# General Privacy Policy – Travel Plans

We are i-Transport LLP, a specialist transport planning practice and a Limited Liability Partnership registered in England under number OC311185 (Registered Office - 3rd Floor, One London Square, Cross Lanes, Guildford, Surrey, GU1 1UN). i-Transport is a Data Controller in relation to the data collected in connection with the Travel Plan services we provide to third parties as Travel Plan Coordinator for the development sites

This statement sets forth our privacy policy in relation to information we collect, describing the practices we follow to respect the privacy of all individuals. This policy is effective from 1 February 2022.

At i-Transport LLP we have focused on implementing fair information practices that are designed to protect your privacy. If you have questions or you do not feel that your concerns have been addressed in our privacy statement, or you just want to talk with us, feel free to contact us by email at enquiries@i-transport.co.uk

### **Data Protection**

### What data do we collect and how?

We collect personally identifiable information that is voluntarily provided by individuals through our engagement with them, such as by visiting our websites, responding to Resident Travel Surveys and other activities carried out during the course of our business – including through enquiry forms, survey forms and emails and through the collection of cookies ("User Data").

The User Data that i-Transport LLP receives may include name, title, address, email address, screen name, telephone and fax numbers, and any other information provided to us by individuals in email messages or attachments which may include banking details.

i-Transport does not use automated decision-making, including profiling.

## Why do we collect data?

User Data is collected in order to provide travel information services and meet requests for travel incentives which are being offered under the approved Travel Plans for third party development sites. We also collect travel data to understand how people travel at third party development site and how this changes over time (i.e. by which mode of transport) to help determine the success of the approved Travel Plans we are helping to implement.

It is i-Transport LLP's policy to limit the information collected to only the minimum information required. Where practical we will use anonymised data to carry out any travel plan monitoring and reporting.

## Collection of Sensitive Information

i-Transport LLP's intention is not to seek any sensitive information through our Site. Sensitive information includes a number of types of data relating to race or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual life, or criminal record.

### Use of User Data

To use your personal data for the purposes described in this privacy policy we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services.

i-Transport LLP makes every practical effort to avoid excessive or irrelevant collection of data. We will always obtain the minimum data needed to achieve this legitimate interest. If you believe we have collected excessive information, we encourage the you to contact us at enquiries@i-transport.co.uk to raise any concerns.

Except for instances where individuals explicitly choose to receive specific i-Transport LLP marketing or other informational materials, i-Transport LLP will not use personal data collected to distribute marketing or informational materials.

### Data Retention

If you submit data to us in connection with our services, we will store this data securely on our internal servers and retain this data for the minimum period required to achieve the purposes it was collected for.

For example, this will include:

- For travel vouchers, personal data including name, address, email address and bank details will be deleted 3 months after information has been provided by the individual. We will maintain a record of the plot number that has received the travel voucher for a period of 12 years.
- For any data collected via online questionnaires (e.g. Survey Monkey), personal data will be removed (or anonymised) 12 months after the deadline of any questionnaire.

Further details in relation to the retention of specific types of data are available on request.

## **Third Parties**

It is i-Transport LLP's policy only to disclose User Data to third parties under the following circumstances:

- when explicitly requested by the individual;
- when required to in order to provide specific services or meet legal obligations.

Categories of third parties that i-Transport may share personally identifiable information with include state, and local government entities. The need to transfer User Data outside the jurisdiction of UK GDPR (e.g., outside of the UK) will depend on the purpose of the data collection, and any transfers will be carried out in accordance with our legal obligations to maintain an appropriate level of data protection.

Where transfers to third parties are likely to occur given the purposes of the data collection, individuals will be notified at the point of collection in a relevant privacy statement or more detailed Privacy Policy (see, for example, our website Privacy Notice).

We do not collect or compile personally identifying information for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

## Your rights

You have various rights over the usage and storage of your data:

- A right to access (you have the right to request copies of your personal data and associated information about our processing activities)
- a right to **unsubscribe** from communications (withdrawing your consent for us to provide you with information)
- A right to **rectify** any inaccurate personal data held by us about you
- A right to **erasure** of personal data held by us about you
- A right to **object** to our processing of personal data held by us about you
- A right to ask us to restrict our processing of your personal data while we deal with certain concerns raised by you
- A right to **data portability** (you have the right to request that we transfer the data that we have collected to another organisation, or directly to you, under certain conditions).

Further information on the rights you have can be found at <a href="www.ico.org.uk">www.ico.org.uk</a>
Individuals wishing to exercise any of these rights should contact i- Transport LLP at <a href="mailto:enquiries@i-transport.co.uk">enquiries@i-transport.co.uk</a>

# Security

All i-Transport LLP members and employees are instructed to follow a practice-wide security policy. Only authorised personnel are provided access to personally-identifiable information and these employees are required to agree to ensure confidentiality of this information.

### Modifications

i-Transport LLP reserves the right to modify or amend this policy at any time. The effective date will be displayed at the beginning of this statement.

### **Further Information**

i-Transport LLP maintains more detailed privacy policies in relation to specific types of data collection. These are available on request, and from the relevant locations – such as the Privacy Policy located on specific websites.

If you have any concerns regarding our processing of your personal data, we would be happy to address your query in the first instance. However, if you are not satisfied with our handling of data or any request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their contact details can be found at <a href="https://www.ico.org.uk">www.ico.org.uk</a>