

## Visit Exeter

### Privacy Policy

#### 1. Introduction

**Exeter City Council is strongly committed to safeguarding your privacy. This Privacy Policy explains our policy for the collection and use of information about you and your transactions with us.**

We reserve the right to make changes to this Policy at any time. Your continued use of our products, applications, services and websites that are subject to this Policy will signify your acceptance of any and all changes to this Policy made by us from time to time.

Exeter City Council is the data controller in connection with any personal information collected or received by us arising from your use of any of our products, services, applications, websites and customer support communications.

#### 2. How we use your personal data

In this section we have set out:

- the general categories of personal data that we may process
- the purposes for which we may process personal data; and
- the legal basis for the processing

We will process your personal data in accordance with the General Data Protection Regulation 2018 and the Data Protection Act. We maintain strict security standards and procedures with a view to preventing unauthorised access to your data by anyone, including our staff. We use leading technologies such as (but not limited to) data encryption, fire walls and server authentication to protect the security of your data. For all Exeter City Council companies, all of our staff and whenever we hire third parties to provide support services, we will require them to observe our privacy standards and to allow us to audit them for compliance.

#### 2.1 Marketing

We may process information that you provide to us for the purpose of visitor registration, brochure requests, e-newsletters subscriptions and competition entry. This data may be processed for the purposes of sending you the relevant notifications and media.

- E-newsletters - by completing our e-newsletter signup page you are agreeing to receive email marketing communications. These can be unsubscribed from at any time, simply by clicking the unsubscribe link at the bottom of the email.
- Brochure requests - by completing our Brochure Request form you are agreeing to receive brochures from us.
- Competitions - please check the individual terms and conditions associated with each competition. After the competition has closed, your data will be deleted unless you consent to receive further information from us in future.

The legal basis for this processing is consent.

## **2.2 User Generated Content**

### **2.2.1 Social Media**

If you use any of our social network pages or applications or you use one of our products or services that allow interaction with social networks, we may receive information relating to your social network accounts. For instance:

- If you click on a 'like', '+1' or 'tweet' or similar button in one of our websites or services, we may record the fact that you have done so. In addition, the content that you are viewing may be posted to your social network profile or feed. We may receive information about further interactions with this posted content (for example, if your contacts click on a link in the posted content), which we may associate with the details that we store about you
- If you 'like', '+1' or similar one of our pages on a social network site, we may receive information about your social network profile, depending on your social network account privacy settings.

For more information and for details about how you can control access to your social network profile, you should view the privacy policy and other guidance available on your social network's website.

### **2.2.2 Reviews, comments and content**

Where you have uploaded product reviews, comments or content to our websites or services and made them publicly visible, we may link to, publish or publicise these materials elsewhere including in our own advertisements.

### **2.2.3 Forums**

Each time you create or reply to a post or thread on a website forum from us, in addition to providing this forum service, we may also record the forum name and the time and date of your post or thread with your account details. We do this to better understand the 'typical users' of our forums and to select or tailor our marketing communications to reflect your forum activity. We do not use the actual content of your forum posts or threads for purposes of sending marketing communications.

The legal basis for processing in 2.2.1, 2.2.2 and 2.2.3 is legitimate interest.

## **2.3 Legal Obligation**

In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary for compliance with regulatory and legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **3. Providing your personal data to others**

We may use other third party service providers to provide certain data processing services for us (acting as our authorised data processors). Examples of authorised data processors could include billing and fulfilment partners, IT solution providers, data analytics providers

who process information on our behalf for the purposes outlined above. For example, we may use the services of third parties to personalise content, fulfil orders, deliver packages, send postal mail and emails, provide marketing assistance, provide fraud checking services and provide customer services.

When acting as our authorised data processors, our service providers are required to only process data in accordance with our instructions, in line with this Policy, and are subject to appropriate confidentiality and security obligations.

In addition to the specific disclosures of personal data set out in this section, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

#### **4. International transfers of your personal data**

We store your data on our secure servers in the United Kingdom and retain it for a reasonable period or as long as the law requires. However, your data may be transferred to, stored at, and processed at a destination inside or outside the European Economic Area by our partners or service providers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

#### **5. Retaining and deleting personal data**

This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

- Personal data that we process shall not be kept for longer than is necessary for that purpose or those purposes.
- Your personal data will be retained for 5 years following the date you cease to be a client, or longer as required to meet our regulatory obligations.
- Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests.

#### **6. Links to third party sites**

Some of our websites may contain links to other third party websites that are not operated by us. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security or privacy practices of those third party websites. We strongly encourage you to view the privacy and cookie policies displayed on those third party websites to find out how your personal information may be used.

#### **7. Amendments**

- We may update this policy from time to time by publishing a new version on our website.
- You should check this page occasionally to ensure you are happy with any changes to this policy.

- We may notify you of changes to this policy by email or through private messaging system or via our website.

## **8. Your Rights**

In this Section we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to the supply of appropriate evidence of your identity. For this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address.

In practice, you will usually either expressly agree (opt in) in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

## **9. Cookies**

By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

### **9.1 About Cookies**

A cookie is a simple text file that is stored on a user's computer (or mobile device) that is created when a user visits a website using a program called a browser (Chrome, Internet Explorer, Firefox or Safari).

A cookie isn't a program itself and doesn't actively do anything on a user's computer. A cookie cannot be used to identify a user personally but they do contribute to improving a user's experience of a website.

A cookie simply allows the website to read the contents of the cookie text file. The text file itself simply contains a unique identifier code; the site name and some digits and numbers.

## **9.2 Why are Cookies used?**

Most websites will use cookies in order to improve the user experience by enabling the website to 'remember' the user, either for the duration of the visit or for repeat visits.

Cookies do lots of different jobs, such as:

- remembering what items a user may have added to a shopping basket or an itinerary as the user moves between pages on a website
- saving a user's preferences to allow them to customise a website
- measuring what users do on a website to ascertain which parts of a website are popular, how long they spend on a website, how often users return, where they come from etc.

## **9.3 What Cookies are used by this site?**

Cookies are set by this website (first party cookies) but may also be set by other websites (e.g. You Tube) that run content on the website's pages (third party cookies).

Cookies can be set to remember a visitor for the duration of their visit (session cookies) or to remember a visitor for repeat visits (persistent cookies).

## **10. About Us**

The website is owned and operated by Exeter City Council

Our principle place of business is: Exeter City Council, Civic Centre, Paris Street, Exeter, EX1 1JJ.

Contact us on tel: 01392 265209; email: [visit.exeter@exeter.gov.uk](mailto:visit.exeter@exeter.gov.uk)

Data Protection Officer – Lorraine Betts. Tel: 01392 265257. Email: [Lorraine.betts@exeter.gov.uk](mailto:Lorraine.betts@exeter.gov.uk)