Oxfordshire Liveable Streets

Privacy notice

Who we are

We are Oxfordshire Liveable Streets, a private limited company by guarantee incorporated in England and Wales with company number 11469098, whose registered office is at 17 Bourne Close, Oxford, England, OX2 8NH ("**OLS**", "**we**", "**our**").

Our aims and objectives as an organisation are to advocate for an Oxfordshire where all people—those who drive and those who don't—can move around in ways which are affordable, easy, quick, safe and pleasant. We want a county where buses are fast and reliable. A county where people can be active and move more as part of their daily lives. A county with clean air. A county where the streets and roads look and feel nice. We believe that solutions should focus on overall improvements for the people most affected by transport poverty, public health inequalities, air pollution and poor public spaces.

For the purposes of applicable data protection laws, we are the controller of the personal data described in this notice.

Our data protection officer is Hannah Kirby, who can be contacted at hannah@oxfordshireliveablestreets.org.

We can be contacted by email at hello@oxfordshireliveablestreets.org. You can also visit our webpage at https://www.oxfordshireliveablestreets.org/ and view our company registration at Companies House.

The types of personal data we collect

- **Membership data**: data you submit if you choose to sign up to become a member of OLS using our membership sign-up form, including your first name, last name, email address, postcode and membership type (mandatory) and contact number, house name/number and street, town and county (optional).
- **Mailing list data**: data you submit if you choose to:
    - sign up to join our general mailing list using our mailing list sign-up form or indicate on the membership sign-up form or any other of our forms that you want to be added to our general mailing list;
    - sign up to join a specific mailing list using a sign-up form for that mailing list,

  which will include your email address and postcode and may include your first name, last name and any other information requested in the relevant sign-up form. The sign-up form will indicate what information is mandatory or optional.
- **Participatory data**: data you submit if you choose to take part in any of our actions such as petitions, adding your name to a letter or completing surveys, which is likely to include your email address, first name and last name and may include other information requested in the relevant action form. The action form will indicate what information is mandatory or optional.
- **Event data**: data you submit if you choose to attend any of our events, which is likely to include your email address, first name, last name and may include other information requested in the relevant event registration form.
- **Correspondence data**: data we obtain if you choose to contact us, including your name, email address, related communications data such as the date and time of your communication and any other personal data you choose to include in your message.

- **Fundraising data**: data we obtain if you choose to donate to a fundraising project, including your name, email address, and payment information.
- **Canvassing data**: data we collect in connection with our door-knocking activities carried out by our volunteers, which includes the following information relating to the people we talk with:
    - building number and street name
    - name or description of person spoken with
    - the person's views on liveable streets measures or other topic which is the subject of the activity
    - date of conversation
    - next action as proposed by volunteer
    - volunteer's insights about the person's views
- **Technical user data**: data that is automatically collected when you use our websites and forms, 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
    - if you access our websites and forms 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
    - unique identifiers, including mobile device identification numbers that can identify the physical location of such devices
    - email openings and click-throughs

    This information is collected using cookies and similar technologies (see '**Cookies**' section below for more detail).
- **Video footage data**: video taken in public places related to vandalism and theft of traffic management equipment, provided to us by our members or members of the public, which may contain images of people who may or may not be identifiable by us or others.

Our purposes and legal basis for processing personal data

Our main purposes

Purpose	Personal data used	Legal basis
Managing our membership subscriptions and fees.	Membership data Technical user data	Our legitimate interests in maintaining a membership base, communicating with people, pursuing targeted actions and building our supporter base, relationships with local communities and our understanding of people's views and experiences of liveable streets issues for
Sending email communications to our members and people who have signed-up to our mailing lists, including advertising events, inviting people to take part in our actions and providing news updates and other relevant information.	Mailing list data Technical user data	
Coordinating targeted actions such as petitions, letters and surveys.	Participatory data Technical user data	
Organising and running events.	Event data	

Compiling, managing and using a database of members, supporters and people who have taken part in our actions to inform our campaigning strategy, send appropriate communications in line with people's communication preferences and previous engagement with us and understand how successful our email campaigns have been.	Membership data Mailing list data Participatory data Event data Technical user data	the purpose of pursuing our objectives.
Responding to queries, comments or suggestions from people who contact us.	Correspondence data Technical user data	
Carrying out fundraising activities to raise funds for OLS generally or specific OLS campaigning activities.	Fundraising data Technical user data	
Carrying out canvassing activities in order to: • Build relationships with people. • Inform people about liveable streets issues. • Learn and understand more about people's views and experiences of liveable streets issues. • Find out who is supportive of OLS objectives. • Encourage people to become OLS members and/or sign up to our mailing lists. • Encourage and assist people to complete consultations concerning liveable streets issues by Oxfordshire County Council and other organisations. • Build a database to inform future door-knocking and contact priorities and efforts for OLS and its volunteers and to analyse for the purpose of producing statistics on views relating to liveable streets measures to inform our understanding and future campaigning strategy.	Canvassing data	
Operating a website.	Technical user data	
Analysing how people use and interact with our website to inform our campaigning strategy and improve and develop our website.	Technical user data	Consent via cookie preference tool.
Publishing video footage of vandalism and theft of traffic management equipment on our social media accounts and third party news media to raise public awareness.	Video footage data (We remove any personally identifying data from the images as soon as we receive the footage.)	Our legitimate interests in raising public awareness of the criminal activity affecting traffic management schemes. If any criminal offence data is included in the footage, we rely on the condition in the Data Protection Act 2018 Schedule 1, Part 3 Paragraph 32 (Personal data in the public domain).

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:

Purpose	Legal basis (and description)
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 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

Service providers

Action Network
Action Squared, Inc. provides the Action Network platform, which stores and processes membership data, mailing list data, participatory data, event data and technical user data collected via our mailing list sign-up forms and action forms hosted on the Action Network platform. We use this for our purposes of compiling, managing and using a database of members, supporters and people who have taken part in our actions to inform our campaigning strategy, send appropriate communications in line with people's communication preferences and previous engagement with us and understand how successful our email campaigns have been.

Squarespace
Squarespace Ireland Limited hosts and provides our website and the contact form on our website and provides us with analytics data about people's visits to our website, which involves storing and processing technical user data and correspondence data. We use Squarespace to operate our website and analyse how people use and interact with our website to inform our campaigning strategy and improve and develop our website.

PayPal
PayPal (Europe) S.à r.l. et Cie, S.C.A provides the PayPal payment processing service, which handles card payments to us made via our website, such as membership fees.

Membermojo
Membermojo Limited provides the membership management platform we use, which stores and processes the membership data and some technical user data collected via our membership sign-up form hosted on the Membermojo platform for our purposes of managing member subscriptions and fees.

Airtable
Formagrid, Inc. dba Airtable provides the Airtable data management platform which we use to store, manage and analyse canvassing data.

Google forms
Google LLC provides the digital forms and underlying cloud platform we use to record canvassing data during our door-knocking activities.

Processing of personal data by these service providers is governed by data processing agreements between us and the service providers which requires them to process the personal data only for the purpose of providing their services to us and to do so in compliance with data protection laws.

Other third parties

News media organisations

We may pass video footage onto news media organisations to reach a wider audience. However, if people are identifiable in the video footage we receive, we apply anonymization techniques to the footage, such as blurring or obscuring faces and vehicle number plates, before passing it to news media organisations.

Addressee(s) of our actions
The data we collect via our action forms will, where applicable, be shared with the organisation(s) or individual(s) to whom the action – such as a letter or petition – is addressed. The relevant action form will indicate what information is mandatory or optional in order to take part in the action, who the addressees of the action are and what information will be shared with them.

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 if 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 based in the UK, our use of the service providers listed above involves some transfers of personal data outside the UK.

Below we have set out the transfers involved and the safeguards used to protect the personal data transferred in accordance with the standards of UK data protection law:

Service provider	Data transfers	Safeguard
Action Squared, Inc (Action Network platform)	To Action Squared, Inc. and its sub-processors in the USA and elsewhere outside of the UK and European Economic Area (EEA)	Standard Contractual Clauses incorporated into a data processing addendum between us*
Squarespace, Inc.	To the USA and other countries in which Squarespace or any of its sub-processors operate	EU-U.S. Data Privacy Framework, Swiss-U.S. Data Privacy Framework and UK Extension to the EU-U.S. Data Privacy Framework and Standard Contractual Clauses incorporated

		into the Squarespace Data Processing Addendum
PayPal (Europe) S.à r.l. et Cie, S.C.A	Various locations in connection with providing the services	Standard Contractual Clauses and Binding Corporate Rules referred to in the Paypal Data Protection Addendum
Membermojo Limited (Membermojo platform)	None – UK only	N/A
Formagrid, Inc. dba Airtable	To Formagrid, Inc. and its sub-processors in the USA and elsewhere outside of the UK and European Economic Area (EEA)	Standard Contractual Clauses incorporated into a data processing addendum between us**
Google LLC	Any country in which Google or its sub-processors maintain facilities	Standard Contractual Clauses incorporated into the Google Cloud Data Processing Addendum

*We cannot provide a copy of the Standard Contractual Clauses or the data processing addendum 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 info@oxlivsts.org.uk with your request, and we will request permission from Action Squared, Inc. to provide this to you.

**We are not able to provide a direct link to the Airtable data processing addendum. If you would like to see a copy, please email info@oxlivsts.org.uk with your request.

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 accounts with our service providers (Action Squared, Inc., Squarespace, Inc., Crowdfunder Limited, Membermojo Limited, Formagrid, Inc and Google LLC) they will delete the data held within the account except to the extent that they are required by applicable law to retain any of it.

We only store video footage in anonymised form, after removing any identifying data by blurring or obscuring faces and numberplates, and delete all non-anonymised versions.

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.

Our service providers also undertake to implement and maintain appropriate technical and organisational security measures to protect the personal data they process on our behalf in their data processing agreements 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

Cookies are small pieces of text sent to your browser when you visit a website. They serve a variety of functions, like enabling websites to remember information about visitors as they navigate between pages.

We use the following types of cookies on our website:

- necessary cookies that allow visitors to navigate and use key features of the site, and
- analytics and performance cookies that collect information on how visitors interact with the site, such as how many people have visited and where they came to the site from.

The necessary cookies are needed to enable visitors to navigate and use key features of our site.

We use analytics and performance cookies to see what content people are finding most useful on our site, what communications campaigns are most successful at bringing people to the site and if people are finding us when they are searching for relevant key terms. This helps us provide a website that is helpful and easy for people to find. We use Squarespace cookies, which collect information on how visitors interact with our site, such as how many people have visited and where they came to the site from. We also use Google Analytics cookies, which track things like how many people come to our site, how they got there and how they interact with the site.

The necessary cookies are always applied, but the analytics and performance cookies will not be placed on your browser until you click "accept" on the cookie banner presented to you on our website. See the Squarespace Help Centre page on cookies used on customer websites and How Google uses cookies for more information.

If you click on our Twitter, Facebook or Instagram links from our website, you will also receive cookies from Twitter, Facebook or Instagram. You can view further information about Twitter's use of cookies at How cookies are used on Twitter | Twitter Help and Facebook's use of cookies at Facebook Cookie Policy.

Membermojo Limited uses cookies on its Membermojo platform and website. You can view further information about Membermojo's use of cookies by visiting its Cookie Notice and can control optional/non-essential cookies using the cookie settings tool available on that webpage.

Action Squared, Inc. uses cookies on the Action Network platform, including our mailing list sign-up and action forms hosted on the Action Network platform. You can view further information by visiting the Action Network Cookies Notice.

You can refuse to accept cookies and delete cookies via your browser settings. For more information about cookies, visit All About Cookies and the ICO's guidance on cookies.

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 info@oxlivsts.org.uk or writing to us at our registered office address (see 'Contact details' section below).

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 unsubscribe links at the bottom of our emails or contact us by email at info@oxlivsts.org.uk or writing to us at our registered office address (see 'Contact details' section below).

Contact details

For enquiries relating to this notice or our processing of personal data, please contact info@oxlivsts.org.uk.

For enquiries relating to membership, please contact membership@oxlivsts.org.uk.

Our registered office address is registered office is at 17 Bourne Close, Oxford, England, OX2 8NH.

Changes to this notice

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