

Innes Associates Privacy Notice

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INTRODUCTION

Innes Associates Architecture & Urban Design [Innes Associates or the Company] is committed to respecting your privacy. This data privacy notice sets out the basis on which Innes Associates collects and uses data, and your rights with regard to General Data Protection Regulation (GDPR) and relevant data protection law.

It is supported by our Data Protection Policy.

A handwritten signature in black ink, appearing to read 'Innes Associates', is centered on the page.

SECTION 1: COMMUNICATION

- 1.1** Innes Associates can be contacted at 6-8 Cole Street, London, SE1 4YH [telephone 020 7928 6734] or found online at www.innesassociates.net
- 1.2** Our specific contact for data and privacy issues is: Elizabeth Miller [Elizabeth.miller@innesassociates.net].

SECTION 2: DATA COLLECTION AND USE

- 2.1** We may collect your personal data when you request information about us or our services and products, when we contact you about the same, and during our process of developing and supplying these.
- 2.2** This applies, for example:
 - 2.2.1** when contact information is collected and exchanged to enable future communications
 - 2.2.2** when personal information is relevant to a design brief (for example religious requirements or health conditions)
 - 2.2.3** when details of online behaviour (traffic, IP addresses, location data or similar) are logged on our website, to improve its performance
 - 2.2.4** when information is gathered in relation to attendance at public events (CPD, planning consultations and similar)
- 2.3** We only use this information in the following cases:
 - 2.3.1** You have given your consent, for example marketing information.
 - 2.3.2** To meet contractual or legal obligations, which may include disclosing this information to third parties where we are required to do so.
 - 2.3.3** To protect your vital interests (for example health and safety or security interests, where we can prevent or reduce harm to you) and for tasks in the public interest
 - 2.3.4** For our legitimate business interests (for correspondence and tailored design work but also including marketing activities where we cannot rely on your consent)
- 2.4** We limit data access only to those employees, agents, contractors and other third parties who have a business need to know. Each is only given the information that is necessary to them, and on the basis that the information is stored securely, used confidentially and only used in accordance with specific instructions.
- 2.5** Data will be stored for an indefinite period, unless we are requested to erase it.
- 2.6** Data breaches will be reported to the Data Protection Commission (DPC) within 72 hours of discovery if there is a risk to data subjects' rights and freedoms. Data subjects themselves will be notified without undue delay if there is a high risk to their rights and freedoms.

SECTION 3: CLIENTS AND SUPPLIERS

- 3.1 We may collect your name, address, email, and business mobile. We do regard these contact details, if given freely by company, as business, not personal data.
- 3.2 If separate data is given, such as mobile number, we will store this data on password-coded machine only, and not give it out without the owner's consent. We will keep this information indefinitely in order to stay in contact with the client, but will respond to all rights if asked to do so.

SECTION 4: JOB APPLICATIONS

- 4.1 An additional level of personal information is needed when staff are employed, including job history, qualifications, current pay, relevant disabilities (with reference to reasonable adjustments either to the recruitment process or to the working environment upon employment), entitlement to work in the UK, your interests and other data.
- 4.2 This information will be supplied by you voluntarily in your application or through the interview process, or will be taken from passport and other documents that you submit.
- 4.3 We may also collect personal data from third parties, such as your referees or through background checks. This will happen only once an offer has been made to you and you will be informed that this is going to happen.
- 4.4 We have a legitimate business interest in processing personal data to inform and record the recruitment process, and to assess your suitability for employment. You are under no obligation to provide the information requested, but where information is not provided the Company may be unable to process your application.

SECTION 5: OUR WEBSITE

- 5.1 Our website and the hosting server may automatically collect technical information from visitors. This would include your Internet Protocol [IP] address, browser type and version [including plug-ins], time zone setting, operating system and platform.
- 5.2 We may also use 'cookies' in order to operate and improve our website. We will not use cookies to collect or store personally identifiable information about you and they cannot be used to identify you personally.

SECTION 6: PUBLIC EVENTS

- 6.1 On occasion, Innes Associates hosts or attends public events. Where attendee data is recorded, for example to enable follow-up communication by email, the above privacy notes will apply.

- 6.2** We also take photographs to record these events. The photographs will be used, for example, when illustrating our services, or to record the consultation process in our planning applications.
- 6.3** Attendees will be advised where photography is going to take place and will be given the option to withhold consent, where consent is required.

SECTION 7: YOUR RIGHTS

- 7.1** You can contact us at any to withdraw your consent for us to use your information (including to 'unsubscribe') or to exercise your rights under data protection law.

These rights are:

- 7.1.1** The right to be informed: Innes Associates will ask for consent and will tell data subjects how their data will be used.
- 7.1.2** The right of access: Data subjects can request information from Innes Associates about how personal data is being processed, including whether personal data is being processed and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:
 - 7.1.2.1** the purpose of the processing
 - 7.1.2.2** the categories of personal data
 - 7.1.2.3** the recipients to whom data has been disclosed or which will be disclosed
 - 7.1.2.4** the retention period
 - 7.1.2.5** the right to lodge a complaint with the Information Commissioner's Office
 - 7.1.2.6** the source of the information if not collected direct from the subject, and
 - 7.1.2.7** the existence of any automated decision making
- 7.1.3** The right to rectification: Innes Associates will rectify inaccurate personal data concerning data subjects, whenever this is brought to our attention.
- 7.1.4** The right to erasure: Innes Associates will erase data and, if requested or appropriate, give confirmation of erasure where:
 - 7.1.4.1** the data is no longer necessary in relation to the purpose for which it was collected
 - 7.1.4.2** where consent is withdrawn
 - 7.1.4.3** where there is no legal basis for the processing
 - 7.1.4.4** there is a legal obligation to delete data
- 7.1.5** The right to restrict processing: On request, Innes Associates will stop using data within 30 days although this data may continue to be stored. This would apply in the following circumstances:
 - 7.1.5.1** if the accuracy of the personal data is being contested
 - 7.1.5.2** if our processing is contested but the data subject does not want it erased

7.1.5.3 if the data is no longer needed for the purpose of the processing

7.1.5.4 if the data subject has asked for data to be erased, but Innes Associates has a legal obligation to retain it.

SECTION 8: MONITORING AND REVIEWING

8.1 Innes Associates Architecture & Urban Design's office manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

8.2 Innes Associates Architecture & Urban Design will review and update this policy at bi-annual intervals. Feedback on this policy and how it may be approved is encouraged. Feedback of this nature should be addressed to the office manager.