



Centre for  
**Strategy & Evaluation  
Services**

# Website data protection, privacy and cookie policy

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Centre for Strategy & Evaluation Services LLP  
(CSES)

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## 1. Introduction

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### 1.1 Purpose of this privacy notice

The Centre for Strategy & Evaluation Services LLP (hereafter “CSES”) is a public policy consultancy which offers multidisciplinary research and consultancy services.

This document sets out CSES’s data protection, privacy and cookie policy in respect of the CSES website ([www.cses.co.uk](http://www.cses.co.uk)). CSES respects the privacy of website users and are determined to protect your personal data. The purpose of this privacy notice is to inform our website users as to we how collect and process your personal data through your use of this website. Our privacy notice and procedures for ensuring high levels of data protection are fully compliant with the General Data Protection Regulation (GDPR).

Website users undertake to read this privacy notice together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal data about users, so that you are fully aware as to how, and why we are using your data.

### 1.2 Data controller

CSES is the controller responsible for your personal data. For all data matters contact:

Jan Smit  
Data Protection Officer  
Swerford House  
148 Beaumont Road  
Birmingham  
B30 1NY  
United Kingdom

Tel: +44 0330 111 7670

Email: [jsmit@cses.co.uk](mailto:jsmit@cses.co.uk)

### 1.3 Third-party links outside of our control

This website includes links to third-party websites of our partner organisations. 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 notice of every website you visit.

## **2. Collection of personal data via the website**

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### **2.1 Personal data collected about website users**

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

The only data that is automatically gathered about website users is the IP address and location (if available) of the user, their web domain (if a corporate or public sector organisation) and which page within the CSES website that they have visited. Other than the IP address, the data is anonymous and no personal data relating to the individual in question is gathered.

Aggregated data may be derived from data about individual users' IP addresses. However, this is not considered to be personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your data usage to calculate the percentage of users accessing a specific website feature.

In addition, website users may choose to provide an email address using the text box at the foot of each page on the website ("Sign up for the newsletter").

### **2.2 How we collect website users' personal data**

The only data that is automatically gathered about website users is generated automatically by an analytics tool provided by our website provider (Squarespace) when someone visits [www.cses.co.uk](http://www.cses.co.uk), to collect standard internet log information and details of visitor behaviour patterns. We do this to find out the number of visitors to the various parts of our website. This data is only used for internal analytical purposes and key metrics are presented in aggregate.

Data are only processed in a way which does not identify individual persons. We do not make, and do not allow Squarespace or other analytical tools such as Google Analytics to make any attempt to find out the identities of those visiting our website.

### **2.3 Cookies and Cookie Policy**

In order to collect certain basic information useful for analytical purposes on our users, Squarespace, our website provider, collects basic data on website users using cookies. As explained above, the only data collected is the IP address and location of the IP rather than data about individual users. This information is analysed in aggregate only, and only for legitimate internal purposes. It is not shared with any other third party.

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.

## **3. Use of personal data of website users**

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### **3.1 Purpose of using data**

We will only use personal data when the law allows us to do so. Most commonly, we will only use your personal data where there is a legitimate interest or in order to comply with a legal or regulatory obligation.

### **3.2 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 lawful and compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Data Protection Officer ([jsmit@cses.co.uk](mailto:jsmit@cses.co.uk)).

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.

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.

### **3.3 Sharing of data of website users**

Data on website users is shared only with our website provider (Squarespace).

### **3.4 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 who are involved in maintaining the website (currently only CSES and Squarespace).

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.

#### **3.4.1 Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. Data may also need to be retained for the purposes of satisfying any legal, accounting, or auditing 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 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 requirements.

In some circumstances you can ask us to delete your data: see the next section on **“Your legal rights”** below for further information.

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## 4. Legal information

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### 4.1 Your legal rights

Unless subject to an exemption under the relevant data protection laws, under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact [jsmit@cses.co.uk](mailto:jsmit@cses.co.uk)

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 admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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.

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

### 4.2 Changes to this notice and your duty to inform us of changes

This version was published on 26 January 2022. This version will be available when further updates are made, and earlier versions will be made available on request by contacting us.

### 4.3 Queries, requests or concerns

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Protection Officer [jsmit@cses.co.uk](mailto:jsmit@cses.co.uk).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.