

Daniel Ratcliffe T/A 'Statement Heritage' Privacy Policy

V1. 24/11/2021

Our contact details

Daniel Ratcliffe T/A Statement Heritage

69 John Street, Penicuik, EH26 8HL

Tel: 07876 266 043

E-mail: daniel.ratcliffe@statement-heritage.com

The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics
- Personal and business names, emails, telephone numbers and addresses of clients, referring business and freelance associates
- Website user statistics
- Photographs of buildings and landscapes which may contain personal data of both clients and uninvolved third par– you can find out more about our specific practices for collecting and processing photographic data in **Appendix 1** below

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- So we can provide clients with our services.
- In connection with research or provision of our services (for example when we contact third parties to assist with our work).

We also receive personal information indirectly, from the following sources in the following scenarios:

- Where it is provided by businesses, we work with who refer you to us to offer or provide you with our services.

We use the information that you have given us in order to provide quotes for, or deliver our services.

We may share essential contact information, with your explicit permission, with freelance associates working for us, for the purposes of arranging site visits. Otherwise we will not

share your contact details with anyone except with the Small Claims Court in the event of contractual breaches.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information include circumstances where:

We have a contractual obligation (where we are proposing or delivering projects on your behalf)

We have a legal obligation (where we are required to collect your data for compliance with the law e.g. in maintaining records for the purposes of reporting to HMRC)

We need it to perform a public task (for instance where we include photographs containing your personal data in documents required for the operation of matters falling under the Planning Acts)

We have a legitimate interest (for instance our own business purposes and where reports are archived for the purposes of future historical research)

And where not otherwise covered above, where we have your explicit consent

How we store your personal information

Your information is securely stored electronically by in encrypted and password protected systems maintained by Google – further information regarding these systems is available at <https://cloud.google.com/privacy/gdpr>

We keep client details as part of business records for 5 years. We will then dispose your information by deleting this information from our local and cloud systems. Project reports, and our research and photographic archives, in which personal data is audited and redacted wherever possible may be archived for longer periods and shared with county and national archives and local planning departments for the historic record.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at the above contact details if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at the above address.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Appendix 1:

Statement Heritage Fieldwork Privacy Policy and contact details

Data Controller: Daniel Ratcliffe MA MCIfA T/A 'Statement Heritage'

<https://uk.linkedin.com/in/daniel-ratcliffe-13b26755>

daniel.ratcliffe@statement-heritage.com

www.statement-heritage.com

[07876 266 043](tel:07876266043)

'Statement Heritage' assists its clients, who include private property owners, local authorities, government agencies and charities, to assess the significance of the historic environment (Listed Buildings, Conservation Areas, World Heritage Sites, Scheduled Monuments and 'locally listable' buildings and archaeological features without heritage designations). Our research informs management plans, and capacity and impact assessments that help people better care for the heritage value of these places. We aim to ensure all Statement Heritage work, including that undertaken on its behalf by freelance partners, is undertaken to the highest professional and ethical standards, putting the conservation of the historic environment, reliability, transparency and access at the heart of this work.

In the course of *Statement Heritage's* work, which can include preparing documents to inform conservation management plans, planning applications and listed building consent applications, we gather data (including from public places and, with permission from private land, and sometimes and in strict accordance with Civil Aviation Authority rules and relevant laws, using aerial photography) including digital photographs, drawings and written observations about the places we are working with. In doing so we aim to be compliant at the point of capture, and in any subsequent processing and storage of this data with the General Data Protection Regulations, and as such I have developed specific processes for understanding how we should handle any 'personal data' (data about living individuals).

Where our data collection affects the homes or workplaces of clients or areas of residential development in private domestic occupation we have identified a potential for the inadvertent capture of sensitive personal data. We aim to avoid the capture of personal data wherever possible however, when such data appears in our records inadvertently or unavoidably we have identified that our 'lawful basis' for collecting such data as identified in GDPR supporting guidance includes 'Contract' (being our contract with client), 'Public task' (being the support of the implementation of conservation of buildings identified under the 1990 Planning (Listed Buildings and Conservation Areas Act), and 'Legitimate interests' including our commercial interest and the interests of historic research. Photography collected for our work is processed before its transfer to networked drives and sharing with others to remove personally identifiable data relating to both clients and uninvolved third parties with particular attention paid to: sensitive personal effects, identifiable faces, vehicle identification plates and other potentially sensitive data which might identify individuals or protected characteristics.

If, despite these steps you are concerned that your personal data, as identified in law, may have been captured by any of our activities you have the right to request its removal by contacting the 'data controller', Daniel Ratcliffe, using the contact details above, and clearly explaining your request.

Fieldwork Privacy Policy review v2.2 – 24/11/2021

Date: 24/11/2021