

## PRIVACY POLICY

whiteBOX Architects is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our services, then you can be assured that it will be used in accordance with this statement.

This privacy policy sets out how whiteBOX Architects uses and protects any personal data that you share with us about you, and how we collect, process, protect and share that data.

### WHAT PERSONAL DATA WE COLLECT?

We may collect following information:

- Name and job title
- Contact information including email address
- Demographic information such as post code, preferences and interests
- Details of your property and land ownership
- Any other information relevant to your project such as the existence of any hidden services, way-leave, easements or covenants which may impact on the design or later construction of the project.

### WHAT WE DO WITH THE INFORMATION WE GATHER?

We require this information to understand your needs and provide you with a better service and, in particular, for the following reasons:

- Internal record keeping
- Improvement of our services

### SHARING INFORMATION

We will keep the information about you confidential and we will not give your information to other third parties without your express consent with the exception of the following categories of third parties.

- Insurance companies, loss assessors, regulatory authorities and other fraud prevention agencies for the purposes of fraud prevention and to comply with any regulatory issues and disclosures;
- Any mailing or printing agents, contractors and consultants that provide a service to us or act as our agents on the understanding that they keep the information confidential;

- Anyone to whom we may transfer our rights and duties under any agreement we may have with you;
- Any legal or crime prevention agencies and/or to satisfy any regulatory request if we have a duty to do so or if the law allows us to do so;

Our website is hosted by 123 Reg. Their privacy policy can be read at <https://www.123-reg.co.uk/terms/privacy.shtml>

## **HOW LONG DO WE KEEP THIS INFORMATION ABOUT YOU?**

We keep your personal data for no longer than reasonably necessary, but it may be for a period of 6 or 12 years beyond the end of the contract with you. For accounting purposes, we must keep records for 6 years from the end of the last company financial year they relate to. For contracts under seal, details need to be kept for 12 years for legal purpose. These retention periods are in line with the length of time we need to keep your personal information to manage and administer your project and handle any insurance claims or request for assistance made by our Professional Indemnity insurers. They may also take into account our need to meet any legal, statutory and regulatory obligations. In all cases, our need to use your personal data will be reassessed on a regular basis and information which is no longer required will be disposed of securely.

## **SECURITY**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. All our systems are password protected, including our wireless network.

## **COOKIE USAGE**

Our website does not use cookies to collect data.

## **LINKS TO OTHER WEBSITES**

Our website contains links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over any other websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites, and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **DATA SUBJECT RIGHTS**

### **SUBJECT ACCESS REQUESTS**

The General Data Protection Regulation (GDPR) grants you (hereinafter referred to as the "data subject"), the right to access particular personal data that we hold about you. This is referred to as a Subject Access Request. We shall respond promptly, and certainly within one month from the point of receiving the request and all necessary information from you. Our formal response shall include details of the personal data we hold about you, including the following:

- Sources from which we acquired the information;
- The purposes for processing the information;
- Persons or entities with whom we are sharing the information;
- Right to rectification

You, (the data subject), shall have the right to obtain from us, without undue delay, the rectification of inaccurate personal data we hold concerning you. Taking into account the purposes of the processing, you, (the data subject), shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### **RIGHT TO ERASURE**

You, (the data subject), shall have the right to obtain from us the erasure of personal data concerning you without undue delay.

### **RIGHT TO RESTRICTION OF PROCESSING**

Subject to exemptions, you, (the data subject), shall have the right to obtain from us restriction of processing where one of the following applies:

- a) The accuracy of the personal data is contested by you, (the data subject), and is restricted until the accuracy of the data has been verified.
- b) The processing is unlawful and you, (the data subject), oppose the erasure of the personal data and instead request the restriction on its use;
- c) We no longer need the personal data for the purposes of processing, but it is required by you, (the data subject), for the establishment, exercise or defence of legal claims;
- d) You, (the data subject), have objected to processing of your personal data pending the verification of whether there are legitimate grounds for us to override these objections.

## **NOTIFICATION OBLIGATION REGARDING RECTIFICATION OR ERASURE OF PERSONAL DATA OR RESTRICTION OF PROCESSING**

We shall communicate any rectification or erasure of personal data or restriction of processing as described above to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We shall provide you, (the data subject), with information about those recipients, if you request it.

## **RIGHT TO DATA PORTABILITY**

You, (the data subject), shall have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable-format and have the right to transmit this data to another controller, without hindrance from us.

## **RIGHT TO OBJECT**

You, (the data subject), have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you, including any personal profiling, unless this relates to processing that is necessary for the performance of a task carried out in the public interest or an exercise of official authority vested in us. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of you, (the data subject), or for the establishment, exercise or defence of legal claims.

## **RIGHT TO NOT BE SUBJECT TO DECISIONS BASED SOLELY ON AUTOMATED PROCESSING**

We do not carry out any automated processing which may lead to an automated decision based on your personal data.

## **INVOKING YOUR RIGHTS**

If you would like to invoke any of the above data subject rights with us, please write to 22 Newbridge Road, Bath BA1 3JZ or email [mail@whitebox-architects.co.uk](mailto:mail@whitebox-architects.co.uk)

## **ACCURACY OF INFORMATION**

In order to provide the highest level of customer service possible, we need to keep accurate personal data about you. We take reasonable steps to ensure the accuracy of any personal or sensitive information we obtain. We ensure that the

source of any personal data or sensitive information is clear, and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information, such as name or address changes and you can help us by informing us of these changes when they occur.

## **IMPORTANT INFORMATION**

### **QUESTIONS AND QUERIES**

If you have any questions or queries which are not answered by this Privacy Policy, or have any potential concerns about how we may use the personal data we hold, please write to 22 Newbridge Road, Bath BA1 3JZ or email [mail@whitebox-architects.co.uk](mailto:mail@whitebox-architects.co.uk)

## **POLICY CHANGES**

This Privacy Policy is regularly reviewed. This is to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this Policy. We suggest that you review this Privacy Policy from time to time to ensure you are aware of any changes we may have made, however, we will not significantly change how we use information you have already given to us without your prior agreement. The latest version of this policy can be found at [www.whitebox-architects.co.uk](http://www.whitebox-architects.co.uk)

## **IF YOU HAVE A COMPLAINT**

If you have a complaint regarding the use of your personal data or sensitive information then please contact us by writing to 22 Newbridge Road, Bath BA1 3JZ or email [mail@whitebox-architects.co.uk](mailto:mail@whitebox-architects.co.uk) and we will do our best to help you.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioner's Office (ICO), you can contact them on 01625 545745 or 0303 123 1113. You also have the right to judicial remedy against a legally binding decision of the ICO where you consider that your rights, under this regulation, have been infringed as a result of the processing of your personal data. You have the right to appoint a third party to lodge the complaint on your behalf and exercise your right to seek compensation