

Privacy Notice

Urban Foresight Limited respects your privacy and is committed to protecting your personal data. This privacy notice aims to give you information on how Urban Foresight Limited collects and processes your personal data, including, but not limited to, our website, when you supply to or from us as well as interacting with our services.

Urban Foresight Limited is registered with the Information Commissioners Office (ICO) as an organisation that processes personal data.

The company is committed to being transparent about how it handles your personal information, to protecting the privacy and security and to meeting its data protection obligations under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

The UK GDPR principles,⁵⁽¹⁾ underpins the heart of our approach to processing personal data:

- a) **Lawfulness, fairness and transparency** – Urban foresight will process personal data on a lawful basis and in a fair manner, employing transparency in relation to data subjects.
- b) **Purpose limitation** – Urban Foresight will collect data only for specific and legitimate purposes.
- c) **Data minimisation** – Urban Foresight will limit data collection and processing to what is necessary for a specific task.
- d) **Accuracy** – Urban Foresight will endeavour to keep records up to date, taking reasonable steps to ensure records are accurate. Requests for amendments or deletion sent to the data protection officer will be rectified promptly.
- e) **Storage limitation** – any data held by Urban Foresight will ensure it is held in an identifiable form for no longer than is necessary for the specific task.
- f) **Integrity and confidentiality** – Urban Foresight will take reasonable measures to ensure appropriate security of all data held.
- g) **Article 5(2) Accountability** – Urban Foresight shall be responsible for, and be able to demonstrate compliance for all the above principles.

Urban Foresight Limited understands its responsibilities and are committed to:

- processing data fairly and legally
- supporting the rights of individuals
- keeping personal data secure
- designing privacy into our systems and processes

1. Important information and who we are

Urban Foresight Limited delivers a range of products and services and as a consequence may process personal data as either a controller (Article 24 GDPR), joint controller (Article 26 GDPR) or processor (Article 28 GDPR). Our obligations under GDPR will vary depending on the appropriate role identified. In each instance, Urban Foresight Limited will strictly comply with its obligations under data protection law in relation to the processing of personal data and information.

Urban Foresight as Controller

Controller: *means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.*

Where we are identified as Controller, (under Article 24 UK GDPR), Urban Foresight Limited will determine the purposes and means of the processing of personal data and make decisions about processing activities. We are also responsible for ensuring any processing carried out by a processor on our behalf, complies with the UK GDPR

Our collection, use and disclosure and processing of personal information about individuals will vary depending upon the circumstances, (for example: surveys, workshops). This privacy notice is intended to describe our overall privacy and data protection practices. In some cases, different or additional notices about our data collection and processing practices may be provided and apply to our processing of certain personal information.

Urban Foresight as Joint Controller

Joint controllers: *Where two or more controllers jointly determine the purposes and means of processing.*

Where we are identified as Joint Controllers, (under Article 26 UK GDPR), Urban Foresight Limited will work together with the other joint controller to determine the purposes and means of being joint controllers and come to a transparent arrangement which sets out our agreed roles and responsibilities for complying with UK GDPR and transparency obligations to individuals' rights. For example, a specific central point of contact for individuals will be agreed, (whilst giving individuals the ability to exercise their rights against each controller). Details of this arrangement are made available to individuals and are included in relevant privacy information and notices.

Urban Foresight as Processor

Processor: *a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.*

Where we are identified as processors, (under Article 28 UK GDPR), Urban Foresight Limited will comply with our obligations under Data Protection Law in relation to the processing of personal data for the controller under an agreed contract.

The terms of our arrangement between the controller and Urban Foresight Limited will be made available to all individuals / data subjects, and ensure compliance with the UK GDPR and transparency obligations in all aspects of individuals' rights. We will include this in the project privacy information and individuals will be directed to the privacy information of the controller if necessary.

When working with individuals, transparency will be maintained and all information and communications relating to the processing of personal data will be accessible and easy to understand, with clear plain language used.

Transparency obligations of an individuals' rights will be ensured with roles and responsibilities regarding personal data processing and associated contractual arrangements between relevant organisations and Urban Foresight Limited available to all individuals / data subjects.

This website is not intended for children and we do not knowingly collect data relating to children

For the purposes of this privacy notice

Urban Foresight Limited is the controller of and responsible for:

- The use of our websites, marketing communications and associated services that link to this privacy notice.
- Our former, current and prospective clients, including information related to the points of contact.
- Individuals who communicate with us.
- Individuals who use our products and services, either for themselves on or behalf of an organisation or entity, and individuals whose personal information we receive in providing the services. This includes products, services, and websites made available through the use of authorised guest accounts or third party software.

Not covered by this notice

This privacy notice does not apply to job applicants who apply for employment with us or to our employees and non-employee workers whose personal information is subject to different privacy notices which are provided to such individuals in the context of their employment or working relationship with Urban Foresight, please refer to UF recruitment privacy notice.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in September 2023. 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.

Third-party links

This website may include links to third-party websites, 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. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data 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).

Types of Data

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, cookies, browser plug-in types and versions and other technology on the devices you use to access this website.

'Special category' data we will collect

We may also collect additional personal information in providing our services, business operation, and interacting with individuals. This may at times include “sensitive” information (otherwise known as “special categories of personal information” under the General Data Protection Regulations, “sensitive personal data” such as 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). Special category requires a higher level of protection because it is of a more sensitive nature. Where required by law, we will provide specific data processing information and privacy notice to you regarding how we may process that data and what rights you may have regarding such processing.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data 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. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it directly or indirectly identifies you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated to an individual, in which case we may use it without further notice to you.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you via:

- **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Engage us to provide services or we engage you to provide products or services to us.
 - Request marketing to be sent to you.
 - Take part in a project survey.
 - Attend a workshop or other in-person event.
 - Attend an online event (e.g. webinar).
 - Make an enquiry through our website, by email or telephone.
 - Give us feedback or contact us.
 - Allow us to film or photograph you as part of an event.
 - In social media posts.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

- Technical data from analytics providers such as Google based outside the UK/EU
 - Financial and transaction data from banks based inside or outside the UK/EU
 - Identity and contact data from publicly available sources such as Companies House based inside the EU and/or public websites which display information about you, such as LinkedIn.
- **Automated technologies or interactions (Cookies).** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For more information about the cookies we use, please see our [cookie policy](#).

4. How we use your personal data

We will only use your personal data when the law allows us to, in full compliance with the GDPR principles, individual rights and our accountability obligations. Most commonly, we will use your personal data in the following circumstances:

- **Contract:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate Interest:** When necessary, we will process your personal data where it is in our legitimate interests to do so, or those of a third party. We only do this where we are satisfied that your privacy rights are protected satisfactorily. You have a right to object to any processing of your personal information based on this legal basis.
- **Consent:** When you actively consent to giving your personal data. You are able to remove your consent at any time. You can do this by contacting us on hello@urbanforesight.org Your rights under GDPR will be respected.
- **Legal Obligation:** Where we need to comply with a legal obligation.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note: we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or supplier.	(a)Identity (b)Contact details	(a)Performance of a contract with you (b)Contract

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To process payments and deliver services to you/ receive services from you, including:</p> <ul style="list-style-type: none"> (a) Manage payments, fees and charges. (b) Collect and recover money owed to us. (c) Pay money that is owed to you by us. 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
<p>To manage our relationship with you which may include:</p> <ul style="list-style-type: none"> (a) Notifying you about changes to our terms or privacy policy. (b) Sending relevant communications or updates. (c) To enable you to take part in a relevant project survey. (d) To enable you to participate in a relevant workshop. (e) To enable you to attend an online event (e.g. webinar). (f) To enable you to give us feedback or contact us. (g) Photography (h) Video (i) In-person events - conferences 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Marketing 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) (d) Seek your consent where required.
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (business operations, administration and IT services, network security, fraud prevention and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
<p>To deliver relevant website content and advertisements to you and measure or</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile 	<p>Legitimate Interest: Necessary for our legitimate interests (to study how</p>

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
understand the effectiveness of the advertising we serve to you	(d) Usage (e) Marketing (f) Technical	customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) Legitimate Interest: To study how customers use our products/services, develop them, to grow our business and to inform our marketing strategy.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or be of interest to you. This is how we decide which products, services may be relevant to you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have opted in to receive that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages by contacting us at any time. Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Change of purpose

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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

5. Disclosures of your personal data

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.

We may share your personal data with third parties with whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

6. International transfers

We share your personal data within Urban Foresight Limited. This may involve transferring your data outside the European Economic Area (EEA).

Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

We store your data primarily on secure cloud servers in the UK and EEA (European Economic Area). Although we make every effort to keep your data in the UK / EEA, we occasionally work with third party software in the United States.

In these cases, we ensure they will abide by the same level of assurances as the UK / EEA respectively through processes personal data outside the UK and provides protection through the relevant Model Contract Clauses.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the EU. For further information, see EU: Adequacy of the protection of personal data in non-EU countries.

- Where we use certain service providers, we may use specific contracts approved by the EU, which give personal data the same protection it has in Europe. For further details, see EU: Model contracts for the transfer of personal data to third countries (with UK GDPR provisions).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide a similar level of protection as the EU to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, 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 breaches and will notify you and any applicable regulator of a breach where we are legally required to do so.

All data will be processed in confidence by Urban Foresight in accordance with relevant UK data laws where applicable.

This includes:

- The collection, storage and dissemination of personal data and information will adhere to the UK General Data Protection Regulation's (GDPR) principles of lawfulness, fairness, and transparency.
- All elements of the business will adhere to the requirements of the UK Data Protection Act (2018).
- Your personal data will be obtained lawfully, will be obtained only as is appropriate (i.e., not excessive) for the project, will be used for the stated purpose, will be processed in accordance with the above laws, and will be captured, stored and communicated in a way that protects it against unauthorised or unlawful processing, accidental loss or destruction.

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

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider :

- The requirements of our business and the services provided.
- Any statutory or legal obligations.
- The purposes for which we originally collected the personal data.
- The lawful grounds on which we based our processing.
- The types of personal data we have collected.

- The amount and categories of your personal data.
- Whether the purpose of the processing could reasonably be fulfilled by other means and the applicable legal requirements.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Details of retention period for different aspects of your personal data, we consider the amount, nature, and sensitivity of the personal data are set out in the table in paragraph 4 above.

In some circumstances you can ask us to delete your data: see request erasure below for further information.

Sometimes we may need to anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Individuals' rights in connection with personal data

Under certain circumstances, by law you have the right to:

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:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- 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.

- 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.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

Contact Details:

Melanie Buchanan – Data Protection Officer (DPO)

e: hello@urbanforesight.org

t: +44 (0)191 814 2210

or in writing to:

Urban Foresight

3 Science Square

Newcastle upon Tyne

NE4 5TG

United Kingdom

e: hello@urbanforesight.org

t: +44 (0)191 814 2210

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

You can also complain to the ICO (Information Commissioners Office) 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

t: 0303 123 1113

w: [Information Commissioners Office](http://www.informationcommissionersoffice.co.uk)