

## Privacy and Data Protection Statement

Acuity Research & Practice Ltd is committed to protecting your privacy. This policy explains how we collect and use the personal information you provide to us whether online or via phone, mobile, e-mail, letter or other correspondence.

By using our website, any of our services, or providing us with any personal information we will assume you are agreeing to your information being used and disclosed in the ways described in this policy.

### 1 GDPR

The **EU General Data Protection Regulation (GDPR)** effective from May 2018 gives all EU citizens more rights and protections for their personal data, to minimise the possibility of theft and fraud.

These regulations include provisions for the following areas:

- **The right to be informed:** Companies must publish a privacy notice, in addition to explaining transparently how they use this personal data.
- **The right of access:** Individuals will have the right to demand details of any of their data that a company may hold. This information must be provided within one month of request at no charge to the individual.
- **The right to rectification:** If a person's data is incorrect or incomplete, he or she has the right to have it corrected. If the company that holds the information has passed any of that information to third parties. The company must inform the third party of the correction and inform the person which third parties have their personal data.
- **The right to be forgotten:** A person may request the removal of his or her personal data in specific circumstances.
- **The right to restrict processing:** Under certain circumstances, an individual can block the processing of his or her personal data.
- **The right to data portability:** A person can access their data for their own use anywhere they prefer.
- **The right to object:** A person can object to the use of their personal data for most purposes.

**We operate our Data protection in compliance with BS 10012:217: Specification for a personal information management system. Specification for a personal information management system.**

#### a) Our core principles regarding user privacy and data protection

- User privacy and data protection are inviolable human rights
- We have a duty of care to people contained within our data
- Data is a liability: it should only be collected and processed when absolutely necessary
- We despise spam in all its forms
- We will never sell, rent or otherwise distribute or make public any personal information



## **b) Relevant legislation**

Alongside our business and internal computer systems, this Acuity's website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- [UK Data Protection Act 1998 \(DPA\)](#)
- [EU Data Protection Directive 1995 \(DPD\)](#)
- [EU General Data Protection Regulation 2018 \(GDPR\)](#)

This site's compliance with the above legislation, all elements of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (contact details at the end of this statement) for clarification.

## **2 Data Protection Act**

In carrying out our day to day activities we process and store personal information relating to our clients and we are therefore required to adhere to the requirements of the Data Protection Act 1998. We take our responsibilities under this act very seriously and we ensure the personal information we obtain is held, used, transferred and otherwise processed in accordance with that Act and all other applicable data protection laws and regulations including, but not limited to, the Privacy and Electronic Communication Regulations.

## **3 This website collects and uses personal information for the following reasons:**

This website collects and uses personal information for the following reasons:

### **3.1 Site visitation tracking**

Like most websites, this site uses Google Analytics (GA) to track user interaction.

We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to track their journey through the website.

Although GA records data such as your approximate geographical location, device, internet browser and operating system, none of this information personally identifies you to us.

GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 4 below).

GA makes use of cookies, details of which can be found on Google's developer guides.

[Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.](#)



## 3.2 Comments

Should you choose to add a comment to any posts that we have published any personal details you enter with your comment will be saved to this website's database, along with your computer's IP address and the time and date that you submitted the comment.

This information is only used to identify you as a contributor to the comment section of the respective blog post and is not passed on to any of the third party data processors detailed below.

Only your name will be shown on the public-facing website although if the supplied email address is linked to a [Gravatar](#) account, your [Gravatar](#) photo will also be displayed.

Your comment and it' associated personal data will remain on this site until we see fit to either:

remove the comment

or

remove the blog post

Should you wish to have the comment and it's associated personal data deleted, please email us using the email address that you used to comment.

## 3.3 Forms

We use online forms to help you contact us and to sell tickets to events. The information collected by these forms is sent to us via email and stored in the website's database, long enough to enable us to manage our processes.

We delete any information when it is no longer needed.

## 3.4 Events managers

Our website uses event management functionality to enable us to sell tickets to events and manage courses we offer.

Your information will be stored in the website's database to enable us to manage the event.

We delete any information when it is no longer needed.

## 3.5 Email newsletter

Acuity provides research, benchmarking and learning & development services to our customers and a key part of our service offer is that we keep customers informed about the latest research findings, benchmarking data, thinking and good practice using regular blogs and newsletter mailings.

If you choose to join our newsletter mailings (which is sent via email), the email address that you submit to us will be stored in our own SQL Server database.

Your email address will remain within our database on our website for as long as we continue to use this platform for email marketing or until you specifically request removal from the list.

You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by requesting removal via email. When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.



## **4 Information sharing and disclosure**

We will not sell or swap your information with any third party.

We may share your information with our data processors. These are trusted partner organisations that work with us in connection with our organisation's purposes. All our trusted partners are required to comply with data protection laws and our high standards and are only allowed to process your information in strict compliance with our instructions. We will always make sure appropriate contracts and controls are in place and we regularly monitor all our partners to ensure their compliance.

We may disclose your personal information to third parties if we are required to do so through a legal obligation (for example to the police or a government body); to enable us to enforce or apply our terms and conditions or rights under an agreement; or to protect us, for example, in the case of suspected fraud or defamation.

We do not share your information for any other purposes.

## **5 The accuracy of your information**

We aim to ensure that all information we hold about you is accurate and, where necessary, kept up to date. If any of the information we hold about you is inaccurate and either you advise us or we become otherwise aware, we will ensure it is amended and updated as soon as possible.

## **6 Storing your information**

All of the information we store and process stays within the UK.

We will keep your information for as long as required to enable us to operate our services but we will not keep your information for any longer than is necessary. We will take into consideration our legal obligations and tax and accounting rules when determining how long we should retain your information. When we no longer need to retain your information we will ensure it is securely disposed of, at the appropriate time.

## **7 Our website**

Our websites use cookies to help them work well and to track information about how people are using them. More information on cookies can be found below.

For all areas of our website which collect personal information, we use a secure server. Although we cannot 100 per cent guarantee the security of any information you transmit to us, we enforce strict procedures and security features to protect your information and prevent unauthorised access.

Our website contains links to other websites belonging to third parties and we sometimes choose to participate in social networking sites including but not limited to You Tube and Twitter. We may also include content from sites such as these on our website however, would advise that we do not have any control the privacy practices of these other sites. You should make sure when you leave our site that you have read and understood that site's privacy policy in addition to our own.

## **8 Cookies**

### **8.1 What are cookies?**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work better, as well as to provide information to the owners of the site. A cookie often contains a unique number, which can be used to recognise your computer when a user of your computer returns to a website that it visited previously.



## 8.2 How does Acuity use cookies?

We use cookies to enhance the online experience of our visitors, to better understand how our websites are used (see Google Analytics above)

## 8.3 Your rights

Our cookies do not store financial information or information which is capable of directly identifying you (such as your name or address). You have the right to choose whether to accept these cookies. You can exercise this right by amending or setting the controls on your browser to reflect your cookie preferences. However, please note that if you choose to refuse cookies you may not be able to use the full functionality of this website.

## 8.4 Changing your cookie preferences

The "Help" menu in the toolbar of most web browsers will tell you how to change your browser's cookie settings, including how to have the browser notify you when you receive a new cookie, and how to disable cookies altogether. An online guide is available if you have difficulties trying to change your browser settings.

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

## 8.5 Cookie terminology

We have classified our cookies into two broad types - 'first party cookies' and 'third party cookies':

- We use Google Analytics cookies which help us monitor the site and improve it to make your experience better.
- We also use some social media cookies which allow you to interact with our website through various social media sites such as Facebook, Twitter and You Tube.
- Our content management system will also set cookies without which the site could not function.

In addition, cookies may be either 'session cookies' or 'persistent cookies'. Your computer automatically removes session cookies once you close your browser. Persistent cookies will survive on your computer until an expiry date specified in the cookie itself, is reached.

We do not use third party cookies that track your usage this and other websites to serve advertising.

## 9 Data breaches

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Acuity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/>

Acuity's data breach policy may be found on our website here: <http://www.arap.co.uk/about/policy/>



## 10 Research Data

Acuity carries out research on behalf of our clients in order to help them improve services and engage with their residents. Clients provide us with personal data such as names and addresses to enable us to carry out this research. This data and the research findings are protected by the DPD, DPA and GDPR.

Acuity's Privacy and Data Protection Statement regarding Research Projects may be found on our website here: <http://www.arap.co.uk/resident-satisfaction-star-surveys-privacy-and-data-protection-policy/>

## 11 Changes to the policy

This policy replaces all previous versions and is correct as of at the end of this web page. We will regularly review and update this Privacy and Data Protection Statement and will update, modify, add or remove sections at our discretion. Any changes will be notified to you through on this page. Your continued use of our website, any of our services and/or the continued provision of personal information after we have posted the changes to these terms will be taken to mean you are in agreement with those changes.

## 12 Your rights

You have the right to:

- request a copy of the information we hold about you;
- update or amend the information we hold about you if it is wrong;
- change your communication preferences at any time;
- ask us to remove your personal information from our records;
- object to the processing of your information for marketing purposes; or
- raise a concern or complaint about the way in which your information is being used.

If you wish to find out more about these rights, or obtain a copy of the information we hold about you, please contact us at:

Acuity, 61 Surrenden Crescent, Brighton, BN1 6WE, 01273 287114, [acuity@arap.co.uk](mailto:acuity@arap.co.uk)

## 13 Privacy queries

If you have any questions or queries about this Privacy and Data Protection Statement, please contact our Data Protection Officer using the above address and contact details.

Acuity, 61 Surrenden Crescent, Brighton, BN1 6WE, 01273 287114, [acuity@arap.co.uk](mailto:acuity@arap.co.uk)

Last reviewed: May 2018

Next review: 30 September 2019