

CHARLECOTE ESTATES LTD - PRIVACY POLICY

Charlecote Estates Ltd takes its obligations under privacy and data protection law very seriously. We are registered with the ICO (Information Commissioner's Office), the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals. Registration number: ZA648014. We follow ICO best practice guidelines with regard to CCTV.

This Privacy Policy is designed to help you understand what personal information we collect, why, how we use it and who we share it with. It also explains the rights you have in connection with your personal information, including how to contact us, or to make a complaint.

Should we ask you to provide any information by which you can be identified when making an e- mail enquiry or visiting our website, or through a relationship with us, you can be assured that it will only be used in accordance with this Privacy Policy.

The Data Protection Officer (DPO) for Charlecote Estates Ltd is James Cleaver Tel: 0345 235 0003 Email: j.cleaver@charlecote.co.uk

Personal data we collect and hold

The personal data that we hold about you will be specific to your relationship with Charlecote Estates and may include some or all of the following:

- name, gender, and title
- address, email and telephone numbers. This could be business and/or private contact details
- information to assist us to verify your identity
- information you provide to us as part of our business services
- information about visits to our website
- information collected as part of recruitment and employment of staff
- in some instances we collect CCTV footage as part of our property management service

How we use personal data

We use your personal information to deliver our business services to you.

We will also occasionally use personal information to tell you about our products and services and maybe to send you a Christmas card, unless you do not wish to receive this information.

We will not share your personal informal with any third party organisations unless

- we are liaising with mutual clients and professionals in order to fulfil our business contract with you as part of our business services
- for legal or regulatory compliance purposes



 our IT support and service providers may access your personal information as a consequence of them providing support to us. However, we only allow our service providers to handle your personal information providing we are satisfied they have appropriate security measures and do not use it for any other purpose

Where your Personal Information is held

Personal information may be held at our offices or in our secure off-site archive store.

We also hold personal information in trusted secure data centres in the UK as a result of web-based business programmes and services.

CCTV images are held in secure locations at the properties where CCTV is in operation.

How long will we keep your personal information

We will only retain your personal information for as long as necessary to:

- fulfil our business contract with you as part of our business services
- respond to any questions, complaints or claims made by you or on your behalf
- show that we have treated you fairly
- satisfying any legal, accounting, insurance or reporting requirements

To determine the appropriate length of time we consider the amount, nature, and sensitivity of your personal information, the potential risk of harm from unauthorised use or disclosure, and the applicable legal, insurance and statutory requirements.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

Your rights with respect to your Personal Information

You have the following rights:

- to request access to your own personal information
- to ask us not to use your personal data for direct marketing
- to request that any inaccurate information is corrected
- to request your information is deleted in certain circumstances
- to request that we stop using your personal information for certain purposes

We will aim to respond to your request within one month once we have assessed how feasible your request is, taking into account the technical capability of any other organisation involved.

If you have a complaint

We hope that we can resolve any query or concern you may raise about our use of your personal information. If you wish to complain about how we have handled your personal information, please contact our Data Protection Officer who will follow the procedure in our Complaints Policy. If you are not satisfied with our response or believe we are processing your personal information unlawfully, you can complain to the ICO. Further information is available on the ICO website https://ico.org.uk/

January 2023