



## **General Privacy Policy**

Your privacy rights are important to us and we are committed to ensuring that your personal information is processed in a safe and lawful way. This Privacy Notice informs you about how we process your personal information and what your rights are. The way we collect, store and process your personal information is governed by data protection legislation.

Be First Regeneration Limited (“Be First”) is the controller for the personal information we process, unless otherwise stated.

### **What personal information does Be First process?**

To provide you with support and services, we need to collect and process information about you. This is your personal information. Personal information is information that relates to a living person, who can be directly or indirectly identified from the data in question or together with other information – and this information must relate to an individual in order to be identified as personal information. For example, this can include:

- Your name
- Location
- Date of birth
- Age
- Gender
- Address
- Postcode
- National Health Service Number

### **Special category personal information**

Some information is more sensitive and needs more protection due to its sensitivity. It is often information you would not want widely known and is personal to you. This is likely to include anything that can reveal your:

- Sexuality and sexual health
- Religious or philosophical beliefs
- Ethnicity
- Physical or mental health
- Trade Union Membership
- Political opinion
- Genetic/biometric data
- Criminal history

Be First obtains your information through various means

We may collect this information from you if you use the contact form in our websites, [www.befirst.london](http://www.befirst.london); [yourcall.befirst.london/](http://yourcall.befirst.london/)

We get it supplied to us directly (or through a planning agent)

We receive it from a third-party website that provides a transaction service. Including; The Planning portal, iApply.

We receive it from Barking and Dagenham Council if you apply to them for one of our services. You can find their privacy policy on the LBBD website.

<https://www.lbdd.gov.uk/general-privacy-notice>

### **Why are we able to process your information?**

The law expects us to define what data we will process and why we will process it before we can use your data for any purpose. We cannot process your data unless a lawful basis has been identified. There are six lawful basis that the Be First can rely on:

- Legal obligation – we need to process your information to comply with the law
- Public task – we need to process your information to provide you with certain services on behalf of LBBD
- Contract – we need to process your information as part of a contract
- Vital interest – we need to process your information to protect someone's life in an emergency
- Consent – we need your permission to use your personal data
- Legitimate interest – we need to process this information for legitimate interests e.g. fraud

### **How we protect your information**

We will do what we can to make sure we hold records about you (on paper and electronically) in a secure way, and we'll only make them available to those who have a right to see them. Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what is called a 'cypher'. The hidden information is said to then be 'encrypted'
- Pseudonymisation, meaning that we'll use a different name or key so we can hide parts of your personal information from view. This means that someone outside of the organisation could work on your information for us without ever knowing it was yours
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it
- Data stewardship is a way for us to be clear about who is responsible for what data and sets out clearly who has access to the data – limiting access to only those who need it to carry out our duties
- All our staff undertake annual mandatory data protection training. Training our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates

### **If Be First is processing your data, what are your rights?**

GDPR sets out the rights you have if an organisation is using your information – this is known as individual rights. Your rights are set out below and can be exercised by you emailing the Data Protection Officer on the details below unless otherwise stated.

#### **Right to be informed**

This general privacy notice is an example of how we keep you informed.

#### **Right of access**

You can request a copy of the information that we hold about you. This is referred to as a Subject Access Request and more information is available in the Subject Access Request Policy:

[Subject Access Request Policy](#) (PDF, 214KB)

#### **Right of rectification**

If you think that some information we hold about you is inaccurate or incomplete, you have the right to request that this be corrected.

### **Right to erasure**

In certain circumstances, you can ask for us to erase any personal information we hold on you.

### **Right of portability**

You have the right to ask for your personal information to be given back to you or another service provider of your choice in a commonly used format. This only applies to personal information we process where consent is the lawful basis, or for the performance of a contract, and the processing of your information is automated (does not include information held on paper).

### **Right to restrict processing**

In certain circumstances you may have the right to request that we limit the way we use your data.

### **Right to object**

You have the right to challenge certain types of processing. The right to object only applies in certain circumstances and depends on the lawful basis for processing. You have the absolute right to object to the processing of your personal data if it is for direct marketing purposes.

### **Rights related to automated decision-making including profiling**

This provides a right not to be subject to a decision based solely on automated processing, including profiling, which has a legal or similarly significant effect on you.

### **Cookies and how you use this website**

To make this website easier to use, we sometimes place small text files on your device (for example your smartphone, iPad or laptop) called cookies. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. We use this information to improve access to the site and identify gaps in the content and see if it is something we should add to the site.

Unless the law allows us to, we do not:

- share any of the data we collect about you with others, or
- use this data to identify individuals

## **Analytics**

We use Google Analytics to collect anonymised information about how you use this site. We do this to make sure it's meeting your needs and to understand how we can make the website work better. We use Google to track:

- what pages you visit
- how long you use the site
- how you got to the site and what links you clicked on

We don't allow Google to share this data with anyone else.

We do not collect or store any other personal information (e.g. your name or address) so this data cannot be used to identify who you are.

## **Other website's cookies**

We use videos from YouTube and Vimeo and feeds from other websites such as Facebook and Twitter. These websites place cookies on your device when watching or viewing these pages.

Further guidance on the use of personal information is available from the [Information Commissioner's Office \(ICO\)](#).

## **How to change cookie settings**

We recommend that you allow the cookies we set by this website as they help us provide a better service.

You can change your cookie preferences on this site at any time by clicking on the 'C' icon at the bottom of the screen. You can then adjust the available sliders to 'On' or 'Off', then click on the X to close the window. If you click the 'Accept recommended settings' button it will switch on the use of analytical and marketing cookies. You may need to refresh your page for your settings to take effect.

Alternatively, most web browsers allow some control of most cookies through the browser settings.

Find out how to manage cookies on popular browsers:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)

- [Apple Safari](#)

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit [Google Analytics opt-out browser add-on](#).

## Turning off cookies

You can use your web browser to delete or block cookies and clear all cookies when you close your browser.

You can stop cookies being downloaded on to your computer or other device by selecting the appropriate settings on your browser. Please be aware our website may not function properly without accepting cookies, by turning them off or deleting them functionality will be lost. Should you wish to delete them after your session, the browser you have used will be capable of deleting any stored cookies.

Further information on deleting and controlling cookies:

- [AboutCookies.org](#)
- [Allaboutcookies.org](#)

## Anonymous browsing

You can also chose to open a 'private' or 'incognito' browser session, which allows you to browse the internet without storing local data.

If you wish to anonymously browse our website please use a browser which supports this function, but remember, if you do not accept cookies your browsing experience will be poor and you may not be able to use the full functionality of the site.

The table below explains the cookies we use on our websites and why.

<b>Website: befirst.london</b>			
<b>Cookie</b>	<b>Name</b>	<b>Purpose</b>	<b>Expiry period</b>
_ga	Google Universal Analytics	This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.	2 years (default)

_gat_gtag_UA_115613771_1	Google Universal Analytics	For targeted advertising	Session
_gid	Google Universal Analytics	This cookie stores and updates a unique value for each page visited.	1 day
wordpress_test_cookie		Tests whether or not the browser has cookies enable	Length of session
YSC	youtube.com	This cookie is set by YouTube to track views of embedded videos.	Length of session
test_cookie	doubleclick.net	This cookie is set by DoubleClick (which is owned by Google) to determine if the website visitor's browser supports cookies. The main purpose of this cookie is: Targeting/Advertising	session
VISITOR_INFO1_LIVE	youtube.com	This cookie tracks user preferences for Youtube videos embedded in sites;it can also determine whether the website visitor is using the new or old version of the Youtube interface.	6 months
IDE	doubleclick.net	DoubleClick is Googles real time bidding advertising exchange	1 year
GPS	youtube.com	Collects user data through videos embedded in websites, which is aggregated with profile data from other Google services in order to display targeted advertising to web visitors across a broad range of their own and other websites.	Session
_hjid	Hotjar	This cookie is set when the customer first lands on a page with the Hotjar script. It is used to persist the random user ID, unique to that site on the browser. This ensures that behaviour in subsequent visits to the same site will be attributed to the same user ID. Hotjar	365 days
_hp2_id.2882696438	Heap Analytics	to track user behaviour on the website	2 years

Website: [yourcall.befirst.london](http://yourcall.befirst.london)

Cookie	Name	Purpose	Expiry period
_ga	Google Universal Analytics	This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.	2 years (default)
_gat	Google Universal Analytics	Used to throttle the request rate - limiting the collection of data on high traffic sites	10 minutes
_gat_gtag_UA_115613771_1	Google Universal Analytics	For targeted advertising	Session
_gid	Google Universal Analytics	This cookie stores and updates a unique value for each page visited.	1 day
YSC	youtube.com	This cookie is set by YouTube to track views of embedded videos.	Length of session
test_cookie	doubleclick.net	This cookie is set by DoubleClick (which is owned by Google) to determine if the website visitor's browser supports cookies. The main purpose of this cookie is: Targeting/Advertising	session
VISITOR_INFO1_LIVE	youtube.com	This cookie tracks user preferences for Youtube videos embedded in sites;it can also determine whether the website visitor is using the new or old version of the Youtube interface.	6 months
lang		store language preferences	Session
_engagementhq_v3	Engagement HQ	These cookies are necessary for enabling the core functionality of the site. The website	2 day(s)

		cannot function properly without these cookies.	
_ehq_session_id	Engagement HQ	helps us to analyse user behaviour, mainly to see if the users are able to find and act on things that they are looking for. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it	Session
_ehq_uid	Engagement HQ	allow us to count the number of visitors and to see how visitors move around our website when they are using it	2 years
_ehq_last_visit	Engagement HQ	allows us to recognise the number of visitors and to see how visitors move around our website when they are using it	2 years

## Contact us

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Email: [dpo@befirst.london](mailto:dpo@befirst.london)

[www.befirst.london](http://www.befirst.london)