

Engage Planning Limited (Company number: 6207301) 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 Planning Limited collects and processes your personal data through your use of a consultation website or our company website and when you provide comments at one of our consultation events.

This website 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 collecting 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 privacy policy.

2. Who is controlling your data?

Engage Planning Limited is the 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?

Personal data

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

- **Identity Data** includes first name, last name, title and photographs taken at planning events.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Profile Data** includes your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Usage Data** includes information about how you use our website.

- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, 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. For example, Profile Data (such as comments from arising from an event you attend, or that you submit online) may be published to allow developers and local planning authorities to view and understand the local issues surrounding the planning application, however your Identity Data and Contact Data will not be attributed to the comment. Therefore, you will not be able to be identified, or identifiable, from this data.

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?

- **Direct interactions.** You may give us your Identity and Contact by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you:
 - subscribe to our publications;
 - request marketing to be sent to you;
 - respond to a survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** 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 for further details.

5. How do we use of data?

When we use your information, for the purposes listed below, we do so on the following legal grounds:

- Your express consent
- To comply with a legal obligation
- Our legitimate interest

Purpose/activity	Type of data	Lawful basis for processing
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<p>To contact you with regard to:</p> <ul style="list-style-type: none"> • our upcoming consultation events • updates on current projects and planning progress • information about the progress of a planning proposal. 	<p>Identity data</p> <p>Contact Data</p> <p>Marketing and Communications</p>	<p>Legitimate interest (or express consent where you have expressly given your consent)</p>
<p>To collate any responses you have given into a consultation report which forms part of future planning applications.</p>	<p>Profile Data</p>	<p>Legitimate interest</p>
<p>Review the register of attendance at events to understand where the most interest in the consultation has come from.</p>	<p>Identity data</p> <p>Contact Data</p>	<p>Legitimate interest</p>
<p>To use data analytics to improve our website.</p>	<p>Technical data</p> <p>Usage data</p>	<p>Legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the information we serve to you.</p>	<p>Identity data</p> <p>Profile data</p> <p>Usage data</p> <p>Marketing and Communications</p> <p>Technical data</p>	<p>Legitimate interests (to study how individuals use our services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>Identity data</p> <p>Contact data</p> <p>Technical data</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>

6. How do we disclose your personal data?

We may share your personal data with the parties set out below for the purposes set out in the table above.

- **External Third Parties:**
 - Service providers based in United Kingdom who provide IT and system administration services.
 - 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.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. Do you transfer my data across international borders?

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.

We will store your information on our database for a maximum of seven years after our last engagement (attending a consultation event, submitting comments or requesting information on

our website). 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

This website, or a consultation website, may include 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 restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

For more information about each of these rights, please refer to the Glossary at section 14 below.

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.

14. Glossary

Personal data is defined as 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: this includes 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 means 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 means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Rights

Request access to your personal data (commonly known as a "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 of the personal data that we hold about you. 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 to us.

Request erasure of your personal data. 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 processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 of your personal data. 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 of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. 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 if we are relying on consent to process your personal data. However, 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.