

PRIVACY NOTICE

1 INTRODUCTION

- 1.1 This privacy policy sets out how Cyclops Wharf Residents Company Limited (registered company number 02137443) with its registered office at 5 Fleet Place, London EC4M 7RD (the “**Company**” or “**we**” or “**us**”) processes the personal information of tenants of properties managed by the Company and any other personal information received by the Company. Please note that this privacy policy is not an exclusive description of how we process the personal information of individuals.
- 1.2 If you have any questions about this privacy policy, please contact us by email at GDPR@parcproperties.co.uk or in writing to Data Controller, Cyclops Wharf Residents Company Limited, c/o Parc Properties Management Ltd., 8 Cumbrian House, 217 Marsh Wall, London, E14 9FJ.

2 HOW WE COLLECT PERSONAL INFORMATION

- 2.1 The Company collects personal information directly from the individual to whom it relates, Notice of Transfer post purchase of property in the development managed by us, from the Land Registry, buyer's solicitors undertaking the conveyancing related to purchase of the property in the development and from third parties including Estate Agents.
- 2.2 We will collect and store personal information when you, request our services, or otherwise correspond with us. We collect personal information in writing, by telephone, by e-mail.

3 WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU

- 3.1 Personal information means any information relating to a person that enables them to be identified either directly or indirectly. Personal information that we hold about you includes your:
- 3.1.1 name;
 - 3.1.2 address;
 - 3.1.3 email address;
 - 3.1.4 phone number;
 - 3.1.5 service address;
 - 3.1.6 details of tenancy agreement as Landlord or Tenant;
 - 3.1.7 details of agent managing your property;
 - 3.1.8 from your Lease;
 - 3.1.9 from your transfer document;

- 3.1.10 CCTV images of you, where development is equipped with such
- 3.2 We will take reasonable steps to ensure the personal information that we store is accurate, complete and up-to-date.

4 **HOW WE USE YOUR PERSONAL INFORMATION**

- 4.1 We will use your personal data, and may share your personal data with other parties acting on our behalf, for one or more of the following purposes:
 - 4.1.1 providing our services to you in accordance with your lease provisions;
 - 4.1.2 handling and fulfilling covenants within your lease;
 - 4.1.3 obtaining rent and other charges all as per the provisions within your lease;
 - 4.1.4 resolving any disputes if you lawfully exercise your rights;
 - 4.1.5 resolving disputes when you are not compliant with the provision of your lease
 - 4.1.6 to assess and respond to a complaint you might make to us;
 - 4.1.7 to carry out our duties in compliance with your lease / transfer document;
 - 4.1.8 to conduct investigations of suspicious or harmful activity; and
 - 4.1.9 to comply with the Company's regulatory and legal obligations.
 - 4.1.10 To ensure the security and safety of the development and its residents
- 4.2 We do not sell your personal information to others. If we wish to use your personal information for a purpose beyond that for which it was originally provided, we will ask for your consent or seek to rely on another valid legal ground to process your personal information in accordance with the applicable law.

5 **GROUNDS FOR PROCESSING**

- 5.1 To process your data lawfully we need to rely on one or more valid legal grounds. The grounds we may rely upon include:
 - 5.1.1 because processing your personal data is necessary to ensure our compliance with the lease / transfer document;
 - 5.1.2 our legitimate interests as a management company (except where your interests or fundamental rights override these);
 - 5.1.3 our compliance with a legal obligation to which the Company is subject;
or
 - 5.1.4 where you give us your consent to process your personal data for particular processing activities.

6 DISCLOSURE OF YOUR PERSONAL INFORMATION

6.1 There are circumstances where we may wish to disclose or are compelled to disclose your personal data to third parties. This will only take place in accordance with the applicable law and for the purposes listed above. These scenarios include disclosure:

- 6.1.1 to our outsourced service providers or suppliers to facilitate the provision of our services, for example, to carry out work on the property;
- 6.1.2 to third party service providers and consultants, including our solicitors, insurance companies (including brokers and underwriters, accountants and auditors);
- 6.1.3 to another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event. In the case of a merger or sale, your personal data will be permanently transferred to a successor company;
- 6.1.4 to the freeholder, landlord, or their agents of the property which the Company manages;
- 6.1.5 to legal advisors who may need to manage or litigate a claim;
- 6.1.6 to public authorities where we are required by law to do so; and
- 6.1.7 to any other third party where you have provided your consent.

7 INTERNATIONAL TRANSFER OF PERSONAL DATA

7.1 We may transfer your personal data to a third party in countries outside the European Economic Area in digital format fully encrypted for the purpose of data backup. In particular, Such backup data may be transferred to our outsourced service providers located abroad. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation, contractual or other lawful means. Please contact us for information about the safeguards which we have put in place to protect your personal data and privacy rights in these circumstances.

8 RETENTION OF PERSONAL INFORMATION

8.1 Your personal information will be retained for as long as it is necessary to carry out the purposes set out in this privacy policy (unless longer retention is required by the applicable law). However, we will not retain any of your personal information beyond this period and the retention of your personal information will be subject to periodic review.

8.2 To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of your information, the purposes for which we process it and whether we can achieve those purposes through other means, and the applicable legal requirements.

9 **CONFIDENTIALITY AND SECURITY**

9.1 The Company is committed to:

9.1.1 seeking to safeguard all personal information that you provide to us;

9.1.2 seeking to ensure that it remains confidential and secure; and

9.1.3 taking all reasonable steps to ensure that personal privacy is respected.

9.2 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also have procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9.3 All our data is stored in written or electronic form on our servers and computers and in various physical locations of business. We maintain physical, electronic and procedural safeguards to protect your personal information from misuse, unauthorised access or disclosure and loss or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members, partners, subsidiary companies and third parties who need to know that information for the purposes set out in this privacy policy.

10 **YOUR RIGHTS WITH REGARDS TO YOUR PERSONAL INFORMATION**

10.1 Data protection law provides individuals with certain rights, including the right to: access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of, their personal information. Individuals also have the right to lodge a complaint with the relevant information protection authority if they believe that their personal information is not being processed in accordance with the law. Further information about your rights is set out below:

10.2 **Right of obtain a copy of your personal information.** You have the right to obtain a copy of the personal information we hold about you. If you would like to obtain a copy of this information please email us at GDPR@parcproperties.co.uk. You may be required to submit a proof of your identity.

10.2.1 A copy of your basic personal information listed in 3.1 above is available for disclosure at any time subject to receipt of a Data Subject Access Request ("**DSAR**")

10.2.2 All DSAR received are processed in accordance with our DSAR policy copies of which are available on request.

- 10.3 **Right to rectification.** You may request that we rectify any inaccurate and/or complete any incomplete personal information. If we disagree and believe the information to be accurate and complete, we will advise you and include a notation on the record that you dispute the information's accuracy. Requests for corrections or supplements to all other personal information should be made by email to GDPR@parcproperties.co.uk or in writing to Data Controller Cyclops Wharf Residents Company Limited, c/o Parc Properties Management Ltd., 8 Cumbrian House, 217 Marsh Wall, London, E14 9FJ. We will respond to your request to correct or supplement your personal information within a reasonable time period and, in any event, within any time period specified in relevant laws.
- 10.4 **Right to withdraw consent.** In circumstances where you have given your specific consent in relation to particular data processing activities you may, as permitted by law, withdraw your consent to the processing of your personal information at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent. Please note that if you withdraw your consent, you may not be able to benefit from certain service features for which the processing of your personal information is essential.
- 10.5 **Right to object to processing.** You may, as permitted by law, request that we stop processing your personal information.
- 10.6 **Right to erasure.** You may request that we erase your personal information and we will comply, unless there is a lawful reason for not doing so.
- 10.7 **Your right to lodge a complaint with the supervisory authority.** We suggest that you contact us about any questions or if you have a complaint in relation to how we process your personal information. However, you do have the right to contact the relevant supervisory authority in the relevant country directly. In the United Kingdom this is the Information Commissioners Office <https://ico.org.uk/>.

11 LINKS

Our website provides hyperlinks to websites owned and controlled by others. The Company is not responsible for the privacy practices of any website that it does not own or otherwise control.

12 THIRD PARTIES

Where you submit information on behalf of another person, you confirm that you have made that person aware of how we may collect, use and disclose their information, the reason you have provided it, how they can contact us, the terms of this policy and that, where required, they have consented to such collection, use and disclosure.

13 **CHANGES TO THIS POLICY**

We reserve the right to update this policy at any time, and we will provide you with a new policy 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.

14 **COOKIES**

We do not collect any cookies and have no cookies apps active in our web site. Our Website is a static website and its purpose is provision of information about the Company. Where you provide personal information as part of your request and completion of the info form (if embedded), the information is emailed and no records kept by the website. When material is downloaded from our web