

# Website Privacy Notice



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# Introduction

Office for Public Management Ltd T/A Traverse Ltd ("Traverse", "we", "us", "our") of 2 Angel Square, London, EC1V 1NY are committed to protecting and respecting your privacy. We are committed to the protection of the personal data we process in line with the data protection principles set out in the UK General Data Protection Regulation, the EU General Data Protection Regulation (where applicable) (together the "GDPR") and the Data Protection Act 2018 ("DPA18").

This privacy notice ("Notice") explains how we treat personal information processed on our bespoke platform, Magpie, what we collect when you visit our website, contact us by email, phone or through one of our social channels, or through other communications. It also explains what information we collect automatically when you visit our website and the information we collect when you use our services.

Please be aware that our clients' have their own privacy notices on their respective websites. Our work is predominantly as a processor for our clients'; however, Office for Public Management Ltd T/A Traverse Ltd is the controller for our employee data, for the personal data processed when we run public consultations on our own behalf and for the personal contact details of our clients. As such we are registered as a controller in the UK with the Information Commissioner's Office ("ICO"), registration number Z5095617.

As an information-led business, we place great importance on ensuring the quality, confidentiality, integrity and availability of the data we hold and in meeting our data protection obligations when processing personal data. We are committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

We update this Notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to the products and services we offer. When changes are made, we will update the date at the top of this document. Please review this Notice periodically to check for updates.

# What information do we process?

## Information you provide to our clients

The categories of personal data processed by us varies between clients, determined by the specific requirements of the client project, but may include:

- Name
- Job Title
- Address
- Email address
- Telephone number(s)
- Date of Birth or Age Range
- Gender
- Ethnographic information
- Medical information
- Location data

When processing the "special categories" of more sensitive personal information, including data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health status, sex life or sexual orientation, we do so only where our clients can evidence that they meet one of the conditions required by law for doing so. This will predominantly be with your explicit consent.

## Information you provide direct to us

We process all information you provide to us via our website ("our site"), by telephone, email or otherwise. This includes information you provide when you register for our services as a client, enquire about a product or service, use one of the social media functions linked to our website, or when you report a problem with our website.

The categories of personal data processed may include:

- Name
- Job Title
- Email Address
- Telephone number
- Device information

- Location data

## Cookies and Web Beacons

Traverse uses cookies on our website and web beacons in some emails. Cookies are small text files and web beacons are small graphic images. They are downloaded to your device when you visit a website or receive certain emails, unless you have set your browser to reject them.

We use cookies to remember your preferences and improve your overall experience of our site. We use web beacons to track the actions of individuals (such as email recipients) and measure the success and response rates of our marketing campaigns.

Below is a list of the cookies we use and the purpose of use:

Session Cookies	These enable you to carry out some essential functions on our sites, such as maintaining log-in details for the session or a transaction. They also help by minimising the need to transfer information across the internet. They are not stored on your computer and expire when you terminate your browser session or logout of certain areas.
Analytics	We like to keep track of what pages and links are popular and which ones don't get used so much to help us keep our site relevant and up to date. It's also very useful to be able to identify trends of how people navigate our site and help us provide a more friendly solution.
Third-party cookie	Analytics tracking (and most web tracking software) use cookies in order to provide meaningful reports about site visitors. However, analytics cookies do not collect personal data about website visitors.

To learn more about cookies, web beacons and what you can do to opt out of receiving them, please visit <https://www.allaboutcookies.org/>

# Purposes and bases for processing your personal data

We may use your data for the following purposes and on the following lawful bases:

Purpose	Lawful Bases for Processing
Responding to correspondence from you	It is in our legitimate interest to respond to enquiries made by telephone, email, through our social channels or any other means
Processing data to facilitate client research projects	We process your data under written instruction, bound by the specific consent received by our client
Business management, forecasting and statistical purposes	It is our legitimate interest to identify areas for managing current business relationships, develop our services and for managing our business
Improving our website and the overall website visitor and user experience	It is our legitimate interest to allow analytics and search engine providers to help improve and optimise our website
Improving our website and the overall website visitor and user experience	We use cookies on our website with your consent
Prevention and detection of crime including money laundering, fraud or other crimes	We have a legal obligation to report any such activity to the relevant authorities and regulators
Responding to suggestions and complaints in order to continually improve the services we provide	It is our legitimate interest to provide the best service to users of our website and to increase features in order to continually improve and expand the services we provide
Analyse and track use of our website for reporting and analytical purposes	It is our legitimate interest to monitor our website usage in order to continually improve the user experience

# Sharing your information

We will rarely share your personal data outside the UK or the European Economic Area (the 27 EU member states plus Norway, Iceland and Liechtenstein) ("EEA"). If this becomes necessary for the purposes of providing our services to you, we will only share it where appropriate safeguards are in place, such as Standard Contractual Clauses ("SCCs") and supplementary measures, approved by the UK ICO or European Commission, to ensure your personal data is protected to the same standard expected within the UK and EEA.

On certain projects where large volumes of personal data are to be processed, we may engage the services of a third-party sub-processor. Any such third party will act under our written instructions and will adhere to strict data protection obligations, including the implementation of appropriate technical and organisational measures which meet the processing requirements of the GDPR.

We also use a third party for hosting infrastructure, website performance and management, error monitoring, support and other functionality. The written contract in place between us and this third party provides for the maintenance of confidentiality, security, and integrity of the information we share with them.

Our website includes links to social media platforms (Instagram, Twitter). Once you navigate away from our site via one of the links, the site may collect your IP address and may set a cookie on your device. When you use one of these links, you are sharing information to another website or service and this Notice will no longer apply. Please read the privacy notices provided by the particular service website you are directed to, before posting any personal information using these links.

# Your rights

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- Request access to personal data about you (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 processing it lawfully.
- Request rectification, correction, or updating of any personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request personal data provided by you to be transferred in a structured, commonly used and machine-readable format.
- Request erasure of 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 personal data where you have exercised your right to object to processing (see below).
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you (e.g., if you want us to establish its accuracy or the reason for processing it).
- Object to the processing of your personal data in certain circumstances. This right may apply where the processing of your personal data is based on the legitimate interests of Traverse.

Some of these rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation, laws, and regulations to which we are subject. If at any time you decide that you no longer wish to be contacted for marketing purposes, or if you would like to exercise any of your rights as set out above, you can contact us at [IMSCCommittee@traverse.ltd](mailto:IMSCCommittee@traverse.ltd). 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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In addition to the above, please note that you have the right to make a complaint at any time to the [Information Commissioner's Office](#) if you are concerned about the way in which we are handling your personal data.

# Data retention period

We will retain your personal data for as long as is necessary to provide you with our products and ongoing services and for a reasonable period thereafter, to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted in accordance with our Personal Data Retention and Destruction Policy.

# Contact

You can contact us in relation to data protection and this privacy notice by emailing [IMSCCommittee@traverse.ltd](mailto:IMSCCommittee@traverse.ltd).



Crown  
Commercial  
Service  
Supplier



# TRAVERSE

[www.traverse.ltd](http://www.traverse.ltd)

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