

# Headington Liveable Streets

## Data processing notice

### Who we are

We are Headington Liveable Streets, a group residents from across Headington who have come together to build on 20 years of community effort and work with the local community to make our neighbourhoods safer, healthier and more attractive places to live, enhance community togetherness, support active and healthy travel options for residents and people travelling here and address speeding.

For the purposes of UK and EU data protection laws, we are the controller of the personal data collected via our surveys, petitions and mailing list sign-up and any other actions we organise using the Action Network platform.

We can be contacted by email at [headington@oxlivsts.org.uk](mailto:headington@oxlivsts.org.uk) or by phone on 07553 913813. You can also visit our webpage at [www.oxlivsts.org.uk/headington](http://www.oxlivsts.org.uk/headington).

### The types of personal data we collect

- **Mailing list data:** Personal data you submit if you sign up to join our mailing list using our 'Join our mailing list' form, including email address, postcode and country (mandatory) and first and last name (optional), or if you sign up to join our mailing list when you complete one of our surveys or petitions, including email address and country (mandatory) and first and last name and post code (optional).
- **Survey data:** Personal data you submit if you complete our surveys, including email address (mandatory), first and last name (optional), post code (optional), country (mandatory) your neighbourhood and household type (mandatory) and travel mode (one mandatory, second optional).
- **Membership data:** Personal data you submit if you sign up to join our membership using our 'Join us!' form, including your first name, last name and email address, your connection to Headington (whether you live, work or travel to or through Headington), confirmation that you are aged 16 or over (all mandatory) and the name of the road you live on (optional).
- **Petition data:** Personal data you submit if you sign our petitions, including first and last name (optional) and post code and email address (mandatory).
- **Correspondence data:** personal data you submit if you contact us by phone or email, including your name, email address/phone number, any personal data you include in the content of your correspondence and metadata associated with the correspondence such as date and time of the email/call.
- **Usage data:** data about your use of our Action Network pages, some of which can be deemed personal data under UK and EU data protection laws, including:
  - your computer's IP address, browser type and operating system, bandwidth speed, information about the software programs that are installed on your computer
  - web pages you were visiting immediately before and after you visited our pages, web pages that you view and links that you click on within our pages
  - standard server log information
  - information collected through cookies (see '**Cookies on Action Network**' section for more detail)

- if you access our pages through a mobile device, the type of mobile device, your device's unique ID, the type of mobile Internet browser and operating system you use, and the location of your device
- information collected by Action Network from third-party sources and platforms, including unique identifiers, including mobile device identification numbers that can identify the physical location of such devices.

## Our purposes and legal basis for processing personal data

### Our main purposes

- **Mailing list data:** We will use this to send emails about our campaign and actions, including relevant updates, news, information, feedback, new actions and opportunities to get involved.
- **Survey data:** We will use this information to find out what people think about the issues addressed in our surveys, understand how people's views correlate to the neighbourhoods and streets they live in and their household type and preferred travel modes, assess the level of concern about the issues addressed and the level of support for potential measures and solutions. We intend to produce and share anonymous and aggregated survey results to further our overall aims, for example by demonstrating levels of engagement/concern/support about the issues we are addressing and potential measures to address them. We will never publish or share personal data included in survey data – we will only use aggregated statistics that cannot be used to identify any individual. We may publish quotes from free-text comments submitted by respondents but would not name the respondent who submitted the comment.
- **Membership data:** We will use this to send emails to members that are relevant to membership, including notifying members about dates of General Meetings and relevant updates, news, information, feedback, new actions and opportunities to get involved. We will also use it to understand our members' connections with Headington, for example, whether they live, work or regularly travel to, or through, the Low Traffic Neighbourhood zones, and which roads our members who are Headington residents live on. We may also use it to email members living in certain areas or on certain roads to invite their views about issues affecting those areas or roads. We may use and publish information in an anonymous and aggregated form derived from this data to demonstrate how our members are connected to Headington, and if they are Headington residents, which areas they live in. We will never publish or share personal data included in membership data – we will only use aggregated statistics that cannot be used to identify any individual.
- **Petition data:** We will use this to demonstrate support for the action proposed in the petition. We may publish and share the outcome of our petitions but will not publish personal data submitted by petition-signers. However, the organisation(s)/individual(s) to whom the petition is addressed will be given a copy of the petition, which will include the email addresses and postcodes submitted.
- **Correspondence data:** We will use this to respond to your query, comment or suggestion.
- **Usage data:** Action Network use this to provide us with statistics that enable us to understand how many people have taken action over time, which websites are driving the most people to our actions, which individuals are referring the most people to our actions and which source codes are generating the most actions (e.g. email link, twitter link, direct link). We only see this data as aggregated statistics, which do not enable us to identify any individuals.

### Our legal basis for these purposes

Our legal basis for processing personal data for the purposes described above is our 'legitimate interests' (meaning that the processing of personal data is necessary for the purposes of our legitimate interests,

except where such interests are overridden by the interests or fundamental rights and freedoms of the individuals to whom the personal data relate). Our legitimate interests are our aims to improve our local neighbourhoods and streets for the benefit of all people who live in and travel around Headington, and engaging with the local community, building a network of support and demonstrating public engagement and support in relation to these aims.

### Other purposes

In addition to the purposes set out above, we may also need to process personal data for the following purposes, in which case we would rely on the legal bases set out and explained below:

<b>Purpose</b>	<b>Legal basis (and description)</b>
Compliance with a legal obligation such as a statutory or regulatory obligation or an order of a court, government body or regulator	Compliance with a legal obligation (processing of personal data is necessary for compliance with a legal obligation imposed by UK or EU law)
Protecting a person's vital interests	Protection of vital interests (processing of personal data is necessary to protect the vital interests of any individual)
Establishing, exercising or defending legal claims	Our legitimate interests in defending legal claims brought against us, enforcing claims against others and protecting and asserting our legal rights and the legal rights of others
Obtaining or maintaining insurance coverage, managing risks or obtaining professional advice	Our legitimate interests in protecting ourselves against risks

In these circumstances, we would only use personal data if and to the extent necessary for the relevant processing purpose.

### Recipients of personal data

#### **Action Squared, Inc.**

Action Squared, Inc. processes all the data collected via our Action Network action pages on our behalf as a processor. This processing is governed by a data processing agreement between us and Action Squared, Inc., which obliges Action Squared, Inc. to process the personal data only for the purpose of providing the Action Network services to us and to do so in compliance with UK and EU data protection laws.

#### **Petition addressee(s)**

Any petition we carry out will be presented to the organisation(s) or individual(s) to whom the petition is addressed, which would include the email addresses and postcodes collected by the petition.

#### **Others**

There may also be circumstances in which we need to share personal data with other organisations or individuals, such as where disclosure is necessary for the purposes set out in the '**Other purposes**' section above, for example if we have to comply with a legal obligation to disclose information. In such cases, we would only share personal data with such recipients where and to the extent necessary for the relevant processing purpose and in accordance with data protection law.

### International transfers of personal data

Although we are all based in the UK, our use of the Action Network platform involves a transfer of the data collected by our Action Network action pages to Action Squared, Inc. and its sub-processors in the U.S. and elsewhere outside of the UK and European Economic Area (EEA).

Action Squared, Inc. has entered into Standard Contractual Clauses with us as part of the data processing contract between us.

Standard Contractual Clauses are standard data protection clauses for data transfers between EEA and non-EEA countries adopted by the European Commission pursuant to a decision of the European Commission that those clauses provide an adequate level of protection for personal data transferred between the parties to those clauses. See the Europa website for more information on, and links to, the standard contractual clauses: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en). (The 'EU controller to non-EU or EEA processor' is the applicable version.)

We cannot provide a copy of the Standard Contractual Clauses or the data processing contract that we have entered into with Action Squared, Inc. without first obtaining the written consent of Action Squared, Inc., as the contracts are subject to confidentiality obligations. If you would like to see a copy, please email [headington@oxlivsts.org.uk](mailto:headington@oxlivsts.org.uk) with your request, and we will request permission from Action Squared, Inc. to provide this to you.

## Retention and deletion of personal data

We will retain the personal data described in this notice for as long as necessary to fulfil our legitimate purposes. When we terminate our Action Network account, Action Squared, Inc. will delete the data held within the account except to the extent that it is required by applicable law to retain any of it, and any data that has been archived on its back-up systems will be securely isolated and not processed further, except to the extent required by applicable law.

## Security of personal data

We will take appropriate technical and organisational security measures to secure the personal data we process and prevent accidental or unlawful destruction, loss or alteration and unauthorised disclosure of, or access to, that personal data.

Action Squared also undertakes to implement and maintain appropriate technical and organisational security measures to protect the personal data we collect via Action Network in its data processing contract with us.

Unfortunately, the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

We will notify affected individuals and any applicable regulator of any personal data breach where we are legally required to do so.

## Cookies on Action Network

Action Squared, Inc. uses cookies on the Action Network platform, including our Action Network pages. We are not able to change the use of these cookies. Please see the Action Network Cookie Notice for information about the cookies used: <https://actionnetwork.org/cookies>.

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Opera: <http://www.opera.com/help/tutorials/security/cookies/>
- Internet Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- Safari: <https://support.apple.com/en-gb/HT201265>
- Edge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

## Your rights in relation to your personal data

You have a number of rights you might be able exercise against us in relation to personal data about you that we process. These are rights to:

- access your personal data
- obtain rectification or erasure of your personal data
- restrict and/or object to processing of your personal data
- have your personal data ‘ported’ to you or another organisation
- complain to a supervisory authority about our processing of your personal data
- withdraw consent to processing of your personal data (where you have given consent)

The availability of these rights varies depending on the legal basis that we rely on for processing the relevant personal data. As we do not rely on consent or performance of contract as the legal bases for any of our processing, the rights to have data ‘ported’ or withdraw consent do not apply to our processing.

**How to exercise these rights against us:** You can exercise any of your rights in relation to your personal data that require any action by us by emailing your request to [headington@oxlivsts.org.uk](mailto:headington@oxlivsts.org.uk) or texting your request to 07553 913813.

**How to complain to a supervisory authority:** To make a complaint to a supervisory authority, you may contact the supervisory authority of your choice using contact details made available by that supervisory authority. Relevant contact details for the UK supervisory authority, the ICO, can be found here: <https://ico.org.uk/concerns/>.

**How to stop receiving emails from us:** If you wish to stop receiving emails from us, you can click on the ‘changing your subscription preferences’ link at the bottom of our emails or contact us by email at [headington@oxlivsts.org.uk](mailto:headington@oxlivsts.org.uk) or by phone on 07553 913813.

## Contact details

For enquiries relating to this notice or our processing of personal data, please contact [headington@oxlivsts.org.uk](mailto:headington@oxlivsts.org.uk).

## Changes to this notice

We may update this notice from time to time by publishing a new version on our Action Network pages and, where any changes materially affect you, we will also make reasonable efforts to notify you.

This notice was last updated on 30th October 2020 (to reflect our new collection of membership data).