Context Office LLP is registered in England and Wales reg. no. 0C434309 Registered address - International House 101 King's Cross Road London WC1X 9LP Contact address - mail@contextoffice.co.uk

This privacy policy statement describes how we (Context Office) collect, use and store information and how this information is shared. The topics in this statement cover:

- 1. Information we hold and why we collect it
- 2. How we collect and process data
- 3. Using and retaining personal information
- 4. How we protect your data
- 5. Sharing your personal data
- 6. Your rights in relation to personal information
- 7. Contacting us and the appropriate authorities
- 8. Changes to this privacy policy

1. Information we hold and why we collect it

Contact details - we collect your business or personal contact details and information when you contact us, request information about Context Office, our business, services or activities. This information may be collected through direct contact (via email, telephone, in person or via social media), through a procurement process, attendance at a Context Office led event or through a publicly available resource such as a website or public social media profile.

Further business information — we may collect and process further information voluntarily provided to us or publicly available that is necessary for the progression of a client or project contractual relationship with Context Office. For example job title, business bank details or company department.

Supplier information — we may collect and process data that is voluntarily provided to us and necessary for the progression of business activities, whether company, partnership or individual payment data, for the furthering of a client or project contractual relationship with Context Office. This data may include information necessary for due diligence procedures, processing payments and other related billing information.

Staff information — we may collect data such as name, previous job title, postal address, including your home address, where you have provided this to us, business address, telephone number, mobile phone number, fax number and email address, as well as bank details. This information is collected in order to establish the necessary professional contracts and contacts for staff, employees and sub-consultants.

Website data — we may collect data of website visitors through website analytics tracking systems, IP addresses & server logs, length of visit to pages on our website, number of visits, page views, navigation paths and time zone setting. This data is used to monitor the volume of traffic our website receives and popular content viewed. Our legitimate interest for the use of this data is that it enables us to understand the effectiveness of our website and other communications activities and to support relevant business decision-making. Cookies are text files sent from our website to your web browser when you visit our website. 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 cookies please visit allaboutcookies.org

Social Media — we may collect data from public social media sites, such as the names and contact information of followers of Context Office on Instagram. Our legitimate interest for the use of this data is that it enables us to understand the effectiveness of our communications activities and support relevant business decision-making.

Third party data - we may collect data from publicly available sources such as Companies House and the Electoral Register that is necessary in order to progress project work, or for the progression of a client or contractual relationship with Context Office.

Project specific data - information about people may be collected in the course of our research for projects. For example this could be through interviews, community engagement, workshops with clients and stakeholders, through photography or analysis of the use of spaces by people. In many cases this will be anonymised information. In some cases this may be personal data that is legitimately collected as part of the project work.

### 2. How we collect and process data

Contact details - we securely retain the contact details of individuals we correspond with through the course of our business activities, as stated in all emails from Context Office. If you wish your contact details to be deleted, to opt out of contact retention, please inform <a href="mail@contextoffice.co.uk">mail@contextoffice.co.uk</a>.

Project specific personal information - if we collect personal data as part of our project work, for example in a workshop with members of the public, a Privacy Note will be presented at the point of data collection, to ensure that data subjects are aware of the lawful basis for the collection and processing of the data, who the data will be shared with (where applicable), and their rights concerning the data being collected. Data subjects are required to confirm that they consent to their personal data being used for the purpose that has been stated. Copies of the paperwork relating to this active informed consent are stored securely within the relevant project folder on our server, and are available for audit if required. Where relevant we will also provide the option to opt-in to be kept up-to-date with meetings and progress on the project, as well as any related events in the future.

Young people - the GDPR sets the age when a child can give their own consent to data processing at sixteen. We will never collect personal data from children under the age of sixteen unless consent has been provided from a person holding parental responsibility.

Photography - Context Office undertake site research, record the conditions and use of the public realm as part of our work. We create photographs in accordance with UK law, GDPR, and in line with our privacy policy and staff guidance.

### 3. Using and retaining personal information

We will only use information that we collect about you lawfully in accordance with GDPR. We collect and process personal data in order to provide our professional services, for business administration and marketing.

We will only collect, keep hold of, or process personal data supplied to us in order to:

- Deal with enquiries and requests
- Provide you with information and news about Context Office
- Complete business correspondence and transactions
- Complete project work, or archive project work for future reference

We may contact you to provide information that we believe we have a legitimate interest in communicating, including business updates relevant to on-going client relationship and invitations to Context Office and other business sector events. We may also use your personal data contact information to communicate with you via email other updates and information on Context Office events, projects, and services. Our legitimate interest is the continuation of networking and information sharing with existing business contacts.

How personal data is processed can vary from project to project. If we collect data as part of a project this will be clearly specified within the Privacy Note at the point of data collection. Records of personal data processing activities are recorded in the relevant secure project folder on our server.

### 4. How we protect your data

Context office will comply with Article 32 of the GDPR, which refers to the security of processing of personal data. The level of security of data storage is assessed on a project-by-project basis and is appropriate to the risks presented by processing the data including the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or

access to personal data transmitted, stored or otherwise processed. All data held by Context Office is stored securely and electronically on our company server, which is password-protected as well as being backed up regularly to reduce the risk of data loss and ensure the timely restoration of access to the data in the event of a technical incident.

Contact information that we may use for marketing purposes (to keep individuals or organisations informed about projects we are working on or to invite them to events we are hosting) will be kept securely on our server until such time as we are notified that they no longer wish us to retain this information.

Data will be reviewed to assess if it still required in order to fulfil the purpose of its original collection, including consideration of its nature and sensitivity, processing requirements, the potential risk of unauthorised use or disclosure and any relevant legal, accounting, or reporting requirements. If your personal data is no longer reasonably required for the purpose for which it was collected, or if you have withdrawn your consent and we are not legally required or otherwise permitted to continue storing such data, it will be deleted.

Data that has been collated and made anonymous for research or statistical purposes may be used indefinitely without further notice.

#### 5. Sharing your personal data

In the course of our work we may share your personal data with the following organisations for necessary business purposes:

- Service providers who provide IT and system administration services, such as the processing of payroll
- Professional advisers including lawyers, bankers, auditors and insurers who require it for regulatory reasons.
- Government bodies that require us to report processing activities.

We only transfer personal data to third parties for specified purposes. All third parties to whom we transfer your data are required to respect the security of your personal data and to treat it in accordance with the law.

If personal data is provided to Context Office by a third party, we request that the third party ensures that it is fully entitled to disclose that personal information to us and that the data may be processed by us in line with this Privacy Policy and the individuals' knowledge and understanding of all terms within it.

Personal information collected as project specific data will only ever be shared with organisations specified in the Privacy Note presented at the point of data collection, for example the client or local authority for whom we are processing the data. Personal data will never be passed onto any third party or used in any other way outside of that which has been specified. Findings resulting from the data we have processed will only be shared publicly in aggregate with specific data points anonymised.

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6. Your rights in relation to personal information

Your rights in relation to the personal data we hold about you are as follows:

- Right to be informed about data being collected and provided with privacy information or privacy note about its use, retention and with whom it will be shared, at the time that the data is collected.
- Right to access information about the personal data we hold about you.
- Right to rectify any incorrect personal data, including ensuring its completeness.
- Right to erasure of any personal data, provided it is not being used for an on-going legitimate interest or there is a relevant legal or regulatory requirement for its retention.
- Right to restrict the processing of personal data if it is incorrect or unlawful, if there is no legitimate interest or if is no longer required by Context Office.
- Right to portability allowing you to obtain and reuse your personal data for your own purposes.
- Right to object that processing is based on legitimate interest, including right to object to profiling analysis made for direct marketing purposes
- Right to complain. Context Office has procedures in place to ensure that we process your personal data in an open, accurate and legal manner, that we can comply with any requests without undue delay and that our staff have been trained in these procedures.

Data subjects can request access to their personal information, request for inaccurate data to be corrected or updated, or request that the data is deleted. If consent has been given for information to be retained for marketing purposes or in order for an individual to be kept up-to-date with meetings and progress on a particular project, consent may be withdrawn at any time. Data access or erasure requests, or any queries relating our privacy practices, can be made by contacting <a href="mail@contextoffice.co.uk">mail@contextoffice.co.uk</a>.

7. Contacting us and the appropriate authorities

Any queries regarding the information we hold or our privacy practices can be made by contacting us at <a href="mail@contextoffice.co.uk">mail@contextoffice.co.uk</a>.

If you wish to raise a complaint on how we have handled your personal data, you can contact us and we will investigate the matter. If you are not satisfied with our response or believe we are processing your personal data in a manner that is not in accordance with the law, you can complain to the Information Commissioner's Office (ICO) at <a href="https://ico.org.uk">https://ico.org.uk</a>.

8. Changes to this privacy policy

We may need to update our Privacy Policy from time to time, in line with evolving data processing and legal requirements. The latest version of the Privacy Policy will always be available via website and we will communicate any significant changes to the relevant parties.

This Privacy Policy was last updated in July 2023.