

Engage Planning

Business Privacy Policy

Engage Planning Limited (Company number: 6207301) (“Engage”) is a private limited company incorporated under the Companies Act 1985. We are a communications/public consultation company specialising in liaising with local communities on behalf of private companies on planning and development projects (particularly planning applications for housing developments).

1. What is the purpose of this policy?

This privacy policy aims to give you information on how Engage collects and processes your personal data through your interactions with us for the provision of our services, and through the use of our website.

This document is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collected or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Please use the Glossary at part 14 below to understand the meaning of some of the terms used in this document.

2. Who is controlling your data?

Engage is a data controller who is responsible for your personal data (referred to as “we”, “us” or “our” in this privacy policy).

3. What data do we collect?

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Contact Data – includes billing address, delivery address, email address and telephone numbers.
- Profile Data – includes your username and password, purchase or orders made by you, your interests, preferences, feedback and survey responses.
- Marketing and Communications Data – includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Usage Data – includes information about how you use our website, products and services.
- Financial Data – includes bank account and payment card details.

- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data – includes internet protocol (IP) address, your login data, browser type and version, operating system and platform, and other technology on the devices you use to access this website.
- Aggregated Data

We also collect, use and share, Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

If we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Special categories of personal data

We do not collect any Special Categories of Personal Data about you.

4. How is your personal data collected?

You may give us details when we contract with you in relation to a proposed / upcoming planning development. It may be necessary for us to process your personal data to perform our obligations under that contract.

We may also receive your contact information through business and social networking sites, such as LinkedIn.

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy [LINK] for further detail.

5. How do we use your data?

When we use your information, for the purposes listed below, we rely upon the following legal grounds:

Purpose/activity	Type of data	Lawful basis for processing
Marketing of services to existing clients.	Contact Data	Consent
To register you as a new customer.	Contact Data	Performance of contract
To manage payments and to collect and recover money owed	Financial Data Transaction Data	Performance of contract Legitimate interest

to us.		
Marketing of services to prospective clients	Contact Data	Legitimate interest
Stored on our Business Database	Contact Data	Legitimate interest
To manage our relationship with you, which will include: (a) Notifying you about changes to our terms (b) Asking you to leave a review or take a survey.	Contact Data Profile Data Marketing and Communications	
To use data analytics to improve our website.	Contact Data Technical Data Usage Data Profile Data	Legitimate interests.
To administer and protect our business and this website (including troubleshooting data analysis, testing, system, maintenance, support, reporting and hosting of data).	Contact Data Technical Data Usage Data Profile Data	Legitimate interests
To provide you with feedback from consultees about your proposed planning applications.	Contact Data	Performance of contract Legitimate interest
When we are required to disclose information by law. (At the request of a government agency or judicial order.	Contact Data Technical Data Usage Data Profile Data	Compliance with a legal obligation.

Please note that information collected on individual business contacts is stored on a specialist business database, which is used solely for the purpose of contacting you about specific client projects, or marketing information in relation to the provision of our services, which we believe our clients have a commercial interest in.

All marketing letters and emails have an opt-out option, which asks the recipient to inform us if they do not wish to receive further information on our services. If a contact wishes not to receive any further calls or information, this will be recorded on our contact database under their record. All new telephone numbers we collect are screened against the Corporate Telephone Preference Service. All prospective clients contacted are asked whether they are happy to receive further calls.

6. How do we disclose your personal data?

We may disclose your personal data with the parties set out below for the purposes mentioned in clause 5.

We may share your personal data with the parties set out below.

- External Third Parties:
 - Service providers based in the United Kingdom who provide IT and system administration support.
 - Professional advisers, including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
 - HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

7. We do not transfer your personal data outside the European Economic Area.

8. How do you keep my data secure?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. How long will you retain my personal data for?

We will only keep your personal information as long as it is necessary for us to fulfil the purposes we collected it for, including any relating to legal, accounting or reporting requirements.

Thereafter your data will be deleted irrevocably, it will cease being processed and you will not receive any further communications from us.

10. Third party links

No personal data received from our clients will be passed to any third party.

However, our website includes links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

11. What are my rights?

- a. You have the right to:
- Request access to your personal data.
 - Request correction of your personal data.
 - Request erasure of your personal data.
 - Object to processing of your personal data.
 - Request a restriction of processing your personal data.
 - Request transfer of your personal data.
 - Right to withdraw consent.

b. Subject Access Requests

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month; if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. Who can I contact?

To update your information, for more information about this policy or to make a complaint please contact:

- Email: dataqueries@engageplanning.co.uk
- Write to us: Engage Planning Limited, University of Warwick Science Park, Warwick Innovation Centre, Warwick Technology Park, Warwick, CV34 6UW
- Call us on: 01926 623095

- Complaints:

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk) . We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance on the details above.

13. Changes to this policy

We keep our privacy policy under regular review. To ensure you are reading our most updated version of this policy, please visit our website and click on the 'Privacy' tab.

Glossary

Personal Data: any information which relates to an identified or identifiable natural person. It does not include data where the identity has been removed (anonymous data).

Special Categories of Personal Data: details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data.

Legitimate Interest: the interest of our business in conducting and managing our business to enable us to give the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Comply with a legal obligation: processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Rights

Request access: (Commonly known as 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction: This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide us.

Request erasure: This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data, where you have successfully exercised your right to object to process (see below), where we may have processed your information unlawfully or where we are required to erase for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing: Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing: This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer: We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information, which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time: This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

