

Privacy Policy for PHE's Radon Services

October 2018

INTRODUCTION

1. Welcome to Public Health England's ("PHE") privacy policy. PHE is an executive agency of the Department of Health and Social Care with operational autonomy. PHE provides the government, local government, the NHS, Parliament, industry and the public with evidence-based professional, scientific expertise and support.
2. PHE respects your privacy and is committed to protecting your personal data. This privacy policy should be read in conjunction with our generic privacy policy which can be found at <https://www.phe-protectionservices.org.uk/tc/privacy-policy>. The generic privacy policy provides information on individual's rights regarding their data.
3. This privacy policy specifically sets out the type of personal data that we collect when you use PHE's Radon Services and what we do with your personal data.

CONTROLLER

4. PHE is the controller and responsible for your personal data (referred to as "we", "us" or "our" in this privacy policy).
5. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights (as defined in the glossary below), please contact the DPO using the details set out below.

CONTACT DETAILS

6. If you have any questions about this privacy policy or our privacy practices, please contact our DPO by emailing or writing:

Email address: dataprotectionofficer@phe.gov.uk

Postal address: Public Accountability Unit
Public Health England
7th Floor North, Wellington House
133-155 Waterloo Road
London SE1 8UG.

7. 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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

8. We keep our privacy policy under regular review. This version was last updated in October 2018. Historic versions can be obtained by contacting us.

9. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THE DATA WE COLLECT ABOUT YOU

10. 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).
11. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
 - **Identity Data** includes your name, billing address, email address and telephone numbers.
 - **Financial Data** includes payment and/or card details and payments that you have made.
 - **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, other technology on the devices you use to access this website and information about how you use our website.
 - **Radon Data** includes the radon measurements that we have made in the addresses that you have given us (whether residential or commercial premises). For residential properties, this also includes information provided by you as part of the questionnaire that we ask you to complete such as construction and use of the property, demographic information relevant to the property, and details of radon remediation work carried out to the property.
 - **Enquiries Data** which includes enquiries made by you by telephone, email, post and through our website and our responses to your enquiries.
12. We also collect, use and share Aggregated Data such as statistical or demographic data. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Technical Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.
13. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

14. Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

15. We use different methods to collect data from and about you including through:
 - **Direct interactions.** You may give us your Identity, Radon and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when

you apply for our products or services, create an account on our website; subscribe to our service or publications; request marketing to be sent to you; or give us feedback or contact us.

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy <https://www.phe-protectionservices.org.uk/tc/cookies> for further details.

HOW WE USE YOUR PERSONAL DATA

16. We use your personal data to provide radon services to you under contract and to support us in our public health duty to protect the population from radon exposure. This information is kept and destroyed in accordance with the PHE data retention schedule.
17. We undertake scientific research to improve our understanding of a range of factors that affect radon exposure.
18. The Radon Data, and in particular the results of radon measurements make up the National Radon Database (NRD) (please see the Glossary for further details on the NRD). The NRD is used to improve the radon map of the United Kingdom. The radon map identifies Radon Affected Areas (those in which at least 1% of dwellings are expected to exceed the radon Action Level and in which radon testing is advised) and areas which lie in bands of higher radon probability. The radon map does not contain information about radon levels measured in individual properties.
19. We will only use your personal data when the law allows us to. Most commonly, we rely on your consent as a legal basis for processing your personal data. You have the right to withdraw consent to at any time by contacting us. In addition, we also rely on the legal bases set out in the table below. Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you as a new customer, process and deliver your order, manage our relationship with you, to administer and protect our business including this website, to use data analytics to improve our website, products/services, customer relationships and experiences and to invite you to our annual UK Radon Forum event.	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to recover debts due to us).
National Radon Database (NRD)	(a) Processing is necessary for compliance with a legal obligation on us (National Health Service Act s.2A (health protection) and s.2B (health prevention)).

- (b) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
- (c) Processing is necessary for the purposes of legitimate interests pursued by us.

20. The information in the NRD is used as follows:

- Working with the British Geological Survey (BGS), to prepare maps of radon risk, with respect to levels of radon in domestic properties. This work is carried out using a methodology that does not require or involve BGS receiving information that could be used to identify the measured radon level in a given property.
- To support public health research projects including projects investigating the factors that influence radon exposures (which allows PHE to generate evidence-based advice on radon). If research projects are carried out with other research partners, we do not share the details about radon measurements in individual identifiable properties, unless we specifically have agreement from you to do so.

For statistical summaries of the radon measurements we have made in domestic properties. Information is presented for aggregated geographical units, such as postcode or administrative areas where we have information for at least 5 properties. This statistical summary is published by us.

CHANGE OF PURPOSE

21. 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 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 us.
22. 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 and/or obtain your consent.
23. 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.

DISCLOSURES OF YOUR PERSONAL DATA

24. We do not share your personal data with any third parties unless we have your specific consent to do so.
25. We do not transfer your personal data outside the European Economic Area (EEA).

8. DATA RETENTION

26. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. Please contact us if you wish to discuss this further or wish to see a copy of our retention policy.