

## SHIFT Privacy Policy

### 1. Introduction

SHIFT is co- managed by the London Legacy Development Corporation (“the LLDC”). It is the LLDC which is the controller for any personal data which is being processed for the purposes of SHIFT. Therefore, this Privacy Notice throughout references the LLDC rather than SHIFT.

This Privacy Notice describes the types of personal data which the LLDC may process about you in relation to SHIFT what the lawful basis is and how your personal data will be used.

It also sets out your rights as the data subject and how to contact the LLDC if you have any questions.

The LLDC is committed to protecting your privacy and processing your personal data so that it is secure and safe, and to prevent loss, theft, and unauthorised use and to ensure compliance with data protection legislation.

### 2. Who is the responsible controller?

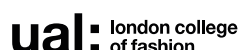
LLDC are the controller for your personal data for the purposes of SHIFT.

### 3. Why Personal Data is Being Collected

Personal data may be collected by SHIFT for a number of reasons:

- To tell you about projects, events and opportunities you may be interested in as part of SHIFT
- Announcements about new partners at SHIFT
- Highlight news stories about SHIFT
- To process innovation trial applications
- Where necessary, to gather your consent to send you relevant marketing.
- When you contact us directly, including to deal with any requests, comments, and complaints that you have.
- To help us get feedback on SHIFT projects and activities
- To be able to analyse our marketing and communications and your interactions with us – including website use – to enhance the user’s experience.
- We may anonymise your personal data for statistical and analysis purposes.
- We may use personal data to build a customer profile to get a better understanding of what you are interested in, what you like or dislike about SHIFT so that we can send you more relevant marketing. This is known as profiling.

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#### 4. What Personal Data is Being Collected

<b>Contact Data</b>	Your name, address, company name, email address and telephone number
<b>Demographic Data</b>	Your age range, gender, where you live, how far you travelled to the Park,
<b>Innovation trial data</b>	Information on the project that you wish to trial at Queen Elizabeth Olympic Park as part of SHIFT
<b>Preference Data</b>	Your preferences as to how we are able to contact you, including where you have provided us with or withdrawn consent, and your preferences on the content you may wish to see
<b>Engagement Data</b>	Facebook and custom audience, how you engage with our websites and marketing emails

This is known as **Customer Personal Data**.

Some of the data that will be collected as part of your interactions with us is anonymous and therefore is not personal data.

#### 5. Lawful Basis of the Data Collection

The lawful basis for the processing of Customer Personal Data is covered by Article 6 (1) and Article 9 (2) of the UK General Data Protection Regulation (GDPR).

Lawful Basis	Personal Data Processed	Purpose
You have provided your <b>Consent</b>	<ul style="list-style-type: none"> <li>Contact Data</li> <li>Engagement Data</li> </ul>	<ul style="list-style-type: none"> <li>Where necessary, to gather your consent to send you relevant marketing.</li> <li>To be able to analyse our marketing and communications</li> </ul>

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		<p>and your interactions with us— including website use – to enhance the user’s experience</p> <ul style="list-style-type: none"> <li>• We may use personal data to build a customer profile to get a better understanding of what you are interested in, what you like or dislike about the SHIFT so that we can send you more relevant marketing. This is known as profiling.</li> </ul>
<p>The processing is necessary for the purpose of our <b>Legitimate Interests</b> or the Legitimate Interests of a third party</p>	<ul style="list-style-type: none"> <li>• Contact Data</li> <li>• Engagement Data</li> </ul>	<ul style="list-style-type: none"> <li>• To tell you about projects, events and opportunities you may be interested in as part of SHIFT</li> <li>• Announcements about new partners at SHIFT</li> <li>• Highlight news stories about SHIFT</li> <li>• When you contact us directly, including to deal with any requests, comments, and complaints that you have</li> <li>• To be able to analyse our marketing and communications and your interactions with us— including website use – to enhance the user’s experience</li> <li>• We may anonymise your personal data for statistical and analysis purposes</li> <li>• We may use personal data to build a customer profile to get a better understanding of what you are interested in, what you like or dislike about the SHIFT so that we can send you more relevant marketing. This is known as profiling.</li> <li>• Where we undergo a sale or reorganisation of part of our operations.</li> <li>• Where we seek professional advice from our chosen</li> </ul>

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		advisors in respect of any issues, enquiries or claims you make raise with us.
The processing is necessary to <b>enter into or perform a Contract</b> with you	<ul style="list-style-type: none"> <li>• Contact Data</li> <li>• Innovation trial data</li> </ul>	<ul style="list-style-type: none"> <li>• When you contact us directly, including to deal with any requests, comments, and complaints that you have relating to contractual terms you have in place with us.</li> <li>• Information on the project that you wish to trial at Queen Elizabeth Olympic Park as part of SHIFT</li> </ul>
The processing is necessary for compliance with our <b>Legal Obligations</b>	<ul style="list-style-type: none"> <li>• Contact Data</li> <li>• Preference Data</li> <li>• Engagement Data</li> </ul>	<ul style="list-style-type: none"> <li>• Where we are legally required (including by court order) to share your personal information.</li> </ul>

### 6. How Your Personal Data Will Be Collected

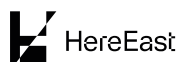
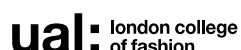
We collect your personal data in a variety of different ways, including when you:

- Sign up to receive communications on our SHIFT website.
- Complete the innovation trial application form on the SHIFT website
- Use one of our websites, by the use of cookies in your web browser.
- Contact us directly.
- Verbally tell our staff you wish to receive communications.
- Engage with us on social media.
- Choose to complete any surveys we send you

### 7. Storage and Management of Your Personal Data

All of your personal data which is held in digital systems will be held in the UK or the European Economic Area (EEA).

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Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

We will retain your personal data whilst you continue to interact with the us. Where that is no longer the case, we will retain your personal data for up to 3 years subject to the data type unless otherwise specified. At the end of that retention period, your data will either be permanently deleted or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

## 8. Potential Sharing of Personal Data

We will share your personal data with third parties where we have a lawful basis to do so, including the following:

- Our services providers, including our data processors acting in an accordance with our instructions
- Direct marketing and data insight companies who help us manage our communications with you
- Companies or organisations that we partner with, to help us run innovation trials on the Park
- Our professional advisors, including our legal advisors, accountants
- Regulatory or government bodies where we there is a valid request to do so
- In the event of a sale of all or part of the Park (or Park assets) we may share personal data with prospective buyers

Your personal data will not be sold to third party firms for the purposes of general marketing or any other purpose.

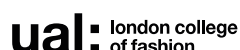
If there are lawful requests made by organisations such as the police or other law enforcement agencies or requests that we are legally required to comply with then we will respond to them where we are able to do so.

## 9. Access to Your Personal Data and Your Rights

Data protection law gives you rights in relation to your own data. These are outlined below, but please be aware that these are not necessarily automatic rights. There is a 'right to be forgotten' in general, but in practice, there are other considerations which may mean that all personal data cannot be deleted

**Right to privacy** – your data will not be shared with third parties without your consent, unless there is a legal reason to do so, or an event such as a medical emergency.

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**Right of access** – you can ask for details of the personal data which is held about you

**Right to rectification** – you can ask that data is corrected, if need be, and if it is incomplete, to be completed

**Right of erasure (right to be forgotten)** – you can ask that data is deleted and no longer processed if it is no longer necessary to do so. This will be done where possible but there will be instances where personal data cannot be deleted for example, for legal or other reasons

**Right to restriction on processing** – you can ask that data is not processed

**Right to data portability** – you can request a portable version of your personal data

**Right to withdraw consent** – if you have consented to provide personal data – for example, consent for biometric data to be processed, then you can withdraw that consent.

If you would like to submit a request to access your personal data or any other individual rights, please contact [dataprotection@londonlegacy.co.uk](mailto:dataprotection@londonlegacy.co.uk).

## 10. Changes to the Privacy Policy

This Privacy Policy may change over time. If there are any significant changes then you will be contacted to inform you. No changes to this policy will be made which will adversely affect your rights as a data subject.

## 11. Contact Details

If you have any questions about your personal data, or this Privacy Policy, please contact:

[dataprotection@londonlegacy.co.uk](mailto:dataprotection@londonlegacy.co.uk)  
London Legacy Development Corporation  
Level 9  
5 Endeavour Square  
London  
E20

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