD (PRD)

Last reviewed July 2024

1 INTRODUCTION

PRD recognises the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679 adopted 27 April 2016). Although the EU GDPR no longer applies directly in the UK since Brexit, its principles still apply through the UK's Data Protection Act 2018 and the amended UK GDPR. These laws together form the UK's post-Brexit data protection regime, which closely mirrors the EU GDPR. PRD complies with these UK regulations and has measures in place to maintain data access even if the UK-EU data adequacy agreement ends.

Specifically, the GDPR principles require that personal information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage.

2 WHO WE ARE

PRD offers substantial expertise in partnership development, stakeholder management, property development, the built environment and socioeconomic regeneration.

As part of its work, PRD is sometimes required to collect and use certain types of information about individuals who come into contact with the organisation. PRD also undertakes community engagement activities and events to support and inform wider projects and ensure local people have a voice in the future of the places they live and work.

This personal information must be handled properly irrespective of how it is collected, recorded and used—whether on paper, in a computer, or recorded on other material—in line with the Data Protection Act 2018..

3 INFORMATION WE COLLECT

How do we collect information from you?

Community engagement

As part of community engagement, Information is collected from you, as the service user, via a range of platforms including questionnaires, registration forms and mailing lists. You will always be asked if you consent to provide your information. Providing personal information is not a prerequisite for participating in engagement activities. This information will be collected from you directly as the data subject.

Our website

You may supply us with information about yourself when you fill in the 'contact us' form on our website.

With regard to each of your visits to our website, we may automatically collect information (via Google Analytics) including the following:

- Technical information, including a truncated and anonymised version of your Internet protocol (IP) address, browser type and version, operating system and platform;
- Anonymised information about your visit, including what pages you visit, how long you are on the site, how you got to the site (including date and time); page response times, length of visit, what you click on, documents downloaded and download errors.

What type of information is collected from you?

Community engagement

To support community engagement, we collect and process a range of information about you. Examples of the data we will ask you for include surname, forename, title, age, ethnicity, and other demographics, address, postcode, e-mail, and phone number. This enables us to:

- Invite you to participate in community engagement events and activities
- Thank you for your participation
- Feedback to you on the outcomes of projects you have participated in
- to track participation and in situations like panels and ensure they are representative.

Whenever we ask for personal data about you, we will ask for your consent to store and use that data.

Our website

The information you give us when you visit our website may include your name and e-mail address.

How long do we store your information?

In accordance with Article 5 of the GDPR, personal data will be kept for no longer than is necessary for the purpose for which it is being processed.

Community engagement

The duration that PRD will hold information related to community engagement will be dependent on the length of the project.

Our website

We do not keep a central database of email addresses or store email addresses for marketing purposes.

Website browsing data collected by Google Analytics is stored as per Google Analytics' own policy. PRD's view of this data is anonymised/not traceable to an individual.

4 HOW WE MAY USE THE INFORMATION WE COLLECT

Community engagement

All information provided in the context of designing and delivering community engagement is used by PRD for the purposes of enabling your participation. This includes:

- Inviting you to participate in engagement events and activities
- Statistical analysis and service planning
- Responding to enquiries and other matters
- Providing you with updates about projects, where you have requested to be kept informed.

Our website

We use contact information submitted via the 'contact us' form to provide you with information and/or services that you request from us.

We use Google Analytics website statistics to understand visits to our site; administer our site; review and how well the site is functioning in terms of user journeys and time spent on the site; and check for security issues.

What is the lawful basis for processing the information?

The lawful basis for processing your information is by the consent you have given to use information to facilitate participation in community engagement. Examples include registering for an event, completing a survey or joining a mailing list.

5 WHO HAS ACCESS TO THE DATA WE COLLECT

We will use all reasonable efforts to ensure that your personal data is not disclosed to regional/national institutions and authorities, unless required by law or other regulations.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our sites, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access, and any exchanges of information carried out once we are in receipt of your data will be done securely.

In the event of breach, or suspected breach, we will notify you and any applicable regulator of a breach where we are legally required to do so.

Any personal data provided in paper format, for example hard copy questionnaires, is stored securely in a locked cabinet. Once it has been transferred to a digital format the paper copy is shredded. The digital format version is secured stored as outlined above.

Community engagement

When participating in community engagement, your information is managed by staff employed in PRD's Community Engagement Team. With your consent your data may be shared with our client – for example the

local authority responsible for the project. Examples of when this may happen include handing over mailing lists at the conclusion of our work on a project to enable them to continue to update you.

Your data is stored securely on our systems and accessed only by authorised staff using their own username and password all created in-line with pre-defined user credentials. Personal data is also held in electronic files on the PRD network drives. These are only accessible through personal logon credentials and access privileges to specific folders.

Our website

Any information you provide to us on our website will be emailed directly to us. We do not rent, sell or share personal information about you with other people or non-affiliated companies.

6 RIGHTS TO ACCESS PERSONAL DATA

You have the right to ensure that your personal data is being processed lawfully (“Subject Access Right”). Your subject access right can be exercised in accordance with data protection laws and regulations. Any subject access request must be made in writing to martin.woodhouse@prdemail.co.uk.

We will provide your personal data to you within the statutory time frames. To enable us to trace any of your personal data that we may be holding, we may need to request further information from you.

If you have a complaint about how we have used your information, you have the right to complain to the Information Commissioner’s Office (ICO).

7 REMOVAL OF PERSONAL INFORMATION

Under Article 17 of the UK GDPR individuals have the right to have personal data erased. This is also known as the ‘right to be forgotten’. Consent to retain information for project update purposes can be withdrawn at any time, even if it was previously granted.

You can request the removal of your personal data from our systems by writing to martin.woodhouse@prdemail.co.uk. To enable us to trace any of your personal data that we may be holding, we may need to request further information from you.

Any correspondence to you, for example contact via a mailing list, will include a reminder that you can remove your data should you so wish.

8 COOKIES & THIRD PARTY LINKS

You may encounter cookies from the following services while using our website:

- Google Analytics. We use this to collect website statistics (as outlined above). For more information, please read the [Google Analytics Privacy Statement](#).
- Google Fonts. We use Google Fonts to display our website body font. For more information, please read the [Google Fonts Privacy Statement](#).

Our site may, from time to time, contain links to and from the third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept

any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

9 CHANGES TO THIS POLICY & CONTACT

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

PRD has appointed Martin Woodhouse as the Data Protection Officer (“DPO”) who will endeavour to ensure that all personal data is processed in compliance with this Policy and the Principles of the Data Protection Act 1998. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to martin.woodhouse@prdemail.co.uk.