



## PRIVACY POLICY

### 1. Introduction

1. We are committed to safeguarding the privacy of our clients, the information they provide to us, use of our website and service users. The information provided by us within this policy will explain how we will handle your personal data.

### 2. How we use your personal data

1. **Website Usage Data** – Meaning the way you use our website and the services provided on the website. This includes your IP address, geographical location, browser type and version, your operating system, where you were referred to our website from (i.e. Google Search), the length of time you spent visiting the website, the number of pages you viewed and the navigation path that you followed. As well as relevant information like timing, frequency of visits and the pattern of your use. The source of the usage data is Google Analytics. This usage data may be processed by us for the purpose of analysing the use of our website and services, the legal basis for the processing of the usage data is consent-based and for monitoring and improving our website and services
2. **Enquiry Data** – Information contained in any enquiry you submit or supply to us regarding our products and services. This includes your name, postal address and postcode, e-mail address and telephone contact number(s). Enquiry data may be processed for the purposes of offering, marketing and selling relevant products and or services to you. The legal basis for processing this information is consent and to ensure the proper administration of our business and the provision of services we provide you.
3. **Notification Data** – Information that you provide to us for the purpose of subscribing to our email notifications and newsletters. Notification data may be processed for the purposes of sending you relevant notifications and newsletters. The legal basis for processing this information is consent and to ensure the proper administration of our business and the provision of the services that we provide you
4. **Correspondence Data** – Information contained in or relating to any communication that you send to us. Correspondence data may include the communication content and the metadata associated with the communication. Our website will generate the metadata associated with the communication made using the website contact forms. Correspondence data may be processed for the purposes of communicating with you and for record-keeping. The legal basis for processing this information is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
5. **Hard communications data** – information about you supplied by you to us by letter, enquiry, hard copy email correspondence or other hard copy data stored securely in project files within our premises. The legal basis for storing and processing this information is consent and to ensure the proper administration of our business and the provision of services we provide you.
6. In addition to the specific purpose for which we may process your personal data set out in this Section 2, we may also process your personal data where such processing is necessary for the compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interest of another natural person.
7. Please do not supply any other person's personal data to us, unless we prompt you to do so.

### 3. Providing Your Personal Data to Others

1. We will not supply or make available your personal data to any other party without your prior consent.
2. We may disclose your personal data to our insurers or professional advisers insofar as is reasonably necessary for the purposes of obtaining and maintaining insurance coverage,

managing risks, obtaining professional advice and managing legal disputes.

#### 4. Retaining and Deleting Personal Data

1. This section sets out our data retention policy and procedures, which are designed to help ensure we comply with our legal obligations in relation to the retention and deletion of personal data.
2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
  1. Usage Data will be retained by us for the duration of your contract with us. Any formal request to remove this information will be dealt with efficiently and your data will be deleted / removed from our systems.
  2. Account Data will be retained by us for the duration of your contract with us, any formal request from you to remove this information will be dealt with efficiently and your data will be deleted / removed from our systems.
  3. Service Data will be retained by us for the duration of your contract with us, any formal request to remove this information will be dealt with efficiently and your data will be deleted / removed from our systems.
  4. Enquiry Data will be retained by us for the duration of the enquiry response process, if the enquiry does not result in the provision of a product or service to you or your company the data will be deleted from our system. If the enquiry results in the acceptance of a quote or provision of service for you or your company the enquiry data will be transferred to account data which we will hold for the duration of the contract.
  5. Correspondence Data will be kept for a period of 12 months when it will be deleted from our system

Notwithstanding the other provisions of this section 4 we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. Such retained information will normally be securely retained and stored on our systems for a period of up to 10 years following which it will be removed and destroyed.

#### 5. Amendments

1. We may update this policy from time to time by publishing a new version on our website.
2. You should check this page occasionally to ensure you are happy with any changes to the policy.
3. We may notify you of changes to this policy by email or through our social media channels.

#### 6. Your Rights

1. You may instruct us to provide you with any personal information we hold about you, the provision of such information will be subject to the supply of appropriate identification.
2. We may withhold personal information that you request to the extent permitted by law.
3. You may instruct us at any time not to process your personal information for marketing purposes.
4. You have the right to withdraw consent to data processing at any time.
5. You have the right to erasure of personal information data that we hold about you.
6. You may instruct us to correct any personal information we hold about you that is incorrect.

#### 7. Cookies

1. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. They can be persistent (remain valid until a set expiry date) or session (expiring when the browser is closed). Cookies do not typically contain any information that personally identifies a user, but personal information we store about you may be linked to the information stored by and obtained from cookies.
2. We use cookies for authentication, security, advertising and analysis as well as your consent to the use of cookies more generally, the cookies used for these purposes are known as identify cookies.

3. Our service providers may use cookies and those cookies may be stored on your computer when you visit our website.
4. We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

#### 8. Our Details

1. This privacy policy applies to electronic and hard copy data and information supplied by you to us.
2. The UPSTAIRS website is owned and operated by: HRI|Munro architecture
3. You can contact us here: <http://www.hri-architects.com/contact.php>  
Or by e-mail to: [admin@hri-architects.com](mailto:admin@hri-architects.com) or [jayne@upstairs.scot](mailto:jayne@upstairs.scot)
4. This Privacy Policy has been adapted from the free policy provided by SEQ Legal which you can find a copy of here (<http://www.seqlegal.com>).