

Privacy Notice

Headland Design Associates Ltd. (“the Company”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients, contractors, sub-contractors, suppliers, manufacturers, agents, support providers and other third parties, and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Information about us

Company name: Headland Design Associates Ltd
Business type: Private Limited Company
Registered address: 3 Stadium Court, Plantation Road, Bromborough, Wirral, CH62 3QG
VAT number: 547 0802 48
Date Protection Lead: Ruth McKew, Consultancy Director
Headland Design Associates Ltd, 65 High Street, Farndon, Chester CH3 6PT
ruth@headlanddesign.co.uk
01829 271329

What does this notice cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

Data protection principles

The Company will comply with data protection law. This means that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have explained to you clearly and not used in any way that is incompatible with these purposes;
- Relevant to the purposes we have told you about and limited to those purposes only;
- Accurate and kept up to date;
- Kept only for such time as is necessary for the purposes we have told you about; and
- Kept securely.

What is personal data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers

less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out below.

What are my rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided.

Further information about your rights can also be obtained from the Information Commissioner's Office (ICO) www.ico.org.uk or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues: www.ico.org.uk/concerns

We would appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance using the details provided.

What personal data do you collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name
- Job title
- Department
- Business name
- Address

- Email address
- Telephone number
- Mobile number
- Profession and / or industry sector
- Business cards
- Website and / or social media details
- Bank details
- Payment details
- VAT number
- Insurance details
- Curriculum Vitae (CV)
- Testimonials and / or professional references

Your personal data may also be obtained from third parties, examples of this would include: HMRC, Companies House, professional referrals and industry specialists.

How do you use my personal data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one or more of the following purposes:

- Communicating with you. This may include responding to emails or calls from you or via post.
- Supplying our services to you. Your personal details are required in order for us to enter into and fulfil a contract with you.
- Obtaining services from you. Your personal details are required in order for us to enter into and fulfil a contract with you.
- Personalising and tailoring our services for you.
- Requesting a testimonial or professional reference from or about you.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We believe there is a contractual interest, legal interest or legitimate interest in communicating with our clients, contractors, sub-contractors, suppliers, manufacturers, agents and support providers. Therefore, we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

How long will you keep my personal data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

How and where do you store or transfer my personal data?

The information you provide to us will be held on our computers and may be accessed by or given to our staff, our contractors and agents who act for us, for the purposes set out in this policy or for other purposes approved by you or as otherwise permitted by law.

By submitting your information to us, you agree that it may be transferred outside the European Economic Area. Countries outside the European Economic Area do not always have strong data protection laws. However, wherever practicable we will take steps to ensure that your information is used by third parties in accordance with this policy.

We shall never sell or rent your personal information gathered in accordance with this policy to third parties for their marketing purposes.

We also reserve the right to disclose any of the information you provide to us where required to do so by law, or to comply with a regulatory obligation, or to assist in any investigation into alleged illegal or criminal conduct.

Do you share my personal data?

We may sometimes contract with third parties to fulfil our business operations. In some cases, those third parties may require access to some or all of your personal data that we hold, for example: sharing data of clients and sub- contractors as part of project management.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

The Company takes the security of your data seriously. The Company has internal policies and controls in place to prevent your data being lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

When the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

You should be aware however that it is technically impossible to provide a totally secure system and you are responsible for ensuring your own systems are adequately protected from access by unauthorised persons.

How can I access my personal data?

If you want to know what personal data we have about you or if you would like to make any necessary changes to the personal data held about you to ensure that it is accurate and up to date, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “Subject Access Request” (SAR).

All subject access requests should be made in writing and sent to the Data Protection Lead (Ruth McKew, Consultancy Director) by email or postal addresses shown.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

Compliance to the GDPR

The following actions are undertaken to ensure that Headland Design Associates complies at all times with the accountability principle of the GDPR:

- The legal basis for processing personal data is clear and unambiguous
- All staff involved in handling personal data understand their responsibilities for following good data protection practice
- Training in data protection has been provided to all staff
- Rules regarding consent are followed
- Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquiries are handled effectively
- Regular reviews of procedures involving personal data are carried out
- Privacy by design is adopted for all new or changed systems and processes
- The following documentation of processing activities is recorded:
 - Organisation name and relevant details
 - Purposes of the personal data processing
 - Categories of individuals and personal data processed
 - Categories of personal data recipients
 - Agreements and mechanisms for transfers of personal data to non-EU countries including details of controls in place
 - Personal data retention schedules
 - Relevant technical and organisational controls in place

These actions are reviewed on a regular basis as part of the management process concerned with data protection.

How do I contact you?

To contact us about anything to do with your personal data and data protection, including to make a Subject Access Request, please use the following details:

Date Protection Lead: Ruth McKew, Consultancy Director
Headland Design Associates Ltd, 65 High Street, Farndon, Chester CH3 6PT
ruth@headlanddesign.co.uk
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Changes to this Privacy Notice

We may change this Privacy Notice from time to time, without having to give you prior notification. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website: www.headlanddesign.co.uk and / or where we think it is appropriate through email notification.

This policy will be reviewed annually.

Signed:  Ruth McKew
Position: Consultancy Director
Date: January 2019