### HANKINSON DUCKETT ASSOCIATES LIMITED - PRIVACY POLICY

#### Who we are

This is the privacy policy of Hankinson Duckett Associates Limited, a company registered in England and Wales (company number 03462810) whose registered office is at The Stables, Howbery Park, Benson Lane, Wallingford, OX10 8BA.

### When do we collect personal information and what personal information do we collect?

We may collect personal information about you as follows:

- If you fill in forms on our website, we will collect your contact details and the other information you provide in the form.
- If you contact us by any other means (e.g. email or telephone), we may keep a record of that contact and the information you provide us at that time.
- If you instruct us to provide services to you, we will collect a range of information which is required to provide those services. This may include contact details and your job title/position; financial data, such as bank account details; and transaction data, including details about the services we have provided and payments received from you.
- We may collect personal data relating to third parties in the course of providing services to our customers, including contact details of the various parties involved in an instruction and any relevant suppliers to ourselves.
- We may also collect personal data in the form of business contact details for our customers, contacts and persons working within our industry, for the purposes of occasionally sending you information and communications which we believe will be of interest to you.
- If you apply for employment or work with us, we will collect a range of information relating to you which is outlined in more detail in our employee and candidate documentation available on request.

### **Cookies**

We may receive and store certain types of information whenever you interact with our website. For example, like many websites, we may use "cookies", and we may obtain certain types of information when your web browser accesses our website. Third parties might also do this on our website.

Cookies are pieces of information that we may transfer to your computer's hard drive through your web browser when you are viewing our website. These pieces of information allow our website to act on information that will make your use of the website more rewarding. None of these cookies contain any password, phone number or address details in text format.

Examples of information we may collect and analyse could include the Internet Protocol (IP) address used to connect your computer to the internet; computer and connection information such as browser type and version, operating system and platform; the full Uniform Resource Locators (URL), click stream to, through and from our website, including date and time; cookie number; pages viewed; and your site history.

The "help" portion of a toolbar on most browsers will tell you how to protect your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. However if you turn cookies off you may not have access to some of the features that make the website more efficient and services may not function properly.

For more information about the cookies we use on our website, please contact us using the details below.

#### Links to other websites

Our website may, from time to time, contain links to other websites which may be of interest to you. If you follow a link, please note that the other website will have its own privacy policy and you should check this before you submit any personal information to that website. We are not responsible for the content of other websites or their use of your personal information.

### How do we use your personal information?

- If you visit our website, we will use information about your visit to help us make our website experience as user-friendly for as many visitors as possible on the basis that we have a legitimate interest to do so.
- If you fill in forms on our website, or contact us by any other means, we use the information you
  provide to respond to your enquiry or contact you on the basis that we have a legitimate interest
  to do so.
- If you instruct us to provide services, we will use the information you provide to carry out our contractual obligations to you and to fulfil any legal obligations arising from your instructions. We may also use it to notify you about changes in our organisation on the basis that this is compatible with our original use of your information.
- We will use any third party personal data collected in the course of providing services to carry out our contractual obligations to our customers and to fulfil any legal obligations arising from such instructions.
- We may contact you on occasion with information if you are a customer or contact of the company or a person who we reasonably believe would be interested in receiving that particular communication. Any such communications are tailored and considered and are sent on the basis that we have a legitimate interest in doing so. We do, by way of example, commonly send an annual newsletter, alerts regarding seasonally constrained survey periods and a free calendar to our clients and contacts once a year by post.

We will not use your personal information for any purpose not explained in this privacy policy or the documents that apply to our staff members and applicants for employment.

We expect and require that our customers comply with the provisions of the General Data Protection Regulation and any other legislation governing the processing of personal data and have an appropriate lawful reason for the processing of any personal information that is supplied to us in the course of us providing services to them (including any third party personal data supplied).

# Where do we store your personal information and how it is kept secure?

Some of the information you provide to us will be transmitted electronically, e.g. information provided via our website or by email. We would remind you that information transmitted via the internet is not completely secure and although we will do our best to protect any information transmitted in this way, we cannot guarantee its complete security.

We have put in place appropriate security measures to prevent your personal data being accidently lost, accessed or used in an unauthorised way, altered or disclosed. All information you provide to us is stored on our secure servers currently located in the United Kingdom. No information you provide to us is transferred to, or stored at, a destination outside the European Economic Area.

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.

# Who do we share your personal information with?

We may disclose your personal information to third parties if we are under a duty to disclose or share it in order to comply with any legal obligation (for example our auditors, our insurers, professional advisers and HMRC) or with your consent.

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

## How long do we keep your personal information?

We will keep your personal information for the following periods of time, subject to our email data retention policy:

Circumstances in which personal information was provided	How long do we keep it?
Information submitted via website form (that does not lead to an instruction)	12 months
Contact by any other means (e.g. email or telephone) which does not lead to an instruction	12 months
In the course of providing services	Usually 7 years from the conclusion of the instruction unless we inform you otherwise

We may, for the avoidance of doubt, retain documents and information that we have prepared either in the course of bidding or tendering for services, or in the course of providing services to you, indefinitely if we remove or redact from such documents your personal information.

### Your rights in relation to the personal information we hold

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 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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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.

### Contacting us

If you would like to communicate with us about any of the rights mentioned above, or if you have any other queries about the matters mentioned in this privacy policy, please contact us using one of the following options:

Website: <a href="www.hda-enviro.co.uk">www.hda-enviro.co.uk</a>
 Email: <a href="consult@hda-enviro.co.uk">consult@hda-enviro.co.uk</a>

Post: The Stables, Howbery Park, Benson Lane, Wallingford, Oxfordshire, OX10 8BA

Phone: 01491 838 175

## **Complaints**

You have the right to complain to the Information Commissioner about the way in which we collect and use your personal data: <a href="https://www.ico.org.uk/concerns">www.ico.org.uk/concerns</a> or telephone 0303 123 1113.

### Changes to this privacy policy

This policy is effective from 25 May 2018. We may change this privacy policy from time to time by updating this webpage.