

BACKGROUND:

Built Environment Communications Group Ltd (BECG) 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 those who participate in public consultation exercises, those who have opted-in to our marketing lists either for BECG or its clients 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.

1. Information About Us

Built Environment Communications Group Ltd.

Limited company registered in England under company number 03096503.

Registered address: The Pump House, Garnier Road, Winchester SO23 9QG.

VAT number: 730 233 380.

Data Protection Representative: Maddie Jones, Operations Manager

Email address: dataprotection@becg.com

Telephone number: 01962 893 893

Postal Address: The Pump House, Garnier Road, Winchester SO23 9QG

We are members of the Consultation Institute, the Association of Professional Political Consultants and the Public Relations Consultants Association.

2. What Does This Notice Cover?

This Privacy Notice 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.

3. What are 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 in Part 5, below.

4. 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 using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- 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 using the details in Part 11 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 11 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 the 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. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office 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.

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to the requirements of the project we have been commissioned to undertake):

- Name
- Postal address
- Mobile and landline phone numbers
- E-mail address
- Gender
- Sexual Orientation
- Date of Birth
- Age Group
- Ethnicity
- Employment details
- Shopping habits
- Income group
- Opinions
- Affiliations, memberships, voting intentions
- Socio demographic
- Social media names and profiles
- Home ownership
- Disability
- Medical history

We may also obtain your data from the client who has commissioned us to carry out the work, and from other consultants working on the project, as well as other third-party providers i.e. list-brokers.

6. 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 you have consented to our use of your personal data, because it is in our legitimate business interests to use it, because it is necessary for the performance of a task carried out in the public interest and to comply with a legal obligation on behalf of our clients. Your personal data may be used for one of the following purposes:

a) **Public Consultation**

To consult with members of the public, elected officials, government and local authority employees, business owners, shoppers and users of public and private services in respect of proposed developments enabling us to:

- Obtain feedback and opinions on the proposals
- To communicate with those who express an interest in the proposed development
- To produce reports for official bodies setting out the opinions of consultees.

b) **Public Affairs**

Contacting elected officials on behalf of our clients to provide them with information about the products and services our clients offer.

c) **Market Research**

So that we can fulfil contracts on behalf of our clients in respect of:

- Their development of new products and services
- Helping clients to understand the markets they operate in and their customers.

d) **Marketing and Public Relations**

So that we can fulfil contracts in respect of promotional activity on behalf of our clients and to carry out our own promotional activity. This includes:

- On- and off-line marketing, including supplying you with information that you have opted-in to (you may unsubscribe or opt-out at any time)
- Telemarketing
- Media relations
- Other marketing activity
- Personalising and tailoring both our and our clients' products and services for you
- Communicating with you; this may include responding to emails or calls from you
- Supplying products and services to you on behalf of our clients and our own business. Your personal details are required in order for us to enter into a contract with you.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message, and post with information, news, and offers on our and our clients' products and services. 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.

7. 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. Your personal data will therefore be kept for the periods set out in our Data Retention Policy.

8. How and Where Do You Store or Transfer My Personal Data?

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, which are set out in our Data Protection Policy, Data Security Policy and IT Security Policy.

9. Do You Share My Personal Data?

We may share your personal data with other companies in our group for analysis and research purposes (this includes subsidiaries), and with the client who commissioned us to do the work.

We may sometimes contract with the following categories of third-parties to fulfil activities on our behalf. In some cases, those third-parties may require access to some or all of your personal data that we hold. These third-parties may include:

- Mailing fulfilment companies
- Telemarketing companies
- Market research agencies

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/our client's obligations under the law, as described above in Part 8.

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

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.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of those personal data and for a copy of it (where any such personal data are held). This is known as a "Data Subject Request".

All Data Subject Requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Data Subject Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a data subject 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 data subject 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.

11. How Do I Contact You?

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

Email address: dataprotection@becg.com

Telephone number: 01962 893 893 and ask for the Data Protection Representative.

Postal Address: Data Protection Representative, BECG Ltd, The Pump House, Garnier Road, Winchester SO23 9QG.

Website: <https://becg.com/data-protection/>

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. 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 at <https://becg.com/data-protection/>.

This Notice has been approved and authorised by:

Name: Carl Daruvalla
Position: Director of Finance and Operations
Date: 30 June 2019
Due for Review by: 1 July 2020

Signature:



