

Privacy Notice for Leaseholders at 23/24 Heathfield Square SW18 where Marston Properties Limited is a Managing Agent

1 The purpose of this notice

This notice tells you what personal data Marston Properties collects about you, why we need it, how we use it and what protections are in place to keep it secure.

It is Marston Properties policy to:

- Process your personal information fairly and in accordance with GDPR law
- Tell you about how we will use your personal information
- Only collect personal information from you when we need it for legitimate purposes, or legal reasons
- Ensure that personal information held is relevant and not excessive for the purpose for which it is obtained
- Not keep your personal information for longer than we need to
- Keep your personal information secure, and limit the people who can access it
- Ensure that you know how to access your personal information and exercise your rights in relation to it, including being able to keep it accurate and up-to-date
- Ensure that any third parties we share your personal information with take appropriate steps to protect it.

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. For the purpose of the legislation and your personal data, Marston Properties Limited is the Data Controller and the Directors can be contacted at 1 Mills Yard, Fulham London SW6 3AQ.

2 Collecting your personal data

Marston Properties collects and processes personal data relating to its leaseholders for which it is a managing agent. The organisation is committed to being transparent about how it collects and uses that data.

There are 6 lawful bases of processing your data being consent, a legitimate interest, contract fulfilment, a legal obligation, public interest and a vital interest. For each usage of the data the lawful basis of the processing of your data will be identified below. A legitimate interest is when we have a business or commercial reason to process your personal data which needs to be balanced with your interests i.e. what is right and best for you.

| Requirements | Data held includes | Legal Basis |
|---|--|---|
| Information to contact/correspond with you regarding the management of the property, the share of freehold interest or your shareholding in 23/24 Heathfield Square Ltd | Personal telephone numbers, email addresses | Contract Fulfilment |
| Information to process transactions and raise demands e.g. service charges | address, email address | Contract fulfilment |
| Information to maintain the share register | Name, address, shareholding | Legal Obligation |
| Information to identify you if you become a director of 23/24 Heathfield Square Ltd | Name, DOB, address, passport | Legitimate Interest to identify persons Directors and satisfy bank requirements for the Common Reporting Standard |
| Information about your suitability to be a director | Disclosure and Barring Service Reports (Criminal records data) | Consent |
| Information to process and report to HMRC /Companies House/ other legislative requirements | Shareholdings, Names, addresses | Legal Obligation |

3 Using your personal data

Marston Properties needs to process leaseholder data to manage the property, perform duties of company secretary and to comply with current legislation.

Processing leaseholder data enables us to:

- Correspond with you
- Arrange meetings
- Maintain accurate share registers and statutory records
- Manage the properties
- Comply with legal and regulatory obligations

4 Sharing your personal data

Your information will be shared internally with the directors, property management team and authorised employees including the accounts department. Your information may also be shared with The Marston Properties group companies but will only be used in line with this privacy notice.

Marston Properties also shares your relevant data with third party companies that need to process personal data to provide services to us. This includes:

- The officers of 23/24 Heathfield Square Ltd
- Thames Valley Charitable Housing Association
- HMRC and Government bodies
- Companies House
- Insurance advisors and providers
- Professional advisors including auditors and solicitors
- Banks
- Third party IT service providers and software systems
- Confidential Waste Disposal Companies

We will ensure that any third parties we share your personal information with take appropriate steps to protect it.

5 Protecting your personal data

Your hard copy personal data is stored in locked cabinets. Electronic data is stored on servers and on software systems which are local and cloud based. The back-ups are encrypted and stored with a third party. Marston Properties Limited regularly reviews the security of these systems and holds a Cyber Essentials Security Certificate. We have internal policies in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed. This is controlled by only granting access to authorised personnel to fulfil their roles.

Data held by Marston Properties Ltd is stored within the European Union. The information you share with us may be transferred by us or any of the types of firms or organisations we have noted above, to other countries for processing to take place, including locations outside of the UK and the European Union. We will only do so if there are adequate levels of protection in place as required by applicable data protection laws.

6 Keeping your personal data

Marston Properties Limited holds different categories of personal data for different periods of time.

We will keep your personal data for as long as you are a leaseholder or shareholder of 23/24 Heathfield Square Ltd.

After you stop being a leaseholder or shareholder of 23/24 Heathfield Square Ltd, we may keep your data for up to 7 years to maintain records according to rules that apply to us. We may keep your data longer than 7 years if we cannot delete it due to legal, regulatory or technical reasons. Information related to Health and Safety matters may be held for up to 40 years due to the possibility of latent claims under health and safety regulations. Wherever possible we will endeavour to minimise the amount of personal data held and will only use it for those purposes.

7 Cookies and tracking

The Marston Properties website and applications may collect anonymous data about how you use our services to help us improve future functionality.

Marston Properties use Google Analytics, which is a web analysis service provided by Google. No data that personally identifies an individual (such as a name, email address or billing information) is tracked,

collected or uploaded. Marston Properties may collect and report on the adoption and usage of specific features, crashes and exceptions and other useful, anonymous metrics.

8 Your rights

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request
- Require the organisation to update incorrect or incomplete data
- Require erasure of your data when consent is our basis of processing (the right to be forgotten). You may request that your personal data be erased, for example, where there is no compelling reason for its continued processing or where you withdraw consent. We will comply with your request unless we have another basis of processing justifying our retaining the data (for example a legal requirement or the defence of a legal claim).
- Ask the organisation to stop processing data periodically if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.
- Where the lawful basis for processing is your consent, you may withdraw consent at any time by writing to: Noreen Tapp, Marston Properties Ltd, 1 Mills Yard, London SW6 3AQ or emailing nstapp@marstonproperties.co.uk

9. Changes to this privacy notice

We keep our privacy notice under regular review and will post updated versions on our website.