

Privacy and Data Protection Policy

1 Introduction

This is the privacy notice of Sensor City Liverpool Limited. In this document, "we", "our", or "us" refer to Sensor City Liverpool Limited.

We are company number 09278198 registered in the UK.

Our registered office is at 31 Russell Street, Liverpool, L3 5LJ

The GDPR applies to 'data controllers' and 'data processors'. A 'data controller' determines the purposes and means of processing personal data. A 'data processor' is responsible for processing personal data on behalf of a controller. Sensor City is a data controller.

This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.

We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you regarding the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected about you.

We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.

2 Sensor City's Data Protection Principles

Sensor City has adopted 8 core principles as the basis for data management and protection.

Principle 1:	Data held by Sensor City shall be processed fairly and lawfully.
Principle 2:	Data held by Sensor City shall be obtained and processed for lawful purposes only.
Principle 3:	Data held and process by Sensor City shall be adequate, relevant and not excessive.
Principle 4:	Personal data held by Sensor City has be accurate and – as far as reasonably possible – kept up to date.
Principle 5:	Personal data should not be kept for any longer than necessary for the purposes for which it was obtained.
Principle 6:	Personal data shall be processed in accordance with the requirement of GDPR.
Principle 7:	Sensor City will implement appropriate and proportionate measures against unauthorised access or unlawful processing of personal data.
Principle 8:	Personal data held by Sensor City shall not be transferred to a country or territory outside of the European Economic Area unless that Country ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

3 The legal basis on which we process information about you

The law requires us to determine the legal basis on which we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then - if required by law - we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

1.1. Information we process because we have a contractual obligation with you

When you buy a product or service from us or otherwise agree to our terms and conditions (e.g. engineering design services, office tenancies, hot desk licences, guest wifi or room hire) a contract is formed between you and us. However, our payments, invoicing and general contract administration is usually undertaken by the University of Liverpool or Liverpool John Moores University (the owners of Sensor City).

In order to carry out our obligations under that contract we must process the information you give us and share it with the University of Liverpool or Liverpool John Moores University if they are the contract administrator. In such instances, any data supplied to either University would be subject to the Privacy Policies of the University of Liverpool or Liverpool John Moores University respectively. Some of this information may be personal information. Further details of the University's Privacy Policies can be found at:

- https://www.liverpool.ac.uk/legal/data_protection/policy/
- <https://www.ljmu.ac.uk/about-us/data-protection>

We may use it to:

- Verify your identity for security purposes;
- Sell products to you or provide you with our services; and
- Provide you with suggestions and advice on our products and services.

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

1.2. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business - including job opportunities, events and our products and services - you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to receive Sensor City newsletters.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide advice, services or products you would find useful, for example, professional services and business advice provided by Sensor City associates or members.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at info@sensorcity.co.uk. However, if you do so, you may not be able to use our website or our services further.

1.3. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- Whether the same objective could be achieved through other means;
- Whether processing (or not processing) might cause you harm; and,
- Whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

- Record-keeping for the proper and necessary administration of our business;
- Responding to unsolicited communication from you to which we believe you would expect a response;
- Protecting and asserting the legal rights of any party;
- Insuring against or obtaining professional advice that is required to manage organisational or business risk; and,
- Protecting your interests where we believe we have a duty to do so.

1.4. Information we process because we have a legal obligation

We are subject to the law like everyone else. Sometimes, we must process your information to comply with a statutory obligation. This may include your personal information. For example:

- We are required to retain data relating to ERDF funded projects or State Aid records until 2033; and,
- We may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

4 Data Management at Sensor City

All personal data held by Sensor City is managed through our Data Management Protocol. This includes information on our systems for:

- Recording the legal basis for data held at Sensor City;
- Recording dates when permission to use personal data was granted by an individual;
- Dealing with requests for personal data access, rectification, restriction and erasure; and,
- Complaints procedures.

5 Specific uses of information you provide to us

Our web site allows you to post information/enquiries via our online 'enquiry' form with a view to that information being read, copied, downloaded, or used by us in order to deal with your query. Our social media outlets – particularly Facebook, Twitter and LinkedIn- allow you to post information with a view to that information being read, shared, copied, downloaded, or used by other people. Examples include:

- Posting a message or comment;
- Tagging an image; and,
- Clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks.

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared. We do not store it, but we reserve a right to use it in any way we decide e.g. re-tweets.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information. You can make a request by contacting us at info@sensorcity.co.uk.

6 Complaints regarding content on our website

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

7 Information relating to your method of payment

Payment information is never taken by us or transferred to us either through our website or otherwise.

Payments are made to Sensor City via BACS/CHAPS, Bank Transfer, Cheque or Direct Debit (via GoCardless) and are therefore subject to the respective bank / payment company's privacy policies.

8 Information about your direct debit

When you agree to set up a direct debit arrangement, the information is provided by you directly to GoCardless for processing. The GoCardless web page may be branded to look like a page on our website, but it is not controlled by us. We do not have access to your banking information.

GoCardless are registered under the direct debit guarantee scheme. This provides for the customer's bank to refund disputed payments without question, pending further investigation.

9 Credit reference

To assist in combating fraud, we share information with credit reference agencies.

10 Information relating to job application and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

All Sensor City staff are employed by one of the third parties listed below. Legally required personal and sensitive payroll or related employment data for all Sensor City staff is managed and processed by one of the following organisations and is therefore managed under their specific data management protocols:

- Liverpool John Moores University;
- University of Liverpool;
- Employment Agencies; and,
- Kier Facilities Management.

If you are employed or seconded to work at Sensor City, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for a maximum of six years before destroying or deleting it.

11 Sending a message to our business support team

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our organisation.

We keep personally identifiable information associated with your message, such as your name and email address to enable us to track our communications with you to provide a high-quality service.

12 Complaining

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

13 Use of information we collect through automated systems when you visit our website

1.5. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved. Some cookies may last for a defined time period, such as one day or until you close your browser, whereas others last indefinitely. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses Google Analytics cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use. Any data collected via the use of this software is subject to the privacy policy of Google Analytics which can be viewed at

<https://support.google.com/analytics/answer/6004245>

1.6. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

Using AWStats software, we record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

14 Disclosure and sharing of your information

1.7. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

1.8. Third party advertising on our website

Third parties do not advertise on our website.

1.9. Data may be processed outside the European Union

Our website is hosted in the United Kingdom.

It is possible that we may also use services or software from countries outside the European Union from time to time, specifically Google services such as Google Analytics, Google Fonts, Google ReCaptcha and Google Maps. Accordingly, this means that data obtained via our website could be processed outside the European Union, but no information generated via Google services used on our web site would be personally identifiable to you.

15 Access to your own information

1.10. Access to your personal information

- At any time, you may review or update personally identifiable information that we hold about you;
- To obtain a copy of any information that is not provided on our website you may send us a request at info@sensorcity.co.uk; and,
- After receiving the request, and providing it is not manifestly unfounded or excessive, we will provide you with the information free of charge. We reserve the right to refuse or charge for information requests that are either manifestly unfounded or excessive and under such circumstances we will explain why we have taken this position regarding your request.

1.11. Removal of your information

If you wish us to remove personally identifiable information from our website, you may contact us at info@sensorcity.co.uk

This may limit the service we can provide to you.

1.12. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

16 Other matters

1.13. Minors

We do not market or sell products/services to minors via our website.

We collect data from our website and enquiries mechanisms regardless of age, and we anticipate that this may include data on minors. Therefore, if you are under 18, you may:

- Use our website or contact Sensor City if you have consent from a parent or guardian; and,
- Visit Sensor City through an event or activity organised through your school or other approved organisation.

Sensor City occasionally works with minors on specific projects. Under such circumstances we may be required to collect personal data on participants (such as name, age, postcode, school etc) required by certain funding bodies to measure the effectiveness of the work we do and the impact of our activities. This involves recording the information on a secure database. The information will only be used for monitoring and evaluation and will not affect the individual in anyway.

1.14. How you can complain

If you are not happy with our privacy policy or if have any complaint, then you should tell us by email. Our address is info@sensorcity.co.uk.

If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

1.15. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- To provide you with the services you have requested;
- To comply with other law, including for the period demanded by our tax authorities; and,
- To support a claim or defence in court.

1.16. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website and/or receive emails and newsletters from us.

17 Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at:

Info@sensorcity.co.uk