



[www.turnpike.org.uk](http://www.turnpike.org.uk)

## **Turnpike Hill Trust (THT) Privacy Notice**

Welcome to the privacy notice of Turnpike Hill Trust (THT)

This notice tells you what we do with personal data relating to the users of our services as well as data that is processed by us in providing those services, in particular the personal data of our proprietors. It also tells you what we do with personal data collected through our website, including cookies and applications submitted through website forms.

THT takes your privacy very seriously. We ask that you read this privacy notice carefully as it contains important information about what to expect when we collect and process your personal data and how we will use your personal data.

The websites THT.org.uk [www.turnpike.org.uk](http://www.turnpike.org.uk) is operated by THT, a not-for-profit organisation at P.O. Box 291, Croydon CR9 5DH.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing your personal information so that you are fully aware of how and why we are using your data. This privacy notice supplements any other notices and is not intended to override them.

This privacy notice has the following headings:

- Data controller and how to contact us
- Your duty to inform us of changes
- The information we collect about you
- How is your personal data collected?
- How we will use your data
- When we will disclose your data to third parties
- Cookies and other information-gathering techniques
- How we protect your data
- Your rights
- Links to other sites
- Changes to our privacy notice

## **Data controller and how to contact us**

THT is the data controller and responsible for your personal data (collectively referred to in this privacy notice as THT, “we” “us” or “our”).

We have appointed a data protection officer for overseeing questions in relation to privacy matters. If you have any questions about this privacy notice, including any requests to exercise your data protection rights, please contact them using the details set out below.

**Email:** info@hmlgroup.com

**Phone:** 01737333780

**Write:** Famil Ismailov (DPO), C/O HML Group, 94 Park Lane, Croydon, CR0 1JB.

## **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **The information we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, such as:

- **Identity Data** includes first name, last name, username, and email address.
- **Contact Data** includes country of residence, phone number, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, settings, cookie data, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password (if you have been given one), interests, preferences, feedback, survey responses and training received.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing communications and your communication preferences.

We may also use aggregate information and statistics for the purposes of monitoring website usage in order to help us to develop our website. Aggregate information may be derived from your personal data but is not considered personal data in law as this data does not directly or

indirectly reveal your identity. We may also provide such aggregate information to third parties. If we do combine or connect any aggregate information with your personal data so that it can identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about users (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **How is your personal data collected?**

We use different methods to collect data from and about you, including through:

- **Direct communications.** When you input your details to raise a query; we collect your Identity Data, Contact Data and Profile Data.
- **Automated technologies.** As you interact with our website, we automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data using cookies, server logs and other technologies. Please see section 8 below and our Cookies policy for further details.

### **How we will use your data**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. You can contact us for more information about this. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We will retain and process your data for as long as we require it for the purposes for which it was collected or as is otherwise required by applicable law. To determine the appropriate retention period for your personal data, we consider the amount, nature and sensitivity of the personal data, the risk of potential harm from its unauthorised use or disclosure, the purposes for which we process it, whether we can achieve our purposes through other means, and the applicable legal requirements.

In respect of proprietor data, we will delete this data:

- 7 years after formal notification that you are no longer an owner on the estate.

Once your personal data is no longer needed, we will securely delete or anonymise it. We may continue to use anonymised data, which cannot be associated with you, for research or statistical purposes.

### **When we will disclose your data to third parties**

We will not sell, exchange or otherwise distribute your personal data to unaffiliated third parties without your consent, except to the extent required by applicable laws and regulations, or as set out in this privacy notice.

We may share data we collect with any related company (or other incorporated or unincorporated entity) within our corporate group and with selected third parties including:

- our stakeholders (including local authorities, safer neighbourhood teams and the police as requested);
- Other key suppliers (managing agents and parking provider), in order to provide our services (for example where we enter into agreements with third parties who provide services to us or on our behalf); and
- analytics and search engine providers that assist us in the improvement of our website and the services we provide.

We may also disclose data we collect to third parties:

- if we undergo a change of control;
- if we are under a duty to disclose or share your information in order to comply with any legal obligation or legal process (for example, a court order), or in order to enforce or apply our contractual rights or any other agreement; in order to protect the rights, property, or safety of our website users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Cookies and other information-gathering techniques**

Our website uses cookies. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. These cookies allow us to distinguish you from other users of our website which helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

For more information on our use of cookies, see our Cookies policy on our website.

### **How we protect your data**

We will use all reasonable efforts to safeguard your personal data and we have put in place security procedures and technical and organisational measures to do so, including

encryption. In addition, we limit access to your personal data to those agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## Your rights

In some circumstances you have rights in relation to the personal data we hold about you. Please contact us using the contact details above if you wish to exercise any of these rights.

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

You will not usually have to pay a fee to exercise these rights but if your request is clearly unfounded, repetitive or excessive, we may charge a reasonable fee (or refuse to comply with your request).

We may need specific information from you to help us confirm your identity and to speed up our response; this helps keep your personal data safe and speeds up our response to your request. We try to respond to all legitimate requests within one month but this period may be longer if your request is particularly complex or you have made multiple requests; we will notify you in this case.

If we are only a data processor in respect of the data to which your request relates, we may not be able to comply with that request and will redirect you to the relevant data processor.

### **Links to other sites**

Our website may contain links to other sites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. This privacy notice applies only to this website so when you access links to other sites you should read the privacy notice applicable to that site.

### **Changes to our privacy notice**

We keep this privacy notice under regular review. If we change our privacy notice, we will post the changes on this page, and may place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times.

**Updated:** 16 August 2018