
LAND AND PROPERTY PLANNING SOLUTIONS LIMITED

PRIVACY POLICY

1 JANUARY 2019

BACKGROUND:

LP Planning understands that your privacy is important to you and that you care about how your personal data and project related data is used and shared online. We respect and value the privacy of everyone who visits this website, www.lpplanning.co.uk ("our website") and will only collect and use personal data and project related data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our website. If you do not accept and agree with this Privacy Policy, you must stop using our services immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"project related data"	means any and all data that relates to a specific project where our services have been engaged to advise and act on behalf of the client. This includes plans, correspondence, project briefs, photographs, telephone conversation records, invoices, planning history searches and enforcement notices.
"personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via our website. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
"We/Us/Our"	means Land and Property Planning Solutions Limited, a limited company registered in England under company number 05935263, whose registered address and main trading address is Unit 5a First Floor, Industry Park, Cricketts Lane, Chippenham, Wiltshire, England, SN15 3EQ.
"Cookie"	means a small text file placed on your computer or device by a website when you visit certain parts and/or when you use certain features of websites.
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
"current and or historic client"	an individual or company who has engaged our services and given formal instructions to act on their behalf.

“enquiry”

is a project that does not proceed into an instruction.

2. Information About Us

- 2.1 Our website is owned and operated by Land and Property Solutions Limited, a limited company registered in England under company number 05935263, whose registered address is and whose main trading address is Unit 5a First Floor, Industry Park, Cricketts Lane, Chippenham, Wiltshire, England, SN15 3EQ.
- 2.2 Our VAT number is 255691674.
- 2.3 Our Data Protection Officer is the Office Manager, and can be contacted by email at enquiries@lpplanning.co.uk, by telephone on 01249 461869, or by post at Unit 5a First Floor, Industry Park, Cricketts Lane, Chippenham, Wiltshire, England, SN15 3EQ.
- 2.4 We are regulated by and are a member of the Royal Town Planning Institute (RTPI).
- 2.5 Our operations are covered by professional indemnity insurance.

3. What Does This Policy Cover?

This Privacy Policy applies to your use of our website and our services if you engage with us contractually. Our website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data and project related data have been designed to uphold:
 - 4.1.1 The right to be informed about our collection and use of personal data and project related data;
 - 4.1.2 The right of access to the personal data and project related data we hold about you (see section 12);
 - 4.1.3 The right to rectification if any personal data and project related data we hold about you is inaccurate or incomplete (please contact us using the details in section 13);
 - 4.1.4 The right to be forgotten – i.e. the right to ask us to delete any personal data and project related data we hold about you, however there are exceptions as explained in section 7.5;
 - 4.1.5 The right to restrict the processing of your personal data and project related data;
 - 4.1.6 The right to data portability (obtaining a copy of your personal data and project related data to re-use with another service or organisation);
 - 4.1.7 The right to object to us using your personal data and project related data for particular purposes; and
 - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about our use of your personal data and project related data, please contact us using the details provided in section 13 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK’s supervisory authority, the Information Commissioner’s Office.
- 4.3 For further information about your rights, please contact the Information Commissioner’s Office or your local Citizens Advice Bureau.

5. What Data Do We Collect And Store?

We do not collect personal data and project related data on our website except where you have provided data to us through our Project Enquiry Webform. Our webform collects only the following data:

- 5.1 **Full name;**
- 5.2 **Telephone number;**
- 5.3 **Email address;**
- 5.4 **Site and contact address;**
- 5.5 **Your description of proposal; your connection to the site; timescales, any additional information;**
- 5.6 **Local Planning Authority if applicable**
- 5.7 **How you heard about us**
- 5.8 **In addition to the above, once we take instructions from you we gather, and store specific information related to your project which forms part of our brief and contract between our company and you.**

6. Cookies

- 6.1 All Cookies used by and on our Site are used in accordance with current Cookie Law. Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 6.2 You will be given the opportunity to allow only third-party Cookies.
- 6.3 Certain features of our site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will be sought to place these Cookies. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that our site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 6.4 Our site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our site is used. This, in turn, enables us to improve our site and the products and services offered through it.
- 6.5 The analytics service(s) used by our site use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our Site, it does enable us to continually improve our Site, making it a better and more useful experience for you.
- 6.6 The analytics service(s) used by our Site use(s) the following Cookies:

Name of Cookie	1 st /3 rd Party	Provider	Purpose
_ga	3 rd	Google	Used to distinguish users
_gid	3 rd	Google	Used to distinguish users

_gat	3 rd	Google	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named _dc_gtm_<property-id>
AMP_TOKEN	3 rd	Google	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a client IS from AMP Client ID service
gac<property-id>	3 rd	Google	Contains campaign related information for the user. If you have linked your Google Analytics and AdWords accounts, AdWords website conversation tags will read this cookie unless you opt-out.

- 6.7 In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 6.8 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 6.9 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.
- 6.10 Our website does not currently collect cookies and we have no access to third party cookies.

7. How Do We Use Your Data?

- 7.1 All personal data and project related data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 8, below.
- 7.2 Our use of your personal data and project related data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data and project related data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:
- 7.2.1 Replying to emails/correspondence/web enquiry forms/telephone from you; and
- 7.2.2 Supplying our services to you (please note that we require your personal data and project related data in order to enter into a contract with you).
- 7.3 We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 7.4 You have the right to withdraw your consent to us using your personal data and project related data at any time, and to request that we delete it.
- 7.5 We do not keep your personal data and project related data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
- 7.5.1 For the data described previously in section 5, data will be retained in the following ways:
- 7.5.1.1 For enquiries that do not result in contracted work, 6 years.

7.5.1.2 For current and historic clients, indefinitely to defend any future legal claims.

8. **How and Where Do We Store Your Data?**

- 8.1 We only keep your personal data and project related data for as long as we need to in order to use it as described above in section 7, and/or for as long as we have your permission to keep it.
- 8.2 Your data will only be stored in the UK.
- 8.3 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through our website.
- 8.4 Steps we take to secure and protect your data include:
 - a) Electronic copies of personal data and project related data are stored securely using passwords.
 - b) Electronic copies of personal and project related data are stored securely on remote devices using passwords and data encryption.
 - c) All hardcopies of personal data and project related data, along with any electronic copies stored on physical, removable media are stored securely in a locked box, drawer, cabinet, or similar;
 - d) All personal data and project related data stored electronically is backed up at regular intervals.

9. **Do We Share Your Data?**

- 9.1 Subject to section 8.2, we will not share any of your data with any third parties for any purposes except to enable us to undertake any contracted work. In this circumstance, third parties include:
 - 9.1.1 Sub-contractors;
 - 9.1.2 Professional consultants and organisations (limited to those necessary to contribute to the contract such as solicitors or architects);
 - 9.1.3 Local Authorities.
- 9.2 In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data and project related data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.

10. **What Happens If Our Business Changes Hands?**

- 10.1 We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data and project related data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.
- 10.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will not, however, be given the choice to have your data deleted or withheld from the new owner or controller due to the legal obligations under our insurance cover for us to retain planning case information.

11. **Your Right to Withhold Information**

You may access our website without providing any data at all. However, to use all features and functions available on our website you may be required to submit or allow for the collection of certain

data (as under section 5).

12. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data and project related data held by us (where such data is held). Under the GDPR, no fee is payable, and we will provide any and all information in response to your request free of charge. Please contact us for more details at enquiries@lpplanning.co.uk.

13. Contacting Us

If you have any questions about our website or this Privacy Policy, please contact us by email at enquiries@lpplanning.co.uk, by telephone on 01249 461869, or by post at Unit 5A, First Floor, Industrial Park, Cricketts Lane, Chippenham, Wiltshire, England, SN15 3EQ. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 5 and 11, above).

14. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.