

## **ECS Privacy Notice Policy relating to Personal Data**

ECS Consultants Ltd (ECS) is committed to protecting privacy including personal data for Client, Public and Stakeholder. This Privacy Notice Policy (“Policy”) will inform you as to how we look after personal data for the public and inform on privacy rights. The policy should be read in conjunction with the current edition of ECS GDPR Policy.

### **1. Purpose of this Privacy Notice Policy**

This policy aims to provide information on how ECS collects and processes personal data through the use of email. Personal data is only requested and collated to provide statistical information to enable our technical design solutions. Data is limited to that contained within the electoral role (name and address) and does not include any private, transactional or financial data.

It is important that you read this policy together with any bespoke documentation we may provide on specific occasion when we are requesting and processing personal data from Clients, the Public or Stakeholders.

### **2. Controller**

ECS Consultants Limited is the controller and responsible for your personal data.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

### **3. 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](http://www.ico.org.uk)). We would, however, appreciate the opportunity to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **4. Changes to this Privacy Notice and your duty to inform us of changes**

We keep this policy under annual review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **5. Third-party links**

ECS Consultants 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.

### **6. Personal Data we receive**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

1. Identity data (including your first name, last name, marital status, title, gender).
2. Contact data (including your billing address, email address, telephone contact numbers and social media contact information).

For the avoidance of doubt, ECS will NOT request: -

1. Technical Data (including internet protocol (IP) address, your login data, browser type or other technology)
2. Profile data (including history, preferences)
3. Usage Data (including information about website, products and services).
4. Marketing and Communications Data (including marketing or third parties)
5. Financial Data (including bank account and payment cards).
6. Transaction Data (including details about any payments/services)
7. Finally, we do not collect any Special Categories of Personal Data about you (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). Nor do we collect any information about criminal convictions and offences.

## **7. 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, we may aggregate your Usage Data to calculate the percentage of users utilising a services commodity (e.g. heating or electricity). However, 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.

## **8. If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a Services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **9. How is personal data collected?**

We may use different methods to collect data from and about you including: -

- **Direct interactions.** You may give us your Identity and Contact by filling in forms or by corresponding with us by email.

- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - analytics providers, such as Google based outside the EU;
    - search information providers, such as Google based outside the EU;
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU

## 10. How your personal data will be used?

We will only use your data in circumstances where the data protection legislation allows us to. Most commonly, we will use your personal data in the following circumstances:

- Information relating to engineering projects – usually for statistical analysis.

We have set out below, in a table format and within the numbered paragraphs thereafter, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that 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 personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing.</b>
To provide you with information regarding a specific project.	(a) Identity data (b) Contact data (c) Communications Data	(a) Necessary for our legitimate interests
To manage our relationship with you which will include.	(a) Identity (b) Contact (c) Profile (d) Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(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 or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, events, customer relationships and experiences	(a) Technical	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

If, in the future, we would like to process your personal data for a purpose other than that which it was collected for, we will provide you with information about that and request your consent before doing so.

## **11. Marketing**

We will provide you with choices regarding certain personal data uses. This will relate to general public data.

## **12. Opting out**

You can ask us to stop sending you messages by logging into the website.

Where you opt out, this will not apply to personal data provided to us other than in accordance with this privacy notice.

## **13. Cookies**

You can set your browser to control browser cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

## **14. What ECS will NOT do with your personal data**

ECS Consultants Ltd will not provide your personal data, received in accordance with the terms of this privacy notice, to third parties (other than those specified within this privacy notice) without your explicit and informed prior consent.

## **15. International Transfers (Outside EEA)**

At this time, none of our external third parties are based outside the EEA. In the event that we engage an external third party which is based outside the EEA, their processing of your personal data would involve a transfer of data outside the EEA and will be dealt with in accordance with the section below.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries or organisations which have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **16. Data Security**

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. These measures are identified within the IT Section of our GDPR Policy. In addition, we limit access to your personal data to those employees who have a business need to know. They will only process your personal data on peer instruction 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.

## 17. Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the technical purposes we collected it for, including for the purposes of satisfying any legal, regulatory requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal and regulatory requirements.

In some circumstances you can ask us to delete your data: see [your legal rights](#) below for further information.

## 18. Your Rights

Under the data protection legislation you have a number of rights with regard to your personal data. You have the right to:

**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. 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).

**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** where 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## **19. Identity and contact details of controller and data compliance advisor**

ECS Consultants Limited is the controller of data for the purposes of the data protection legislation.

If you have any concerns as to how your data is processed, or if you have any questions about this Privacy Notice Policy, you can contact our data compliance managers at [ECAdmin@ecs-ecs.co.uk](mailto:ECAdmin@ecs-ecs.co.uk), or you can write to us at:

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