

# Road Safety Education & Training Privacy Notice

This privacy notice sets out how West Berkshire District Council (the “**Council**”) will use your personal data, and your rights in relation to that personal data. This document describes how and why we collect, store, protect, process and share the data you give to us. It is written in accordance with the UK data protection legislation.

This notice relates to personal data collected under Road Safety surveys and related booking platforms associated with booking road safety training. We will use this information to improve our understanding and delivery of Road Safety services in West Berkshire

This notice applies to potential, current and former customers of the service and those we have contacted but have opted not to partake in the service. It is important that you read this notice so that you know how and why we use information about you. It is also important that you inform us of any changes to your personal information so that the information which we hold is accurate and current.

Date of Issue: 12/11/2024

Update History:

|                  |                                     |
|------------------|-------------------------------------|
| <i>Version 1</i> | First issue of a new Privacy Notice |
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Directorate: Environment  
Service: Highways  
Team: Traffic & Road Safety

## About the Organisation

The Council is the Data Controller. This means it is ultimately responsible for the data it holds about you.

Contact Address:

West Berkshire District Council  
Market Street  
Newbury  
Berkshire  
RG14 5LD

ICO Registration Number: **Z6825178**  
<https://ico.org.uk/ESDWebPages/Entry/Z6825178>

## The Data Protection Officer

Contact details for the Data Protection Officer at the Council can be found at:  
[www.westberks.gov.uk/dpofficer](http://www.westberks.gov.uk/dpofficer)

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## THE PERSONAL DATA WE HOLD ABOUT YOU

We will process the following personal data about you:

- Name
- Contact details (email or phone)
- Address (including postcode)
- Organisation name (School, business etc)
- Role in organisation
- Training requirements
- Qualifications or training certificate
- Age and or Date of Birth

We may process the following special category data about you:

- Ethnicity
- Medical or SEND details if applicable
- Any other 'protected characteristic' defined in the Equality Act 2010 - <https://www.equalityhumanrights.com/en/equality-act>)

These details are collected and held on the councils electronic systems and will be protected using up-to-date technical and organisational security measures.

We collect and use information to ensure eligibility for participating in road safety education or training activities, such as verifying residency in West Berkshire or confirming age suitability for specific programs. This data collection also supports the Council's statutory duty under the Road Traffic Act 1988 to improve road safety and reduce highway injuries. It allows us to make informed, evidence-based decisions, supporting a range of road safety initiatives—from educational and training programs to engineering measures that enhance safety across the district.

We often use SurveyMonkey (Momentive), managed by our PRR team, to collect responses during consultations or engagement activities. Upon survey completion, the data is securely downloaded and shared with the relevant Council officers overseeing the exercise. SurveyMonkey's (Momentive) privacy policy and security measures, which we adhere to, are available here:

- <https://www.surveymonkey.com/mp/policy/privacy-policy/>
- <https://www.surveymonkey.com/mp/policy/security>

## SOURCE OF YOUR PERSONAL DATA

We collect the above information about you from the data you enter when you request training or complete feedback surveys relating to road safety training and education that will or has been delivered.

## PURPOSE AND LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

In accordance with the data protection laws, we need a "legal basis" for collecting and using information about you. There are a variety of different legal bases for using personal data which are set out in the data protection laws.

We have set out below the different purposes for which we collect and use your personal data, along with the legal basis we rely on to do so.

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| Why we use your information  | Our legal basis for using your information  |
|--|---|
| <p>We will use your data in the vital role in shaping and enhancing road safety education and training initiatives. This data also supports our efforts to secure funding from central government bodies, helping to bridge gaps in current safety provisions.</p> <p>As part of the Bikeability Trust and Department for Transport equality duties we will also share anonymised data which may include special category data, namely, gender, ethnicity, pupil premium and SEND with those entities.</p> <p>Where a service or information request requires you to submit further personal information, a separate privacy notice will describe how we will use that data.</p> | <p><b>Public Task:</b> Article 6(1)(e) of the GDPR namely the processing is necessary for the performance of a task carried out in the public interest.</p> <p>For the limited special category data that the Council is processing the Council is relying on Article 9(2)(a) of the UK GDPR namely explicit consent to process your personal data as set out in this notice.</p> |

## SHARING YOUR PERSONAL DATA

Your data will be seen by employees of the Council relevant to the service or information request you have made.

Where a service or information request requires us to share your data with other parties, a separate privacy notice will describe who that is.

We may share your personal data with third parties where it is necessary for the delivery of the service or training provision ie contracted services and the Department for Transport.

We may also share your data if we are required to do so by law, for example by court order or to prevent fraud or other crime.

## RETAINING YOUR PERSONAL DATA

Your personal data will not be kept longer than necessary.

We sometimes use an online survey tool called Survey Monkey (Momentive) to collect your responses to a consultation or engagement exercise. Data collected in this way will be deleted from Survey Monkey within 90 days after the responses have been downloaded. Once deleted the data is no longer accessible by us via Survey Monkey and is no longer available to Survey Monkey. The deleted data is then permanently removed from the Momentive system by the provider within 60 days. Some residual copies of deleted data may remain on backup media up to 90 days after the deletion has occurred, at which point it will be overwritten.

The downloaded data may also be held on the Council's secure electronic systems by the Council officer(s) responsible for the consultation.

You can check how long the Council will keep each type of data against our retention schedule ([www.westberks.gov.uk/retention](http://www.westberks.gov.uk/retention)).

## YOUR RIGHTS

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Withdraw consent** to the processing of your personal data at any time, where processing is based on your consent. To withdraw your consent, please contact our Data Protection Officer using the contact details below. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## HOW TO MAKE A REQUEST

If you wish to make a request associated with any of the rights listed above, contact the Council using the contact details at the top of this notice.

## INTERNATIONAL TRANSFERS

As an international company Momentive have data centres in the United States, Canada, and Ireland (EU). Your response to a consultation or engagement exercise, collected via

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Survey Monkey (Momentive) is held in their EU data centre in Ireland. Please see <https://help.surveymonkey.com/en/policy/surveymonkey-data/>) for more information.

All data held directly by the Council will be processed within the UK.

## **COMPLAINTS**

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an independent regulator. Further information can be found at: <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>

The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

## **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

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