

Cascade Communications Limited

Privacy Policy

1. Introduction

- 1.1. This Privacy Policy details how we, Cascade Communications Limited of 3 & 4 Wardour Mews, London, W1F 8AJ, collect, use and process personal data. If you have any questions on this Privacy Policy or otherwise relating to how we process your personal data you can contact us at info@cascadecommunications.co.uk or on 020 7871 3565.
- 1.2. This Privacy Policy affects your legal rights and obligations so please read it carefully. If you do not agree to be bound by this Privacy Policy, please do not provide your personal data to us or request that your employer does not do so.
- 1.3. We may update this Privacy Policy from time to time at our discretion and in particular to reflect any changes in applicable laws. If we do so, and the changes substantially affect your rights or obligations, we shall notify you if we have your email address. Otherwise, you are responsible for regularly reviewing this Privacy Policy so that you are aware of any changes to it.

2. Whose personal data do we collect?

- 2.1. We collect data relating to a number of individuals. Whilst providing consultancy services, we inevitably collect personal data of employees of our clients, suppliers and subcontractors. We also collect personal data of employees of potential clients, suppliers and subcontractors. As part of our obligations to our clients, we also collect personal data of individuals, such as residents who may be affected by a particular planning development or other issue.
- 2.2. We are the data controller of the personal data provided to us by our clients, suppliers and subcontractors. However, if we have received your personal data as a result of providing services to our clients, we are the data processor of your personal data; our client is the data controller. This means that we only process your personal data in accordance with the instructions of our client.
- 2.3. We will only collect the personal data that you provide to us, or that is provided by your employer, or our client, as the case may be. We only collect such personal data as is necessary for our purposes and you do not have to provide any personal data to us. Accordingly, we do not expect to collect any data other than the following personal data name, email address, geographical address and telephone number.
- 2.4. We ask that all personal data that you provide to us is true, complete and accurate.
- 2.5. When you contact us by email or post, we may keep a record of the correspondence and we may also record any telephone call we have with you.

3. Lawful use of your personal data

- 3.1. We will only use your personal data where we have a lawful basis to do so. The lawful purposes that we rely on under this Privacy Policy are:
 - consent (where you choose to provide it);
 - performance of our contract with you;
 - compliance with legal requirements; and

- legitimate interests. When we refer to legitimate interests, we mean our legitimate business interests in the normal running of our business which do not materially impact your rights, freedom or interests.
- 3.2. How we use your personal data depends on why we have collected it. If we have received your personal data because you are employed by a client, supplier or subcontractor, we will process your personal data to perform any contract we have entered into with your employer or in relation to any steps we take at the request of your employer prior to entering into a contract.
- 3.3. If we have collected your personal data as a result of any project we are working on for a client, we shall process that personal data only as instructed by our client subject to your rights under paragraph 8 of the *Your rights* section below in this Privacy Policy. Our client's privacy notice shall apply to the processing of your personal data. You will be directed to the client's privacy policy when your information is collected, or they will at least be identified as the client on whose behalf we are working and their privacy notice can be located on their website. You agree that if you have completed a form requesting to be kept up to date with a particular project on behalf of our client, then you have consented to be contacted in that way. As part of our client's legitimate interests, we may also contact you on behalf of our client in relation to our client's project. However, you can always ask us /our client to stop contacting you in this way; again see paragraph 8 of the *Your rights* section below in this Privacy Policy.
- 3.4. We may from time to time need to use your personal data to comply with any legal obligations, demands or requirements, for example, as part of anti-money laundering processes or to protect a third party's rights, property, or safety.
- 3.5. We may also use your personal data for our legitimate interests, including:
- to improve our website and services;
 - in connection with, or during negotiations of, any merger, sale of assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company;
 - to deal with any questions or comments you raise;
 - for audit purposes; and
 - to contact you about changes to this Privacy Policy as set out above.

4. Marketing

- 4.1. For our legitimate business interests, we may send marketing email messages to you about our services. You can choose to no longer receive marketing emails from us by contacting us or clicking unsubscribe from a marketing email. Please note that it may take us a few days to update our records to reflect your request.
- 4.2. If you ask us to remove you from our marketing list, we shall keep a record of your name and email address to ensure that we do not send to you marketing information. If you still have an ongoing relationship with us, we shall continue to email you in relation to that relationship only.

5. Who do we share your data with?

- 5.1. If we have collected your personal data as a result of any project we are working on for a client, we may share your personal data with our client as the data controller.

- 5.2. For our legitimate interests, we may share your personal data with any service providers, sub-contractors and agents that we may appoint to perform functions on our behalf and in accordance with our instructions, including payment providers, IT service providers, accountants, auditors and lawyers. We shall provide our service providers, sub-contractors and agents only with such of your personal data as they need to provide the service for us and if we stop using their services, we shall request that they delete your personal data or make it anonymous within their systems.
- 5.3. In order to comply with our legal obligations, under certain circumstances we may have to disclose your personal data under applicable laws and/or regulations, for example, as part of anti-money laundering processes or to protect a third party's rights, property, or safety.
- 5.4. For our legitimate interests, we may also share your personal data in connection with, or during negotiations of, any merger, sale of assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

6. Where we hold and process your personal data

- 6.1. Some or all of your personal data may be stored or transferred outside of the United Kingdom for any reason, including for example, if our email server is located in a country outside the United Kingdom or if any of our service providers are based outside of the United Kingdom.
- 6.2. If we do store or transfer your personal data outside the United Kingdom, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the United Kingdom and under applicable laws.

7. Security

- 7.1. We shall process your personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. We do this by using appropriate technical or organisational measures, for example, all information you provide to us is stored on our secure servers and our employees are required to comply with all applicable data protection laws.
- 7.2. Notwithstanding paragraph 7.1 above, you acknowledge that no system can be completely secure. Therefore, although we take these steps to secure your personal data, we do not promise that your personal data will always remain completely secure.

8. Your rights and retention of personal data

- 8.1. You have a number of rights under applicable data protection legislation. Some of these rights are complex, and not all of the details have been included below. Further information can be found [here](#).
 - Right of access: You have the right to obtain from us a copy of the personal data that we hold for you.
 - Right to rectification: You can require us to correct errors in the personal data that we process for you if it is inaccurate, incomplete or out of date.
 - Right to portability: You can request that we transfer your personal data to another service provider.
 - Right to restriction of processing: In certain circumstances, you have the right to require that we restrict the processing of your personal information.

- Right to be forgotten: You also have the right at any time to require that we delete the personal data that we hold for you, where it is no longer necessary for us to hold it. However, whilst we respect your right to be forgotten, we may still retain your personal data in accordance with applicable laws.
- Right to stop receiving marketing information: You can ask us to stop sending you information about our services.

8.2. We reserve the right to charge an administrative fee if your request in relation to your rights is manifestly unfounded or excessive.

8.3. To exercise these rights, or any other rights you may have under applicable laws, please contact us at info@cascadecommunications.co.uk or on 020 7871 3565. It may take us a few days to process your request, in particular to remove you from our communications database, but we shall do our best to act promptly. Any requests to exercise your rights in relation to personal data that is controlled by our clients, should be sent directly to them using the contact details provided in the relevant client's privacy policy.

8.4. You may also contact the Information Commissioner, see www.ico.org.uk or if you are based outside of the United Kingdom, please contact your local regulatory authority.

9. Retention of personal data

9.1. Subject to the provisions of this Privacy Policy, we will retain personal data in accordance with applicable laws.

9.2. If we have received your personal data because you are an employee of a client, supplier or subcontractor, we shall retain your personal data until we no longer work with your employer, except where we are required to retain your personal data for longer to comply with accounting, audit and taxation requirements. If you have requested to receive updates from us about a particular planning development or issue, we shall retain your personal data until you opt out of receiving such communications, or in our view, until the development or other issue is completed or if earlier, if we cease to work with the client in question. However, we may also be required to retain personal data for a particular period of time to comply with legal, auditory or statutory requirements, including requirements of HMRC in respect of financial documents.

9.3. Where we have no legal basis for continuing to process your personal data, we shall either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

10. General

10.1. If any we have no legal basis for continuing to process your personal data, we shall either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

10.2. This Privacy Policy shall be governed by and construed in accordance with the law of England and Wales, and you agree to submit to the exclusive jurisdiction of the English Courts.

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