

May 2018

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Ethical Planning LLP trading as ethical partnership ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms and conditions of business and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories of personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

ethical partnership is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: planning@ethicalpartnership.co.uk For all data matters contact Allen Creedy on 07845 709 600.



3. The purpose(s) of processing your personal data

We comply with our obligations under the “GDPR” by keeping your personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes:

- To maintain our financial accounts and records;
- To provide news and information about our services or activities
- As necessary for the performance of contracts to which the data is subject or party to or necessary to take steps prior to entering into a contract at the request of the data subject

You may give us information about you by filling in forms on our site at www.ethicalpartnership.co.uk or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, search for or subscribe to our services, participate in discussion boards or other social media functions on or linked to our site and when you report a problem with our site.

You may give us personal information relating to yourself and other persons for whom you have secured permission for us to store, process and destroy that data. These other persons may include family members, employees, suppliers, subcontractors, clients, and third parties.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data; name, address, e-mail address, phone number, financial and credit card information, photographs, land and property ownership and interests, complaints, health and safety incidents, records of offers, services and contracts.

5. What is our legal basis for processing your personal data

- Processing is carried out by a commercial organisation which is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
- Processing is necessary for compliance with a legal obligation associated with our services
- Explicit consent of the data subject has been given
- Necessary for the performance of contracts to which the data is subject or party to or necessary to take steps prior to entering into a contract at the request of the data subject

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with specific categories of recipients when necessary to do so. These include our sub – consultants and associates.

We may disclose your personal information with companies and individuals who assist us in providing services and deliverables and who perform business functions and services on our behalf. Such functions may include storing data on an European Economic Area (EEA) located server, hosting web site, financial and management services and associated with contracts.

Ethical partnership uses LinkedIn, Facebook and Twitter social media. You are free you follow us or participate with us in these sites. Please note that the providers of these Social Media platforms have their own privacy



policies and ethical partnership do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on our social media pages.

7. How long do we keep your personal data?

We retain your personal on the following basis;

Data Type	Retention period
Name, address, e-mail address, phone number,	24 months after last contact
Land and property ownership and interests	24 months after last contact
Records of offers made, services and contracts provided including reports, plans, diagrams, photographs and maps	Indefinitely
Complaints, health and safety incidents	Indefinitely
Financial data,	7 years after the calendar year to which it relates

8. Providing us with your personal data

You are under no statutory or contractual requirement or obligation to provide us with your personal data. But failure to do so may have the following consequences; we may not be able to provide contractual or other services to you.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you (a Subject Access Request or 'SAR');
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

WE DO NOT TRANSFER PERSONAL DATA OUTSIDE THE EEA.

11. Automated Decision Making

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS.





12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on the web site and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

In the event of a breach we will take appropriate steps to notify you. To exercise all relevant rights, queries or complaints please in the first instance contact Allen Creedy on 07845709600

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

Allen Creedy BA (hons) MRTPI FIEMA

Partner for and on behalf of Ethical Planning LLP

