ProtectUK

Privacy Policy

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1. Introduction

Welcome to the ProtectUK privacy policy.

ProtectUK respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used.

2. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how ProtectUK collects and processes your personal data through your use of this website, including any data you may provide through this platform/website when you sign up for notifications.

ProtectUK is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

The Commissioner of the Metropolitan Police Service is the controller and responsible for your personal data (collectively referred to as the Metropolitan Police Service or MPS as hosts of the National Counter Terrorism Security Office (NaCTSO), the operators of ProtectUK, "we", "us" or "our" in this privacy policy).

Data Protection Officer

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise [your legal rights], please contact the DPO using the details set out below.
The Data Protection Officer is Darren Curtis. You can contact him at:

DataProtection_FreedomofInformationOfficer@met.police.uk
Information Rights Unit
PO Box 313
Sidcup
DA15 0HH

The MPS's Information Rights Unit manages the MPS's data protection compliance and can be contacted at: mpsdataoffice@met.police.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was created on 15/09/2021 and is the first version.
It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

3. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes [first name, last name, username or similar identifier, title].
- **Contact Data** includes [email address and telephone numbers].
- **Technical Data** includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website].
- **Profile Data** includes [your username and password, your business sector, interests, preferences, feedback and survey responses].
- **Usage Data** includes [information about how you use our website, products and services].
- **Marketing and Communications Data** includes [your preferences in receiving notifications and your communication preferences].

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you access interactive content such as forums and webinars which require user registration).

4. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity and contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
- create an account on our website;
- subscribe to our service or publications;
- request notifications and alerts to be sent to you;
- enter a survey; or
- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie policy.
- **Third parties or publicly available sources**. We will receive personal data about you from various third parties [and public sources] as set out below:
  Technical Data from the following parties:
    - (a) Contracted, vetted and accredited technical suppliers partners based within the UK;
    - (b) Contracted, vetted and accredited analytics partners based within the UK;

5. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

See clause 11 to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we rely on consent for processing your personal data. We will get your consent before sending direct alerts or notifications (communications) to you via email or text message. You have

the right to withdraw consent to marketing at any time through preference settings or by contacting us directly.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are e appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To register you as a user of ProtectUK	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our website content).
To administer and protect our	(a) Identity	(a) Necessary for our legitimate

business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(b) Contact (c) Technical	interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of the ‘advertising’ we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To investigate any actual or	(a) Identity	(i) Performance of a contract with

suspected breach of the terms of use of ProtectUK	(b) Contact (c) Technical (d) Usage (e) Profile	you (ii) Performance of a task carried out in the public interest or in the exercise of official authority vested in us.
Storage of your personal data for the purpose set out in this table	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Performance of a contract with you

We strive to provide you with choices regarding certain personal data uses, particularly around alert and general notifications. You are able to select your subscription and notification preference within your profile settings.

Notifications from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and articles may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us and you have not opted out of receiving that marketing.

Third-party marketing

We will not share your personal data with any third party for marketing purposes.

Opting out

You can ask us to stop sending you notifications at any time [by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of registration, product/service experience or other transaction.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our COOKIE POLICY.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. We will notify you should we do this. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so, subject to paragraph 6.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosures of your personal data

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Registered members of ProtectUK: Your screen name will be shared with all registered members of the ProtectUK via display on your profile page. It is also always attached to any content you post or social interaction you make, along with data about when the activity happened.
- Other third parties: Network and Group Administrators, so they can facilitate and support networks and groups you belong to, our service providers who provide IT and systems administration support services, so they can technically support and administer the site. Our system administrators have access to all content on our site, including user profiles, content which is posted by members and content on all Networks and Group pages. This is to enable our system administrators to perform their roles in supporting and maintaining our site, responding to (and resolving) issues or problems that are reported to us and ensuring that our site remains available to members in accordance with our website terms of use.

- Business support partners: We may also disclose your information to external agencies that provide ProtectUK with business support. All such partners are approved by us.
- We have identified the types of personal data that is collected on ProtectUK and who it is shared with in more detail in the table below:

Type of personal data:	**Shared With:**
First name, surname	Network, System and Group Administrators
Screen name	Registered members of ProtectUK
Email address	As per user's privacy settings, and Other Third Parties (Network and Group Administrators) on request
Job title, organisation	As per user's privacy settings, and Other Third Parties (Network and Group Administrators)
Biography, location, website, social media accounts, phone number, interests, skills	Network and Group Administrators
Content uploaded by user and social interactions	Users who browse ProtectUK
Group memberships and Connections	Registered members of ProtectUK
Last login and contribution dates)	Other third parties (Network and Group Administrators
Last pages visited	Other third parties (Network and Group Administrators)
Full user profile details	System administrators

We also may disclose your identity to any third party who is claiming that any content posted or uploaded by you to our site constitutes a violation of their intellectual property rights, in accordance with our Acceptable Use Policy.

We do not sell, trade or rent your information to other parties.

We reserve the right to give your personal information to a third party without your consent where we believe that such disclosure is:

- Required by law;
- Necessary to assist in the prevention or detection of any criminal action; and
- Is in the overriding public interest and is permitted by law.

7. International transfers

We do not transfer your personal data outside the United Kingdom.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory or other requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

When you delete your account on ProtectUK we shall retain your personal data for a period of six months from the date you delete your account for the purpose of investigating any actual or suspected breach of the terms of use that may be notified after the date you delete your account.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include rights to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data

- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us at mpsdataoffice@met.police.uk or ProtectUK.police.uk/contact

Or via:

MPS Information Rights Unit
PO Box 313
Sidcup

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. Glossary

Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your

consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Your Legal Rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.

- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.