

# Privacy Statement

**This Privacy Statement covers the way in which Plymouth City Council's Highways Department will use and disclose personal information that has been provided to us from South West Highways or other third parties.**

Personal information includes any information that identifies an individual personally, such as a name, address, email address, internet protocol address or telephone number.

Under the General Data Protection Regulation (EU) 2016/679 (GDPR), Plymouth City Council's Highways Department, is defined as the Data Controller and therefore has a legal duty to protect any personal information collected. We use appropriate technologies to safeguard personal details and keep to strict security standards to prevent unauthorised access.

We recognise that an individual's privacy is very important and so we want to provide confidence in the way we handle personal information. We have outlined below how we collect, use, disclose, and protect this information.

## How We Collect Information

Plymouth City Council's Highways Department receives and stores personal information supplied to us in writing, via email, via the telephone or via the internet. We may also receive personal information from third parties, for example, the police.

## How We Use Information

We may use the information collected in any of the following ways:

- We principally collect personal information so that we can better deliver the highway maintenance service for the people of Plymouth.
- We may use personal information such as an address, email address and telephone/mobile phone number to communicate with members of the public, for example to provide information relating to planned work or current highway maintenance activities or new developments or for customer satisfaction queries.
- Comments towards Traffic Regulation Orders will be used to create a briefing report in order to decide if the Order should remain as advertised, be modified or abandoned.
- Contact details, may be used for security reasons to verify an individual's identity.
- We may also use personal information for insurance claims, internal administration, analyses and operational/service reviews.

## Legal basis for Processing

The legal basis we use to process personal data may differ for each processing activity.

- The personal information that we collect via Firmstep is processed with an individual's explicit consent.
- If we need to share an individual's personal information with other agencies to provide services, we shall always gain the individual's consent before sharing their personal data with this third-party.
- Some information such as locations, vehicle registration numbers, etc. captured in highway maintenance images may be processed under Legitimate Interest.
- All electronic customer service communications will require your consent.

## How long we keep your data for

We keep your personal information in line with our data retention policy. In certain circumstances we have a statutory obligation to keep personal information for a set period of time for financial auditing purposes.

## Disclosure of Information

Plymouth City Council's Highways Department may share personal information, as necessary, with our service providers, agents or other relevant third parties so that we can provide the services that individuals have asked for, or to carry out any other service delivery obligations.

We may also disclose personal information to other employees or South West Highways, including subcontractors, in the course of providing highway services.

We do not permit these parties to use such information for any other purpose than to perform the services they have been instructed to provide by us.

We may also need to disclose any personal information collected if required to do so by law.

## International Transfers

Ordinarily we do not transfer your personal data outside the EEA. If we do make such a transfer, we will, if appropriate, put a contract in place to ensure that the information is protected.

## Storage and Security of Personal Information

Plymouth City Council's Highways Department will use all reasonable means to ensure that personal information is stored in a secure and confidential environment and when the information is no longer needed it will be destroyed.



## **Our Commitment to Data Security**

To prevent unauthorised access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, organisational and managerial procedures to safeguard and secure the information we collect.

## **Control of Personal Information**

We do not use personal information for direct marketing purposes.

**Right of Access to personal information:** if an individual requires access to the personal data we hold about you then please write to us or email us at the addresses below or call us on the number below.

**Right to Rectify your information:** If you believe that the information we hold about you is incorrect then please write to us or email us at the addresses below or call us on the number below.

**Right to Erase your information:** If you do not want Plymouth City Council's Highways Department to hold your personal data any longer then please write to us or email us at the addresses below or call us on the number below.

**Right to Restriction of Processing:** If you believe that your personal data is inaccurate, or that the Charity is processing your personal data unlawfully and you do not want your personal data erased and you wish to restrict the processing of your personal data, then please write to us or email us at the addresses below or call us on the number below.

**Right to Object:** If you believe that there are no legitimate grounds for processing your data or that you no longer wish to receive marketing communications, then please write to us or email us at the addresses below or call us on the number below.

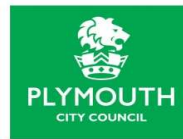
## **Complaints**

If you wish to complain to Plymouth City Council's Highways Department then please write to us or email us at the addresses below or call us on the number below.

**Plymouth Highways  
Prince Rock Depot  
Plymouth  
PL4 0RZ**

**01752 668000**

**[Plymouth.highways@plymouth.gov.uk](mailto:Plymouth.highways@plymouth.gov.uk)**



If you are still not satisfied with the way your complaint was handled, you can refer your complaint to UK Information Commissioner's Office. <https://ico.org.uk/concerns/>

## Data Controller

Plymouth City Council is registered as a data controller with the Information Commissioner's Office (registration number: Z7262171).

Contact details for the council's data controller are:

Data Protection Officer, Plymouth City Council, Ballard House, West Hoe Road, Plymouth PL1 3BJ.

Email: [dataprotectionofficer@plymouth.gov.uk](mailto:dataprotectionofficer@plymouth.gov.uk)

## Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 02/07/2018