

S P Broadway Limited Privacy and Cookies Policy: Public Consultations

S P Broadway Limited understands that your privacy is important to you and that you care about the use of your personal data. We respect and value the privacy of participants in consultations we run; this privacy statement explains what personal data or information we collect from you when you participate in a consultation or visit our website, and how we use it. We would encourage you to read the information below. Our full privacy policy is available on our main website (click [here](#) to view).

Who are we?

S P Broadway is a Limited Company registered in England under company number 08658102. Our registered address is: Radcot Lodge, Radcot, Bampton, Oxfordshire, OX18 2SX. S P Broadway Limited is a registered Data Controller (ICO registration number ZB144472).

What is Personal Data?

“Personal data” is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’. Personal data means, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

What personal data or information do we collect?

We may collect personal data about individuals participating in consultations we run, for example local residents and local elected representatives. The personal information we collect may include your name, address, email address, IP address, and information regarding what pages you access on our websites and when.

How do we collect data or information from you?

We collect personal information about you when you:

- Provide your feedback to a consultation on one of our websites or in person
- Make an enquiry via our website or via the telephone
- Communicate with us via email

How is your information used?

We collect your personal data or information to operate our business effectively and to provide a high-quality service. We may use your information:

- To engage with you and gather your feedback relating to planning proposals
- To maintain security of our IT infrastructure

We believe that these purposes are justified on the basis of our legitimate interests in running the consultation about proposed developments for our clients.

This shorter version of our privacy policy applies to:

- Individuals providing Feedback during Public Consultations on Development Proposals

Individuals providing Feedback during Public Consultations on Development Proposals

We give individuals the opportunity to provide their opinions about proposed developments in their local area during the public consultation phase – either online via a feedback form on a consultation website, or on paper via a feedback form provided to the individual at an event organised by S P Broadway Ltd (such as a public exhibition of the proposed development).

We may collect the following information as part of the feedback form:

- Name, address and contact information
- Opinions and feedback about the proposed development

Your opinions and feedback about the proposed development are collated and summarised in a report provided to the client, so that our clients can understand better the potential impacts of proposed developments, both positive and negative, on local communities. Feedback included in the report is always anonymised. If a planning application is ultimately submitted to the local planning authority for the proposed development, the application will likely include a document prepared by S P Broadway Ltd – a ‘Statement of Community Involvement’ – that incorporates a summary of the feedback received during the public consultation period. Again, this feedback is always anonymised.

If we request your name, address and contact information as part of the feedback form, you have the choice whether or not to provide these to us (either in person or online). If you do provide them, we will only use them to contact you to answer queries you raise via the form, or to contact you to explore your responses in more detail. In addition, it is helpful for us to understand where you live in relation to the proposed development, as it gives additional context to the feedback you’ve provided. We don’t routinely share your personal data with third parties; we will only share your details with the client in circumstances where it is necessary; for example, either you or they wish to explore the points you made in more depth directly. We will never use your information for marketing purposes.

You may receive a letter or leaflet about proposed developments to your residence or business in the post. We engage a mailing house to send information to all residential and commercial addresses within a radius of the planned developments. We send this on the basis of the proximity of the address to the proposed development, with the intention of making you aware of the plans and your opportunity to engage in the public consultation process. We have no details about your name or other ways to contact you, prior to you engaging with us directly and giving us this information.

We use the MS Office suite of products to manage our business, and your information will be stored within them. We also use Dropbox for document storage and sharing within the organisation; their servers are based in the USA and as such personal data may be transferred outside of the UK and European Economic Area (EEA). Further details about international transfers are available later in the policy.

We store your information for the duration of the consultation period and our ongoing project with our client. Once the project is complete, we review the personal data held and delete your information when it is no longer required, up to one year after project the project ends.

Who has access to your information?

We limit access to your personal data to our employees who have a legitimate need to know and to third-party service providers (see below), who provide a service to us within the scope of our business operations. We ensure that they are aware of their duty of confidentiality.

We do not sell or rent your personal data or information to any third party or share your information with third parties for their marketing purposes.

We may on occasion pass your details to our client, where a direct discussion between the two parties will be beneficial to our client's understanding of the feedback provided by you regarding a development proposal. We will always be involved in arranging that discussion.

We may pass your information on to third party service providers for the purposes of completing a task or providing services to you on our behalf. The majority of these service providers are software providers whose systems we use to enable us to store information and communicate with you. However, we disclose only the personal information necessary to deliver that service and have a contract in place that requires them to keep your information secure and not to use it for other purposes. The purposes for which they can access your data are limited in scope and they cannot use your data for their own purposes.

We currently use these relevant third-party service providers in the following areas of our business:

Service Provider	Activity Carried Out	Sector	Location
Managed IT Service Provider <i>(data processor)</i>	IT Support and Communications	Information Technology	UK
Mailing House <i>(data processor)</i>	Leaflet drop to all residents and businesses (address only) in local area	Communication	UK
Document Storage and Sharing Software <i>(data processor)</i>	Document management	Information Technology	USA/EEA
Website Design & Hosting	Website hosting, design and support	Information Technology	UK & EEA

If any of your personal data are shared with a third party, as described above, we will take steps to ensure that your personal data are handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above.

Transfers outside of the UK and European Economic Area

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data are treated just as safely and securely as they would be within the UK and under our Data Protection Legislation as follows:

- We share your data with external third parties, as detailed throughout and in the table above, that are based outside of the UK & EEA. The following safeguards are applied to such transfers:
 - We will only transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission. More information is available from the [European Commission](#).
 - We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the [European Commission](#).
 - Where we transfer your data to a third party based in the US additional steps have been taken to ensure your personal data will be treated as securely and safely as it would be in the UK and under the GDPR. We have signed Data Processing Agreements with our data processors based on model contract clauses provided by the European Commission (also known as ‘standard contract clauses’), which impose suitable data protection standards on a contractual basis.

Please contact us using the contact details provided below for further information about the particular data protection mechanisms used when transferring your personal data to a third country.

What are my rights?

Under Data Protection Legislation, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the contact details provided at the end of this policy.
- The right to access the personal data we hold about you. The section “How Can I Access My Personal Data?” will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us are inaccurate or incomplete. Please contact us using the contact details provided at the end of this policy.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold, in certain circumstances. Please contact us using the contact details provided at the end of this policy to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.

- The right to object to us using your personal data for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data are processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact using the contact details provided at the end of this policy.

It is important that your personal data are kept accurate and up-to-date. If any of the personal data we hold about you change, please keep us informed for as long as we have those data. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first using the contact details provided at the end of this policy.

How can I update my information?

The accuracy of your information is important to us. If you change your contact details or if you want to update any of the information we hold on you, you can email us at: office@spbroadway.com or by post at: Radcot Lodge, Radcot, Bampton, Oxfordshire, OX18 2SX

How can I access my Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests can be made in writing, either via email or via the postal addresses shown below, or verbally, either in person or on the phone.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data, within that time. In some cases, however, particularly if your request is more complex, more time may be required, up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

You also have the right to lodge a complaint about our processing of your personal data with the UK's [Information Commissioner's Office](#).

Keeping your data secure

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Limiting access to your personal data to those employees and third-party processors with a legitimate need to know and ensuring that they are subject to duties of confidentiality.
- Procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.
- Adhering to our policies and processes including, physical security, back-up, encryption, access control and password protocols.

Contacting us via email

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government standards. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit. We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

Cookie Information for Visitors to our Websites

What are Cookies?

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

How do we use Cookies?

Cookies provide information about individuals' usage of the website, which may identify you as the same individual even if we do not know your name, we can identify location, IP address and device information. As such, we make sure you have a choice about the cookies that are placed on your device for our statistical purposes by Google Analytics, which help us to understand more about the ways in which people use our website. We would appreciate it if you opt-in to accept these cookies when the website asks you, as it will help us to improve it over time.

We use cookies on our main website (www.spbroadway.com) and some of our consultation websites. When non-essential cookies such as Google Analytics are in use on one of our websites, you will always be asked whether or not you consent for the cookies to be placed on your device via the cookie consent tool. If you don't see a cookie consent banner on your first visit to the site, no non-essential cookies are being placed as you use it.

What Cookies do we use?

We use first-party cookies (Cookies set by S P Broadway) and third-party cookies (cookies set by other providers, e.g. analytics providers such as Google). Details of the cookies in use are available below:

Cookie	Name	Purpose	More information
Necessary Cookies: Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies. No consent is required for Necessary cookies.			
PHPSESSID	Session ID	A session ID allocated by the webserver, which preserves user session state across page requests.	
Non-essential cookies: Non-essential cookies have a range of functions, from allowing the website owner to understand how users are moving around and using their website (Statistical) to third-party cookies which look to build a profile of individuals that can inform their online marketing decisions (Marketing). Non-essential cookies require a user to 'opt-in' to accept the cookie onto their device.			
_ga _gid	Google Analytics (Statistical)	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information, including IP address, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	Click here for an overview of privacy at Google.
_gat_gtag_UA*	Google Analytics (Marketing / Tracking)	These cookies are used to enable us to store and track conversions for specific goals we've set.	Click here for an overview of privacy at Google.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our websites, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website. In addition, if you linked to one of our websites from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third party site.

How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of:

Data Protection Lead: David McFarlane

Email address: david@spbroadway.com

Postal address: S P Broadway Ltd, Radcot Lodge, Radcot, Bampton, Oxfordshire, OX18 2SX

Changes to this privacy notice

We keep our privacy notice under regular review. This notice was last updated on **12 August 2021**.