

5-7 Alexandra Road  
Hemel Hempstead  
Herts HP2 5BS. UK

Tel: 44 (0)1442 242200  
Fax: 44 (0)1442 214077  
business@bpa.co.uk  
www.bpa.co.uk



Last updated  
7<sup>th</sup> September 2018

## British Pipeline Agency Privacy Notice

British Pipeline Agency Limited ("BPA", "us", "ours") respects your privacy and is committed to protecting it. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Notice only applies to:

- personal information that we collect through our websites at [www.bpa.co.uk](http://www.bpa.co.uk) and [www.knowwhatsbelow.co.uk](http://www.knowwhatsbelow.co.uk) ("**Websites**");
- information we collect about our clients and about landowners who we work with to deliver our pipeline services; and
- visitors to our premises who may be recorded on CCTV.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

### Quick links

We recommend that you read this Privacy Notice in full to ensure you are fully informed. However, if you only want to access a particular section of this Privacy Notice, then you can click on the relevant link below to jump to that section.

- [What personal information does BPA collect and why?](#)
- [Who does BPA share my personal information with?](#)
- [Legal basis for processing personal information](#)
- [How does BPA keep my personal information secure?](#)
- [International data transfers](#)
- [Data retention](#)
- [Your data protection rights](#)
- [Updates to this Privacy Notice](#)
- [How to contact us](#)

### What personal information does BPA collect and why?

The personal information that we may collect about you broadly falls into the following categories:

#### If you are a visitor to our Websites

Certain parts of our Websites may ask you to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to contact you. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

When you visit our Websites, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws. Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Websites, including the pages accessed and links clicked. Collecting this information enables us to better understand the visitors who come to our Websites, where they come from, and what content on our Websites is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Websites to our visitors. To stop cookies being placed on your equipment please refer to your specific internet browser for instructions. Cookies are small pieces of information that are stored on your computer by the server maintaining and operating the Websites. They do not compromise your privacy or security as they store a randomly generated identifying tag on your computer. We save cookies on to your computer to enable our site to personalise your future visits. Based on your interests the information helps speed up navigation to help you find the information you are looking for.

5-7 Alexandra Road  
Hemel Hempstead  
Herts HP2 5BS. UK

Tel: 44 (0)1442 242200  
Fax: 44 (0)1442 214077  
business@bpa.co.uk  
www.bpa.co.uk



#### If you are or work for a client of BPA

In order to provide our services to our clients, we collect business contact details including name, email address, postal address, phone number and job title. From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

#### If you are a landowner

In order to enter into agreements with you and to maintain the safety and integrity of our pipelines which cross your land, we collect the following information from you: your contact details including your name, email address, postal address and details about your land.

From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

#### If you are a visitor to BPA premises

In order to maintain the safety of visitors to premises at which BPA operates and to the security of our operations, visual recordings of you may be taken through the use of CCTV. If this occurs you will be made aware of this through appropriate signage.

#### **Who does BPA share my personal information with?**

We may disclose your personal information to the following categories of recipients:

- to our **group companies, third party services providers and partners** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Websites), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information.
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an actual or **potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any **other person with your consent** to the disclosure.

#### **Legal basis for processing personal information**

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally process personal information from you only:

- where we need the personal information to perform a contract with you, for example where you are a client or landowner;
- where the processing is in our legitimate interests and not overridden by your rights, for example in order to improve our Websites and the service we provide, to provide services to a client (your employer), to respond to your queries, improve our platform and undertake marketing, or for the purposes of detecting or preventing illegal activities (including through the use of CCTV);
- where we have a legal obligation to collect personal information from you, such as under Regulation 16 of the Pipelines Safety Regulations 1996;
- where we may otherwise need the personal information to protect your vital interests or those of another person, particular in relation to ensuring the safety of those who are in the vicinity of our pipelines; or
- where we have your consent to do so.

If we ask you to provide personal information to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision

5-7 Alexandra Road  
Hemel Hempstead  
Herts HP2 5BS. UK

Tel: 44 (0)1442 242200  
Fax: 44 (0)1442 214077  
business@bpa.co.uk  
www.bpa.co.uk



of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "[How to contact us](#)" heading below.

#### **How does BPA keep my personal information secure?**

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. CCTV recordings are kept secure and are only available to a limited number of authorised persons on a need-to-know basis.

#### **International data transfers**

As a UK company, all of the personal data we process is stored in our files and servers located in the United Kingdom.

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information to countries outside the European Economic Area. Copies of the Standard Contractual Clauses can be provided on request.

#### **Data retention**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

CCTV recordings are retained for a maximum period of 30 days, unless retained for longer for a specific investigation (in which case the recordings will be deleted on completion of the investigation) or unless disclosed to law enforcement.

#### **Your data protection rights**

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the "[How to contact us](#)" heading below.
- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "[How to contact us](#)" heading below.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "[How to contact us](#)" heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not

5-7 Alexandra Road  
Hemel Hempstead  
Herts HP2 5BS. UK

Tel: 44 (0)1442 242200  
Fax: 44 (0)1442 214077  
business@bpa.co.uk  
www.bpa.co.uk



affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- You have the **right to complain to a data protection authority** about our collection and use of your personal information.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

#### **Updates to this Privacy Notice**

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

#### **How to contact us**

If you have any questions or concerns about our use of your personal information, please contact us using the following details:

5-7 Alexandra Road, Hemel Hempstead, Herts, HP2 5BS, United Kingdom  
+44 (0)1442 242200  
datacontroller@bpa.co.uk

The data controller of your personal information is British Pipeline Agency Limited.