



ADAMS HENDRY CONSULTING LIMITED PRIVACY NOTICE FOR STAKEHOLDERS AND PROSPECTIVE STAKEHOLDERS

Data Controller:

Adams Hendry Consulting Ltd (AHCL)

Data Controller's Representative:

The relevant AHCL Director in charge of the commission or prospective commission.

Data Processor:

Director in charge of the commission and any AHCL employee working on the commission.

Introduction

1. AHCL collects and processes personal information, or personal data, relating to stakeholders and prospective stakeholders, their employees and internal advisors in order to undertake commissions for its clients and to manage the working relationship. This personal information may be held by AHCL on paper or in electronic format. Stakeholders include any external statutory or non-statutory advisor or body that needs to be contacted in undertaking the day-to-day planning and related business of AHCL.

2. AHCL is committed to being transparent about how it handles such personal information, to protecting the privacy and security of such information and to meeting its obligations under the General Data Protection Regulations ("GDPR") and the Data Protection Act 2018. The purpose of this privacy notice is to make stakeholders aware of how and why AHCL will collect and use personal data both during and after any relationship with AHCL. We are required under the GDPR to inform you of the information contained in this privacy notice.

3. This privacy notice applies to all current, prospective and former stakeholders, their employees and internal advisors ('stakeholders').

Data protection principles

4. Under the GDPR, there are six data protection principles that AHCL must and will comply with. These provide that the personal information which we hold in respect of stakeholders must be:

- a) Processed lawfully, fairly and in a transparent manner.
- b) Collected only for legitimate purposes that have been clearly explained and not further processed in a way that is incompatible with those purposes.
- c) Adequate, relevant and limited to what is necessary in relation to those purposes.
- d) Accurate and, where necessary, kept up to date.
- e) Kept in a form which permits identification for no longer than is necessary for those purposes.
- f) Processed in a way that ensures appropriate security of the data.

What types of personal information do we collect about our stakeholders?

5. Personal information is any information about an individual from which that person can be directly or indirectly identified. AHCL collects, uses and processes a range of personal information about stakeholders. This includes (as applicable):

- a) Name;
- b) Business Address;

- c) Personal Address;
- d) Business phone number;
- e) Personal phone number;
- f) Business e-mail address;
- g) Personal e-mail address;
- h) Details of skills, qualifications and work history, and
- i) Professional memberships.

6. AHCL do not consider that they hold or process any 'special categories' of personal information about stakeholders.

How is personal information collected?

7. AHCL collects the range of personal information about stakeholders listed in paragraph 5 in the course of working on relevant commissions, or potential commissions.

Why and how do we use the personal information we collect?

8. AHCL will only use the personal information it collects from stakeholders when the law allows it to. These are known as the lawful basis for processing. AHCL will use stakeholders' personal information in one or more of the following circumstances:

- a) where AHCL needs to do so to perform any contract or agreement it has entered into with the stakeholder, or in order to take appropriate steps to enter into a contract with its stakeholders.
- b) where AHCL need to comply with a legal obligation.
- c) where it is necessary for AHCL's legitimate interests (or those of a third party), and the interests or fundamental rights and freedoms of the individual concerned do not override those interests.

9. AHCL requires all of the types of personal information listed under paragraph 5. AHCL is a planning and environmental consultancy. AHCL works on the full range of planning and consenting tasks, from project inception through to project implementation. AHCL also acts for clients in respect of protecting their interests from other

third-party proposals and actions. It is necessary for AHCL to hold personal data of stakeholders in order to undertake this work correctly and to a high quality, and to promote its services and abilities. In summary, this constitutes the legitimate interests of the business. AHCL believe that stakeholders have a reasonable expectation that it will process this type of personal information.

Change of purpose

10. AHCL will only use personal information for the purposes for which it has been collected. If AHCL needs to use personal information for a purpose other than that which it was collected, it will update this privacy notice and provide it as necessary.

Who has access to personal information?

11. Stakeholders' personal information may be shared internally within AHCL. Stakeholders' personal information may also be shared with other parties including: our clients, external companies and technical advisors; external statutory advisors and bodies, external non-statutory bodies and organisations, and members of the public.

12. Personal data will be shared internally within AHCL and other parties for the purposes of or in connection with undertaking commissions or potential commissions on behalf of clients, or for legitimate reasons of developing the business of AHCL.

How does AHCL protect stakeholders' personal information?

13. AHCL has put in place measures to protect the security of stakeholders' personal information. It has internal policies, procedures and controls in place to try and prevent personal information from being accidentally lost or destroyed, altered, disclosed, used or accessed in an unauthorised way. In addition, we limit access to stakeholders' personal information to those AHCL employees who have a business need to know in order to perform their job duties and responsibilities. Further information about these measures can be obtained, in the first instance, from AHCL's Office Manager.

14. Where stakeholders' personal information is shared with external bodies, we take appropriate steps to ensure that they hold and process the information in accordance with data protection law.

15. AHCL has in place appropriate procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and the appropriate stakeholders of a suspected breach where we are legally required to do so.

How long will AHCL keep stakeholders' personal information?

16. AHCL will only retain stakeholders' personal information for as long as is necessary to fulfil the purposes for which it was collected and processes, including for the purposes of satisfying any legal, professional indemnity, health and safety, reporting, tax or accounting requirements.

17. Having regard to town planning and related law, and other legislation with which AHCL has to comply, stakeholders' personal information will generally be held for a minimum of ten years from the end of any relationship between AHCL and the stakeholder.

18. Personal information which is no longer to be retained will be securely and effectively destroyed or removed from our IT systems.

Stakeholders' rights in respect of personal information.

19. It is important that the personal information we hold about stakeholders is accurate and up to date. Stakeholders are asked to please keep us informed if personal information changes, AHCL cannot be held responsible for any errors in personal information in this regard unless they have been notified of any relevant change.

20. Stakeholders have a number of statutory rights in respect of personal information. Subject to certain conditions, and in certain circumstances, Stakeholders have the right to:

- request access to personal information - this is usually known as making a data subject access request and it enables stakeholders to receive a copy of the personal information AHCL holds about them and to check that it is being lawfully processed;
- request rectification of personal information - this enables stakeholders to have any inaccurate or incomplete personal information AHCL hold corrected;
- request the erasure of personal information - this enables stakeholders to ask AHCL to delete or remove personal information where there's no compelling reason for its continued processing, e.g., it is no longer necessary in relation to the purpose for which it was originally collected;
- restrict the processing of personal information - this enables stakeholders to ask AHCL to suspend the processing of personal information, e.g., if stakeholders contest its accuracy and so want AHCL to verify its accuracy;
- object to the processing of personal information - this enables stakeholders to ask AHCL to stop processing personal information where AHCL are relying on the legitimate interests of the business as its legal basis for processing and there is something relating to the particular situation which makes the stakeholders decide to object to processing on this ground, and
- data portability - this gives stakeholders the right to request the transfer of personal information to another party so that stakeholders can re-use it across different services for their own purposes.

21. If there are any stakeholders who wish to exercise any of these rights, please contact our Office Manager. AHCL may need to request specific information from you in order to verify your identity and check the stakeholders right to access the personal information or to exercise any of the stakeholders other rights. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

22. If you believe that AHCL has not complied with data protection rights, stakeholders have the right to

make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

Transferring personal information outside the European Economic Area

23. AHCL will not transfer stakeholders' personal information to countries outside the European Economic Area.

Automated decision making

24. Automated decision making occurs when an electronic system uses personal information to make a decision without human intervention. AHCL will not use automated decision making.

Changes to this privacy notice

25. AHCL reserves the right to update or amend this privacy notice at any time, including where AHCL intends to further process stakeholders' personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. AHCL will issue a new privacy notice when it makes significant updates or amendments. AHCL may also notify stakeholders about the processing of personal information in other ways.

Contact

26. If stakeholders have any questions about this privacy notice or how AHCL handle personal information, please contact AHCL's Office Manager, whose contact details are provided below:

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