



# PRIVACY NOTICE

## Introduction

Your privacy is important to us. This privacy notice sets out how we'll protect your data, in line with the current legislation, through appropriate organisation and technical security measures and processes. It also describes your rights in relation to that data.

We reserve the right to make changes to this notice as necessary. When we do so we will make previous versions available on request so you can see what these changes are. If any such changes alter key aspects of the notice or its meaning we will notify you of those changes in advance.

**Data protection law compliance. This says that the personal data we hold about you must be:**

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure

## Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be directly using the data itself or by combining it with other information which helps to identify a living individual (e.g. a list of staff may contain personnel ID numbers rather than names but if you use a separate list of the ID numbers which give the corresponding names to identify the staff in the first list then the first list will also be treated as personal data). The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR) and other legislation relating to personal data and rights such as the Human Rights Act.

## Who are we?

This Privacy Notice is provided to you by the Englefield Estate Trust Corporation Limited, its subsidiaries or subsidiary undertakings from time to time, including De Beauvoir Block,

Englefield Home Farms and Englefield Estate LP, hereinafter referred to as “The Englefield Estate” or “The Estate”. The Estate is the data controller for your data.

### **The types of information we collect**

We may collect the following information:

- Names, titles, and photographic ID;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to the services provided by the Estate or where you provide them to us, we may process information such as gender, date of birth, national insurance number, marital status, employer, and dependants;
- Supplier information in respect of our purchase to pay process

### **How we collect personal data**

You can give us your personal data in a number of ways. For example:

- When you become or apply to become a tenant
- When you become a customer or do business with us
- When you make contact with us through our website
- When you call the Estate office and talk to us on the telephone
- When you become a supplier or prospective supplier
- If you apply for a job

We do not source personal data from third parties and when we collect data from you we will ensure it is adequate for the purpose and never excessive.

### **How we use your personal data**

We require this information to provide the service you have requested or for other closely related purposes and in particular for the following reasons:

- To enable you to pay your rent, report a repair or apply for a job on-line
- To enable us comply with any repairs and maintenance obligations within a tenancy agreement
- To enable us to comply with our legal obligations such as gas and electrical safety inspections and energy performance certificate requirements
- To perform credit checks as part of a tenancy application or before doing business with you
- To contact you about a submission you have made to the website
- For internal record keeping
- Management reporting and business planning - we produce internal documents in order to monitor our own activities
- For other legitimate business purposes
- To keep you updated on the activities of the Estate

- From time to time, we may also use your information to contact you for market research purposes, e.g. to obtain feedback about the service you have received. We may contact you by email, phone or post
- You may opt-out of receiving Estate updates and other information, such as surveys from us or our partners at any time by writing to us at the contact address on our website or by emailing us at [privacy@englefield.co.uk](mailto:privacy@englefield.co.uk).
- Disclosures required by law - the law can require the disclosure of information for various reasons, in such circumstances the Estate must comply with those requests

### **What is the lawful basis for processing your personal data?**

We may process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with your tenancy agreement and performing necessary property repairs. Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

### **Who we share your personal information with**

In the course of business, the Estate may share information with carefully selected organisations we engage with to provide certain services or to meet our legal obligations. These include:

- External contractors who perform repairs, maintenance, gas and electrical safety inspections, assessments for Energy Performance Certificates
- Solicitors advising on tenancy agreements
- Accountants and tax advisers as required in preparing year end accounts and tax returns
- The Estate's selected marketing and public relations organisations
- Credit reference agencies
- HMRC, fraud protection agencies and the police
- Data storage services, including cloud storage and data management
- Financial organisations such as banks and building societies
- Mandatory legal disclosures

### **Sending data outside the EEA**

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data, for example photographs, may be accessed from overseas.

### **How long do we keep your personal data?**

In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed. We may keep some personal data for an extended

period of time. For example, tax obligations may mean it is necessary to retain some information for 20 or more years.

### **Your rights and your personal data**

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

**1) The right to access personal data we hold on you**

- At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month.
- There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.

**2) The right to correct and update the personal data we hold on you**

- If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

**3) The right to have your personal data erased**

- If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.
- When we receive your request we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).

**4) The right to object to processing of your personal data or to restrict it to certain purposes only**

- You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.

**5) The right to data portability**

- You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

**6) The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained**

- You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).

**7) The right to lodge a complaint with the Information Commissioner's Office.**

- You can contact the Information Commissioners Office on 0303 123 1113 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.

**Cookies and other forms of online tracking**

When visiting our website, we may use features which collect your IP address and data on which pages you are visiting on our site. We may also issue cookies to enable certain features to function properly, track traffic on our website or improve user experience in other ways. Cookies place certain information on your device to allow this to happen. For up-to-date information on this, please refer to the Estate's cookie policy posted on the website.

**Changes to this notice**

We keep this Privacy Notice under regular review and we will place any updates on this web page. This Notice was last updated in April 2018.

**Contact**

If you have any questions regarding this statement or you wish to discuss your data, you can contact the Estate's Data Protection Representative at [privacy@englefield.co.uk](mailto:privacy@englefield.co.uk) or by writing to:

Paul Finegan  
Englefield Estate Office  
Englefield Road  
Theale  
Berkshire  
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