



Owen Devenport Ltd

Owen Devenport Ltd. is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after our working relationship with you, in accordance with the General Data Protection Regulation 2018 (GDPR) and related law.

Owen Devenport Ltd. is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of our terms and conditions or other contract to provide services.

We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long, as necessary for the purposes we have told you about;
- Kept Securely.

The Kind of Information We Hold About You

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Invoicing Details;
- Project Information Required;
- Name of company and location of work place.

How is your Personal Information Collected?

We collect personal information about you through our initial enquiry process with you, or through an enquiry directed to us by a third party on your behalf (such as from an Architect, Solicitor, specialist consultancy services, other professional advisors etc.) which is required in order to contact you about your enquiry and also to assess your needs for your project.



How Will We Use Information About You?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract that we have entered into with you;
- Where we need to comply with a legal obligation;
- Invoicing purposes;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Obtaining quotes on your behalf for other specialist services required for the planning matter/s that we are dealing with for you (for example obtaining quotes for the preparation of plans, ecological reports, drainage design etc.).

Situations in Which We Will Use Your Personal Information

- Determining the terms on which we work for you;
- Invoicing you;
- Liaising with your principal contact;
- Administering the contract that we have entered into with you;
- Business management and planning, including accounting and auditing, dealing with sub-consultants;
- Dealing with other companies providing other specialist services required to provide input on areas relevant to the planning matter we are addressing for you;
- Dealing with legal disputes involving you;
- To prevent fraud.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as opening a file, contacting you to advise of a project, sending you an invoice etc.), or we may be prevented from complying with our legal obligations (such as to provide accurate billing information for tax purposes).

Change of purpose

We will only use your personal information for the purposes for which we collected it. For an unrelated purpose we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.



How We Use Particularly Sensitive Personal Information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information.

In general we do not require sensitive personal information from our clients, and where such information is not required we will not seek it from you. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations and in line with our data protection policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent or where you have already made the information public.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Data-sharing

We may have to share your data with third-party service providers. The following activities are carried out by third-party service providers:

- Sub-consultants;
- Other consultants or firms where you require another service in order to support our planning work (such as from an Architect, Solicitor, specialist consultancy services, other professional advisors etc.);
- Planning Authorities and other public bodies involved in addressing planning matters (we are required to provide your personal information in order to identify the individual/s, company, or group on whose behalf we are acting as Agent);
- IT support.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal data outside the EU.

If we do, you can expect a comparable degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you, or where we have another legitimate interest in doing so.



Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of our retention periods are set out below:-

1. **Current & former clients** – Name, contact information, company details (where applicable), billing, and site information – 6 years from close of work on an instruction - In order to provide advice on planning decisions/matters and to comply with tax & company record requirements for billed work;
2. **Potential clients** – Name, contact information, company details (where applicable), and site information – 3 years from enquiry - In order to respond to follow on queries from client upon a quote;
3. **Objectors/commenters on planning work carried out on behalf of our client** – Name and contact information (where supplied), company details (where applicable) - 6 years from close of work on an instruction for our client - In order to provide advice on planning decisions/matters (related to 5 year life of a consent, plus 1 year);
4. **Supplier contact information** – Business contact name and contact information – 3 years - In order to allow re-contact after close of last work.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Rights of Access, Correction, Erasure, And Restriction

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

You have the following rights in respect of your data, and where you wish to exercise those rights you can do so by contacting us either in writing or by phone using the detail provided later in this document.

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.



If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us through any of the following methods:-

- info@owendevenport.co.uk and put GDPR Request in the subject line;
- Write to Owen Devenport, 5 Field Street, Llangefni, LL77 7EH; or
- Call us on 01248 724356.

We may need to request specific information from you to help us confirm your identity and ensure your right to exercise the above rights. This is an appropriate security measure to ensure that personal information is not disclosed or otherwise affected by any person who has no right to it.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us through any of the following methods:-

- info@owendevenport.co.uk and put GDPR request in the subject line;
- Write to Owen Devenport, 5 Field Street, Llangefni, LL77 7EH; or
- Call us on 01248 724356.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer

We have appointed a data protection officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact info@owendevenport.co.uk

Right to complaint to Information Commissioner's Office

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues – More details can be found at - <https://ico.org.uk/>

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions regarding our privacy notice please email - info@owendevenport.co.uk