



Centre for  
**Strategy & Evaluation  
Services**

# Our data protection, privacy and cookie policy

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The Centre for Strategy & Evaluation Services LLP  
(CSES)

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## **1. CSES' data protection, privacy and cookie policy**

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### **1.1 INTRODUCTION**

This document sets out CSES' data protection, privacy and cookie policy. CSES respects the privacy of our website users and are determined to protect your personal data. The purpose of this privacy notice is to inform our website users as to how we look after their personal data when visiting our website. Our privacy notice and procedures for ensuring high levels of data protection are fully compliant with the General Data Protection Regulation (GDPR).

### **1.2 WHO WE ARE AND IMPORTANT INFORMATION**

The Centre for Strategy & Evaluation Services LLP (hereafter "CSES") is a public policy consultancy which offers multidisciplinary research and consultancy services.

#### **1.2.1 What is the purpose of this privacy notice?**

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website. Website users undertake to read this privacy notice together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal data about users, so that you are fully aware as to how, and why we are using your data.

#### **1.2.2 Data controller**

CSES is the controller responsible for your personal data. Our contact details are Westering House, 17 Coombe Road, Otford, TN14 5RJ United Kingdom, Tel/Fax: +44 01959 525122. For all data matters contact Jan Smit, the Data Protection Officer on [jsmit@cses.co.uk](mailto:jsmit@cses.co.uk).]

#### **1.2.3 Third-party links outside of our control**

This website includes links to third-party websites of our partner organisations. 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 notice of every website you visit.

### **1.3 THE PERSONAL DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

The only data gathered about our website users is generated automatically by an analytics tool provided by our website provider, Squarespace. When someone visits [www.cses.co.uk](http://www.cses.co.uk), to collect standard internet log information and details of visitor behaviour patterns. We do this to find out the number of visitors to the various parts of our website. The data gathered includes: the IP address and location (if available) of the user, their web domain (if a corporate or public sector organisation) and which page within the CSES website that they have visited. Other than the IP address, the data is anonymous and no personal data relating to the individual in question is gathered.

This data is only used for internal analytical purposes and key metrics are presented in aggregate.

Data are only processed in a way which does not identify individual persons. We do not make, and do not allow Squarespace or other analytical tools such as Google Analytics to make any attempt to find out the identities of those visiting our website.

Aggregated data may be derived from data about individual users' IP addresses. However, this is not considered to be personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your data usage to calculate the percentage of users accessing a specific website feature.

We do not collect any **Personal Data** about users.

## 1.4 HOW WE COLLECT YOUR PERSONAL DATA

The only personal data we collect about you through our website is through the website tracking and analysis method set out in (2) above.

Any other data we hold about you will be collected directly. You may for instance provide us with your contact details and personal data by completing an online survey, taking part in an interview programme or by corresponding with us by post, phone or email.

## 1.5 HOW WE USE YOUR PERSONAL DATA

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

- **Performance of a Contract** - this means processing your data where it is necessary for the performance of a contract, for example, analysing online survey data or interview feedback.
- **Legitimate Interest** - this means the interest of our business in conducting and managing our business to enable us to give you the best service and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Personal data is generally deleted once a study has been completed, unless there is a specific and legitimate interest in retaining such data. In all cases, should a legitimate interest be identified, the express consent of those having provided personal data will be sought and the personal data of anyone not explicitly providing consent will be promptly deleted.
- **Comply with a legal or regulatory obligation** - this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we CSES is subject to.

## 1.6 PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

### 1.6.1 The use of personal data - overview

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that 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 ([jsmit@cses.co.uk](mailto:jsmit@cses.co.uk)) 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.

**Table 1.1- Legal basis for data processing and type of data**

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To obtain opinion-based stakeholder feedback through online surveys and interviews	(a) Identity (b) Contact	Performance of a services contract Note: Post-study completion, personal identifier information is generally deleted, unless there is a specific legitimate reason for retaining contact data. If such a legitimate interest is identified, then the express email consent of those having completed a survey or taken part in an interview is requested. If no response is received, any personal data will be deleted.
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To register you as a supplier	(a) Identity (b) Contact (c) Financial details	Performance of a contract with you
Web analytics	IP details (and country/ location of IP address)	Legitimate interest

More detailed arrangements for ensuring high levels of data protection and privacy and setting out how we process the personal data of our partner organisations, business associates, subcontractors and clients is included in specific clauses within relevant documents setting out contractual relations. These are not applicable to either general website users or to those taking part in surveys or interview programmes, but will be provided to relevant parties at the appropriate time.

### 1.6.2 Cookies and Cookie Policy

In order to collect certain basic information useful for analytical purposes on our users, Squarespace, our website provider, collects basic data on website users using cookies. As explained earlier in our data privacy policy, the only data collected is the IP address and location of the IP rather than data about individual users. This information is analysed in aggregate only, and only for legitimate internal purposes. It is not shared with any third party.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### 1.6.3 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 and lawful. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [jsmit@cses.co.uk](mailto:jsmit@cses.co.uk).

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 1.7 WHO WE SHARE YOUR PERSONAL DATA WITH

We may have to share your personal data with the parties set out below for the purposes set out in the table in Section 1.6 above.

- External Third Parties - Service Providers
  - Our email provider, Speednames, based in the UK
  - Our internet site provider, Squarespace, based in the US which provides IT and system administration services.

### 1.7.1 Other External Third Parties – partner organisations

CSES works closely with selected service providers in jointly delivering some services contracts. In such instances, the letter of introduction about the study makes clear who we are working with on the particular study assignment. Some data may be shared with third party partners we are working with for the purposes of data analysis. All third parties must sign up to CSES' policy on data protection and privacy and follow the same procedures as CSES, such as deleting any personal data and information once a study assignment has been completed.

We require all third parties to respect the security of your personal data and to treat it in accordance with the regulatory requirements set out in the GDPR. 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.

### 1.7.2 International Transfers

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

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by implementing safeguards. Our main external suppliers are Drop Box and Survey Monkey.

Please contact us [jsmit@cses.co.uk](mailto:jsmit@cses.co.uk) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

### 1.7.3 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 are involved in jointly delivering an assignment with us and therefore have a business need to know. They will only process your personal data on our instructions and will be subject to a contractually-binding duty of confidentiality.

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

### 1.7.4 Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, typically for analysis and reporting requirements during a study/ piece of research. Data may also need to be retained for the purposes of satisfying any legal, accounting, or auditing requirements.

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 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.

In some circumstances you can ask us to delete your data: see the next section on **“Your legal rights”** below for further information. In some circumstances, we may retain information you have provided (for instance, in a survey or during an interview) but fully anonymise the survey or interview response for research or statistical purposes, so that no personal data can be identified associated with you, in which case we may use this information indefinitely without further notice to you.

## **1.8 YOUR LEGAL RIGHTS**

Unless subject to an exemption under the relevant data protection laws, under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact [jsmit@cses.co.uk](mailto:jsmit@cses.co.uk)

### **1.8.1 No fee required – with some exceptions**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **1.8.2 What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **1.8.3 Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or if you have made a number of requests. In this case, we will notify you and keep you updated.

## **1.9 Changes to this notice and your duty to inform us of changes**

This version was published on 25 May 2018. This version will be available when further updates are made, and earlier versions will be made available on request by contacting us. Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

### **1.10 Queries, requests or concerns**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Protection Officer [jsmit@cses.co.uk](mailto:jsmit@cses.co.uk).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.