



Privacy Notice

Portsmouth Naval Base Property Trust Website Visitors

1. Introduction

The Portsmouth Naval Base Property Trust is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your visit to our website, in accordance with the General Data Protection Regulation (GDPR).

The Trust is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to visitors to the PNBPT website (www.pnbpt.co.uk). We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are informed of how and why we are using such information.

2. Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. The Information We Hold 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, store, and use the following categories of personal information about you:

- questions, queries or feedback you leave, including your email address if you contact IBTC Portsmouth
- how you use our emails - for example whether you open them and which links you click on
- your Internet Protocol (IP) address, and details of which version of web browser you used
- information on how you use the site, using cookies and page tagging techniques

4. How We Will Use Your Personal Information

We use Google Analytics software to collect information about how you use the PNBPT website. We do this to help make sure the site is meeting the needs of its users and to help us make improvements, for example improving website layout.

Google Analytics stores information about:

- the pages you visit on PNBPT
- how long you spend on each PNBPT page
- how you got to the site
- what you click on while you're visiting the site

We do not collect or store your personal information (for example your name or address) so this information cannot be used to identify who you are.

Google's privacy policy is available at: [google.com/privacypolicy.html](https://www.google.com/privacypolicy.html).

We also collect data in order to:

- improve the site by monitoring how you use it
- respond to any messages you send us, if you've asked us to
- keep a record of your relationship with us
- send email communications to users who request them
- provide third parties with statistical information about our users – but this information will not be used to identify any individual user

5. Data Retention

We will only retain your personal data for as long as:

- it is needed for the purposes set out in this document
- the law requires us to

In general, this means that we will only hold your personal data for a minimum of 1 year and a maximum of 7 years.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

6. How We Protect Your Data and Keep it Secure

We are committed to doing all that we can to keep your data secure. We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We will store all the personal information you provide on our secure servers. Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

We will store all the personal information you provide on our secure servers and make sure that your data is as safe as possible at any stage, both while it's processed and when it's stored.

7. Data Sharing

We may have to share your data with third parties, service providers and other external agencies. We require third parties to respect the security of your data and to treat it in accordance with the law.

Your personal data may, throughout the course of its processing, be transferred outside of the [European Economic Area](#) (EEA). Where this is the case, all appropriate technical and legal safeguards will be put in place to ensure that you are afforded the same level of protection as within the EEA.

8. Rights of Access, Correction, Erasure, and Restriction

8.1 Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please put your request in writing to the Deputy Chief Executive, Portsmouth Naval Base Property Trust, 19 College Road, HM Naval Base, Portsmouth, PO1 3LJ.

A Subject Access Request can be made by completing the Trust's Subject Access Request Form. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, the Trust may charge a reasonable fee if a request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Deputy Chief Executive. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

8.2 Data Protection Lead

We have appointed a data protection lead to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Deputy Chief Executive.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Information Commissioner's Office:

Helpline 0303 123 1113

Live chat service www.ico.org.uk/livechat

9. Links to Other Websites

The PNBPT website contains links to other websites.

This privacy policy only applies to the PNBPT website, and doesn't cover other websites that we link to. These services have their own terms and conditions and privacy policies.

9.1 Following a link to another website

If you go to another website from this one, please read the privacy policy on that website to find out what it does with your information.

9.2 Following a link to PNBPT from another website

If you come to PNBPT from another website, we may receive information from the other website. We don't use this data. You should read the privacy policy of the website you came from to find out more about this.

10. Changes to This Privacy Notice

We may change this privacy policy. In that case, the 'last updated' date at the bottom of this page will also change. Any changes to this privacy policy will apply to you and your data immediately.

If these changes affect how your personal data is processed, the Portsmouth Naval Base Property Trust will take reasonable steps to let you know.