

Privacy Policy and GDPR Obligations

1. Who are we?

Cornwall Environmental Consultants (CEC) Ltd, is the trading arm of Cornwall Wildlife Trust (a registered charity). We are a not-for-profit organisation and all profits made are covenanted to Cornwall Wildlife Trust to aid its efforts in wildlife conservation in Cornwall.

CEC provides environmental consultancy services which include ecology, landscape and arboriculture services, across the South West of England.

As a business, we seek to build long term relationships with our clients and other stakeholders. This means providing a professional, high quality range of environmental consultancy services to such clients grounded in the principles of responsiveness, accountability, transparency and mutual respect.

2. Our Commitment to your Privacy

CEC holds and processes data so that we can deliver our services effectively. The majority of data we process is business contact details but can on occasion include personal data.

We collect, hold and process data for project management reasons (eg.. arrangement of a survey), to build and maintain relationships; to secure the resources we need to deliver our services; to provide a strong evidence base for our work; to keep our staff, subcontractors and service users safe and to meet our legal and contractual obligations.

We are committed to gathering and processing personal data with full regard for the General Data Protection Regulations (GDPR), the Privacy and Electronic Communications Regulations (PECR) and to the principles of personal choice and control, transparency, fairness and security. We always collect and process data on lawful grounds to meet the genuine needs of our business, but we do so with the highest regard for an individual's rights and freedoms.

We only share information when it is absolutely necessary to meet our business requirements and legal obligations and only with strict controls and data sharing and processing agreements in place. We will never sell personal data to third parties.

We are committed to keeping data safe. This Policy explains how and why we use your personal data, to ensure that you remain informed and in control of your information. For more information about your rights with regards to personal data, please contact the Information Commissioner's Office (www.ico.org.uk).

3. Key terms in this document

Any references to Cornwall Environmental Consultants, CEC or to 'we' or 'us' in this and Related Policies refer to Cornwall Environmental Consultants Ltd - a registered business and a company limited by guarantee and registered in England (Reg No. 2634834)

We use the following key definitions to describe people mentioned in this document. These are definitions used by the Information Commissioner's Office (ICO).

- **'Data subject'**: this is you, one of our valued clients/stakeholders. As the data subject, we respect your right to control your data.
- **'Data controller'**: this is us, Cornwall Environmental Consultants Ltd. With your permission, we determine why and how your personal data is used (as outlined in this document).
- **'Data processor'**: this is a person, or organisation, who processes your data on our behalf, with your permission. For example, this might be a sub-contractor who needs to arrange access for a survey.

When we work with other organisations or individuals in this way, we always set up a written contract with them to protect your data. The third parties we work with at no point 'own' your data, so you will never hear from them independently and they will always undertake to delete your data from their systems when they have completed the task in hand. We always send your data to

partner organisations securely, to minimise the risk of it being intercepted by unknown individuals and/or organisations.

4. Why do we collect your personal data?

We use your business/personal data to keep in touch with you, arrange survey requirements or other uses relating specifically to the service you have commissioned us to provide.

We will only ever collect, store and use your personal data when we have an identified purpose and reason to do so. The ICO refers to this as a 'lawful basis'. Further information about why we collect your personal data is outlined below.

a) To administer your requirements

We collect your personal data to administer your requirements for our services, which may involve:

- Contacting you to gain more details about your project/requirements
- Sending you a quotation and subsequent correspondence should we be commissioned
- Sending you an invoice
- Keeping your personal details up to date

The ICO define the lawful basis for processing your data for these purposes as '**contractual**'.

b) To send you services purchased from us (i.e. survey report, mapping etc)

We collect your business/personal data to send you:

- services you have purchased
- information about events/seminars you have booked onto

The ICO defines the lawful basis for processing your data for these purposes as '**contractual**'

c) To administer and acknowledge payments you have made to us

We collect your business/personal data to:

- process any payments
- acknowledge receipt of any payments

The ICO define the lawful basis for processing your data for these purposes as '**contractual**'

d) To deliver services that you have asked for

We collect business/personal data to:

- provide funded or charged services – such as ecology, landscape and arboricultural services
- process any payments related to these services
- process any monitoring information related to these services

The ICO define the lawful basis for processing your data for these purposes as '**contractual**'.

Where it is a contractual requirement to share your personal data with third parties – such as regulatory bodies – we will always make this clear when we first collect information from you.

e) To send you information about our work and ask for your opinion

We also collect your personal data so that we can send you information about our work that we feel will be of interest to you. This includes our twice yearly newsletter, information about events & seminars, our projects, services, feedback, sending you a customer feedback survey, sending you a case study and/or reference for approval for use for marketing and promotional purposes and other activities.

This information is in addition to that outlined in sections a), b), c) and d) and is defined as 'direct marketing' by the ICO.

As defined by the ICO, we use two different lawful bases for processing your data for '**direct marketing**' purposes:

i) Legitimate interest

This is where we have identified a genuine and legitimate reason for contacting you, which crucially does not override your rights or interests.

We use legitimate interest to send you the information listed above by email, post or telephone (if you are not registered with the Telephone Preference Service, and you have given us your telephone number).

ii) Opt-in consent

This is where you have given us express permission to contact you by particular communication channels. We use opt-in consent to send you the information listed above by email, post or telephone (if you are not registered with the Telephone Preference Service).

We respect your right to update the way we get in touch with you about our work at any time.

f) To enable you to volunteer with us

If you have sent us a CV or letter asking for work experience, shadowing opportunities or to offer your services voluntarily.

5. What kind of personal data do we collect? How do we collect it?

a) Basic information

We will usually collect basic information about you, including your name, postal address, telephone number and email address.

Most of the time, we collect this data from you directly. Sometimes this is in person; other times, it is over the telephone, in writing, through an email or direct contact via social media channels.

Other ways in which we collect personal data to get to know you better include:

b) Our website

Our website uses 'cookies' to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites.

Our cookies help us:

- Make our website work as you'd expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you

For more information on our Cookies Policy, see the end of this document.

c) Sensitive personal data

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation). However, there are some situations where this will occur. For example, if we are delivering a project that is specifically aimed at benefitting people's health or which targets particular groups of individuals (such as people from diverse backgrounds or with specific ethnicities).

When we do so, we will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission. In these situations, we collect the data from you directly. Generally, we anonymise sensitive personal data wherever possible.

We may also collect sensitive personal data if you have an accident and we are present at the time. This information will be retained for legal reasons, for safeguarding purposes and to protect us (including in the event of an insurance or legal claim). If this does occur, we'll take extra care to ensure your privacy rights are protected.

6. How do we store your data?

a) Security

All of the business/personal data we process is processed by our staff in the UK. However, for the purposes of IT hosting and maintenance your information may be situated outside of the European Economic Area (EEA). This will be done in accordance with guidance issued by the Information Commissioner's Office.

We use a Customer Relationship Management database called Really Simple Systems for e-mail marketing and monitoring our client contact. A copy of their policy regarding data security in terms of operational security, physical security and application security can be found here <https://www.reallysimplesystems.com/privacy-policy/>

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a clear Data Protection Policy and associated guidance which personnel are required to follow when handling personal data.

f) Data retention policy

We will only use and store information for as long as it required for the purposes it was collected for. We continually review what information we hold and delete what is no longer required.

7. Data sharing

We sometimes need to share the personal information we process. Where this is necessary we, and any third parties we share with, are required to comply with all aspects of the General Data Protection Regulations (GDPR). Sharing is always subject to a lawful basis for processing.

We will never sell personal details to third parties.

Organisations that we share data with include:

- Our approved subcontractors – for example, for the purposes of project delivery;
- Legal/compliance bodies where required – insurers, auditors, pension provider, HMRC, Fundraising Regulator, ICO;
- Statutory bodies or agencies – for example, to respond to legal issues and risks;
- Healthcare, social and welfare organisations – to manage and safeguard the wellbeing of our staff, volunteers and beneficiaries;
- Educators and examining bodies – for example, where we are supporting trainees;
- Current, past and prospective employers – for example, to provide references;
- Survey or research organisations – for example, to verify species records.

When we work with other organisations or individuals in this way, we must always set up a written contract with them to protect personal data – Data Processing and/or Data Sharing Agreements. The third parties we work with at no point 'own' an individual's data, must never contact the individual outside of their agreement with us and must always delete this data from their systems when they have completed the task in hand. We must always send data to partner organisations securely, to minimise the risk of it being intercepted by unknown individuals and/or organisations.

8. Your rights

We respect your right to control your data. Your rights include:

a) The right to be informed

This privacy notice outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.

b) The right of access

If you wish to obtain a record of the personal data we hold about you, through a Subject Access Request, we will respond within one month. To make a Subject Access Request, please contact our Business and Marketing Manager..

c) The right to rectification

If we have captured information about you that is inaccurate or incomplete, we will update it.

d) The right to erase

You can ask us to remove or randomise your personal details from our records.

e) The right to restrict processing

You can ask us to stop using your personal data.

f) The right to data portability

You can ask to obtain your personal data from us for your own purposes.

g) The right to object

You can ask to be excluded from marketing activity.

h) Rights in relation to automated decision making and profiling

We respect your right not to be subject to a decision that is based on automated processing.

For more information on your individual rights, please contact the Information Commissioner's Office.

9. Making a complaint

Cornwall Environmental Consultants Ltd want to exceed your expectations in everything we do. However, we know that there may be times when we do not meet our own high standards. When this happens, we want to hear about it, to deal with the situation as quickly as possible and put measures in place to stop it happening again.

We take complaints very seriously and we treat them as an opportunity to improve and strengthen our relationship with our clients. This is why we are always very grateful to hear from people who are willing to take the time to help us improve.

Our policy is:

- To provide a fair complaints procedure that is clear and easy to use for anyone wishing to make a complaint.
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint.
- To make sure everyone in our company knows what to do if a complaint is received.
- To make sure all complaints are investigated fairly and in a timely way.
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired.
- To learn from complaints and feedback to help us to improve what we do.
- Confidentiality

All complaint information will be handled sensitively, in line with relevant data protection requirements.

You can find our Complaints Procedure [here](#)

Responsibility

Overall responsibility for this notice and the implementation of our Data Protection Policy lies with the Managing Director.

Information Commissioner's Office

For further assistance with complaints regarding your data, please contact the Information

Commissioner's Office, whose remit covers the UK.
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Telephone: 0303 123 1113
Email: casework@ico.org.uk

10. Leaving our website

We are not responsible for the privacy practices or the content of any other websites linked to our website. If you have followed a link from this website to another website you may be supplying information to a third party.

11. Get in touch

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact us:

Business and Marketing Manager
Telephone: +44 1872 302267
Email: enquiries@cecenvironment.co.uk

Address: Cornwall Environmental Consultants
Five Acres
Allet
Truro
Cornwall
TR4 9DJ

Our office hours are Monday – Friday 8:30am – 4:30pm.

12. Our use of cookies

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites.

Our cookies help us:

- Make our website work as you'd expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you

We do NOT use cookies to:

- Collect any personally identifiable information (without your express permission)
- Collect any sensitive information (without your express permission)
- Pass personally identifiable data to third parties
- Pay sales commissions

You can learn more about all the cookies we use below

There are two types of cookie you may encounter when using this site:

First party cookies: these are our own cookies, controlled by us and used to provide information about usage of our site.

Third party cookies: these are cookies found in other companies' internet tools which we are using to enhance our site.

First party cookies

This site uses cookies in several places – we've listed each of them below with more details about why we use them and how long they will last.

Cookies set by this website

Name	Purpose	Typical content	Expires
SESSxxxID	Authentication session to prevent having to login multiple times in one browser session. This is only set if you authenticate via the site. This may happen if you purchase items from the shop or make use of our commenting	A unique id that ties the current session to a database settings table	One week
has_js	This helps the website understand browser Javascript functionality	An on/off flag that denotes whether or not the browser supports Javascript	On site exit
Online forms	NO_CACHE	This cookie is essential for our webforms to operate. It is set only for those people using the form, and prevents the browser from storing the information you enter. This cookie is deleted when you close your browser.	NA
Cookie_agreed	This cookie collects information about whether or not the user has agreed to cookies.	Yes/No	100 days

Third party cookies

We use a number of suppliers who may also set cookies on their websites' on its behalf. This site does not control the dissemination of these cookies. You should check the third party websites for more information about these.

Provider	Name	Purpose	More info
Google Analytics	_utma _utmb _utmc _utmz	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 in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	Google Privacy policy
Add this	_atuvc xtc uid uvc uit psc	These cookies are created by the AddThis social sharing site. AddThis does collect some information such as which web page you came from, which type of browser you are using, and your general geographic location. If you use the AddThis tool to share content they aggregate data about what pages are shared, when, and how. They also assign your web browser a unique identifier. This ID doesn't, and can't, say anything about you, it's a random series of numbers and letters used to distinguish users from each other.	Add this Privacy Quick Summary Add This Privacy Policy Add This Data

Provider	Name	Purpose	More info
			Collection Opt-Out
FontDeck		Fontdeck sets a single session cookie for each font requested. Each cookie contains (nothing but) a random string used solely as part of our caching and font security measures. The cookies are removed as soon the browser is closed (or the session otherwise ends). They contain no personal information and are not used for gathering analytics or tracking at a personal or aggregate level. Their sole purpose is to check whether we should serve the webfont from cache or not.	FontDeck Privacy Policy
Wufoo	wildlifetrusts40	This is a session ID cookie used identify unique visitors completing forms on our site. If you have your browser set to reject cookies the forms may not work correctly.	Wufoo Privacy Policy

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.allaboutcookies.org

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

YouTube cookies

We embed videos from YouTube. This may set cookies on your computer, particularly if you are logged into a Google or YouTube account. To find out more, please visit [YouTube's embedding videos information page](#).