

## WHITE CONSULTANTS DATA PROTECTION AND PRIVACY POLICY

This policy is valid from May 25th 2018.

### Introduction

We respect and value the privacy of everyone who we work with or who enquires about us. We will only collect and use contact information in ways that are necessary to carry out our work and which is useful to our clients and contacts in a manner consistent with their rights and our obligations under the law.

Our address is 126, Bute Street, Cardiff CF10 5LE.

### Data Controller

The Data Controller is Simon White, Director, White Consultants: Environment Ltd.

### Lawful Basis

Simon White is a Data Controller as the director of a practice undertaking environmental consultancy services for clients including the public sector.

The lawful basis for collecting and storing data is a **contract basis** ie to fulfil contractual obligations.

We have **legitimate interests** in using contact data in the ways expected to carry out consultancy work, to bid for work and to inform existing, potential and past clients and colleagues of the work we are undertaking or related updates.

The data we hold is the minimum required to carry out our consultancy work but also to have a minimal privacy impact.

### Data Storage and Use

We use Outlook and Gmail email with a synchronised contacts list. We have a list of contacts for very occasional mail outs.

We hold the following information:

- Contact names, business addresses, business email addresses and business/mobile telephone numbers of clients, associated consultants,

- potential clients, public bodies and other parties involved in projects such as developers and their consultants.
- In exceptional cases home or private mobile telephone numbers and private email addresses if offered by clients or fellow consultants for ease/speed of contact.
  - Contact names of consultees and associated email addresses where consultation is required as part of a project.
  - Emails relating to projects undertaken.
  - Project documentation.

Simon White may share this information with his fellow director and project team in order to deliver projects as necessary but we do not share it with third parties. In emails sent to a number of unrelated recipients (ie not related to a specific project) we ensure email addresses are not revealed to other recipients.

The office computers and email accounts are password protected. The computers have firewalls and anti-virus and anti-malware programs with automatic updates. Our website is held on a secure server. Our procedures protect data by design and default.

The time limit for data held is the length of time the information is required to carry out the work of the practice and/or to fulfil contractual obligations.

## **Consent**

Every individual on White Consultants' contact list will give specific consent to the storage of their contact data by responding positively to an email message asking for consent and informing them of their rights to opt-out freely, request their data, or have their data deleted.

The details of those not involved in a current project that do not reply or those that reply in the negative under GDPR will not have their data stored in contact lists although their names may remain in stored project files such as meeting minutes.

A record of all consent given by each individual will be stored on a dedicated database for future reference. Consent can be withdrawn at any time by the individual.

## **Subject Access Requests**

If a contact requests access to their data, the following steps will be taken:

- Simon White will examine the request and verify whether or not data is being stored in any form regarding that individual.

- If so, the request of the individual will be implemented. If not, a response will be provided outlining what steps have been taken to check the data we hold to verify this.
- Simon White will endeavour to respond to requests within one month.
- A record of the request will be kept.

### **Website Cookies**

We collect standard internet log information to track the behaviour of visitors to the White Consultants' website. We do this to receive information on activity such as the number of visitors to our site. This information is collected in a way which does not identify individuals. We make no attempt to find out the identities of those visiting our website and we do not associate any data gathered from the site with any personally identifying information from any source.

We collect this standard information by using Google Analytics 'cookies'. A cookie is a small file placed on a user's computer by a website. Cookies are widely used to make websites function properly, work more efficiently or to provide information to the owners of the site.

By using the website the user accepts the terms of this privacy statement and the terms and conditions on the website.

### **Awareness**

White Consultants staff have a copy of this policy and we have discussed it in detail to ensure everyone understands the requirements.

### **Review**

This policy and practices will be reviewed annually to ensure they remain fit for purpose or as required by legislation.

### **Supervisory authority**

We are registered with the ICO who are the supervisory authority.

Information Commissioner's Office – Wales  
2nd Floor, Churchill House  
Churchill Way  
Cardiff  
CF10 2HH

Tel: 029 2067 8400  
[wales@ico.org.uk](mailto:wales@ico.org.uk)