



HAM RIVERSIDE LANDS LIMITED

Registered in England No. 00829987

Registered Address: Suite 225
29 Castle Street
Kingston upon Thames
Surrey KT1 4DT

Telephone: 0208 296 5806
E-mail: admin@hrll.co.uk

Privacy Notice

1. General

- 1.1 Ham Riverside Lands Limited (“we” or “us” or “HRLI”) takes the privacy of your information very seriously. Our Privacy Notice is designed to explain our practices regarding the collection, use and disclosure of personal information about you (or your organisation) that may be provided to us by you personally, by email or telephone communication or collected through other means.
- 1.2 This notice applies to ‘**personal data**’. Personal data means any information relating to an identified or identifiable natural person, who may be identified, directly or indirectly by reference to an identifier such as a name, contact information (e.g. an email address), an identification number, location data, online information (e.g. an IP address) or to one or more factors relating to that person.
- 1.3 This notice applies to personal data provided to us by shareholders in HRLI or lessees, tenants and sub-tenants of properties on the Ham Riverside Lands Estate (the “Estate”), any prospective shareholders in HRLI or prospective lessees, tenants and sub-tenants of properties on the Estate, anyone who contacts HRLI using the contact details provided on our website, and any estate agents, surveyors, suppliers, contractors or other direct or indirect third parties who interact with HRLI in its capacity as freeholder of the Estate. In this notice “you” refers to any individual whose personal data we hold or process, including (where applicable) the personal data of any power of attorney or next of kin of a shareholder in HRLI or lessee, tenant or sub-tenant of a property on the Estate.
- 1.4 This notice is governed by the EU General Data Protection Regulation (the “GDPR”) and the Data Protection Act 2018.

2. Basis on which we process personal data

- 2.1 Personal data we hold about you will be processed either because:
 - 2.1.1 the processing is necessary in pursuit of a “legitimate interest” - a legitimate interest in this context means a valid interest we have or a third party has in processing your personal data which is not overridden by your interests in data privacy and security;
 - 2.1.2 you have consented to the processing for the specific purposes described in this notice; or
 - 2.1.3 the processing is necessary in order for us to comply with our obligations under a contract between you and us.



3. Personal data we collect

3.1 We may collect and process the following personal data (information that can be uniquely identified with you) about you:

3.1.1 contact information we collect from you (for example, your name, address, telephone number, email address) (“Contact Information”);

3.1.2 information provided relating to payment that we may collect or receive (“Payment Information”);

3.1.3 tenant referencing information provided to us by estate agents, solicitors or tenant referencing agents, which may include details relating to your address history, employment history and credit history (“Referencing Information”);

3.1.4 a record and details of any correspondence or communication between you and us or relating to any complaint or other correspondence submitted to us (“Communication Information”).

3.2 We will not collect any sensitive personal data without your prior consent. By sensitive personal data we mean data which falls within certain ‘special categories’ which are defined in the GDPR (e.g. health data) and which require additional protection and consent measures.

3.3 We will collect personal information either from you directly or from a third party. By example:

3.3.1 we may collect Contact Information, Payment Information or Referencing Information from estate agents, tenant referencing suppliers or solicitors, but only when you have provided this information to such third parties;

3.3.2 we may collect your Contact Information from a shareholder in HRLL or a lessee, tenant or sub-tenant of a property on the Estate if you are their power of attorney or next of kin, but only when you have provided this information to such individuals.

3.4 If we do obtain your personal data from a third party your privacy rights under this notice are not affected and you are still able to exercise the rights contained within this notice.

3.5 You do not have to supply any personal information to us but HRLL may not be able to carry out its functions in practice without you providing this personal data to us (particularly if you are or intend to be an owner of a property and/or a resident on the Estate).

4. How we process your personal data

4.1 Please see the table below, which sets out the manner in which we will process the different types of personal data we hold:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
When you update or amend your contact details with us	Contact Information	Necessary for our legitimate interests (to obtain necessary information in order to manage the affairs of the Estate)
When you contact us about becoming a potential lessee, tenant or sub-tenant of a property on the Estate, or about information relating to the Estate	Contact Information Referencing Information	Necessary for our legitimate interests (to obtain necessary information in order to manage the affairs of the Estate)
When you become a lessee, tenant or sub-tenant of a property on the Estate	Contact Information Payment Information Referencing Information	Performance of a contract with you (in circumstances where you have entered into a lease or other form of agreement for occupancy of a property on the Estate) Necessary for our legitimate interests (in managing the affairs of the Estate)
When you provide payment details in order for us to invoice you or send you payments, as applicable	Contact Information Payment Information	Performance of a contract with you (in circumstances where you have entered into a lease or other form of agreement for occupancy of a property on the Estate) Necessary for our legitimate interests (in managing the affairs of the Estate)



<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our privacy notice</p> <p>(b) Sending you updates or guidance about the Scheme of Management and/or applicable covenants</p> <p>(c) Sending relevant information about HRLL business, such as notices of the AGM.</p> <p>(c) When you submit a request or complaint</p>	<p>Contact Information</p> <p>Payment Information</p> <p>Communication Information</p>	<p>Performance of a contract with you (in circumstances where you have entered into a lease or other form of agreement for occupancy of a property on the Estate)</p> <p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (in managing the affairs of the Estate and keeping our records updated)</p>
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5. Data Retention

5.1 Our current data retention policy is to delete or destroy (to the extent we are able to) the personal data we hold about you in accordance with the following guidelines:

Category of personal data	Length of retention
Records relating to (and personal data contained within) leases, licences, ASTs or any other agreements entered into between us and our shareholders, lessees, tenants and/or sub-tenants, and any communications relating to such documents between us and such individuals.	20 years or more from the end of lease, licence, AST or other agreement, if we consider the retention of the relevant information is necessary to record, establish or defend particular rights, obligations or restrictions in respect of a property (or owner or occupier of a property) on the Estate, or the retention is necessary to enable HRLI to satisfactorily perform its functions in managing the affairs of the Estate and serving the best interests of the Estate as a whole.
Records relevant for tax purposes	8 years from the end of the tax year to which the records relate
Personal data processed in relation to a contract between you and us	7 years from either the end of the contract or the date you last used our services, being the length of time following a breach of contract in which a contract party is entitled to make a legal claim

5.2 For any category of personal data not specifically defined in this notice, and unless otherwise specified by applicable law, the required retention period for any personal data will be deemed to be 7 years from the date of receipt by us of that data or (if later) the end of the relevant contract, arrangement or interaction with that person.

5.3 We review the personal data (and the categories of personal data) we are holding on a regular basis to ensure the data we are holding is still relevant to HRLI and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this data as may be required.

5.4 If you wish to request that data we hold about you is amended or deleted, please see clause 8 below, which explains your privacy rights.



6. Sharing your information

6.1 We do not disclose any personal data you provide to any third parties other than as follows:

- 6.1.1 where you have asked us or we are required to share your information with a third party as part of the performance of a contract between us (e.g. a contract for the occupation of a property on the Estate) or as part of our role in managing the affairs of the Estate generally;
- 6.1.2 where HRLL appoints or engages someone on a contractor or consultancy basis to provide services, including administrative services that enable HRLL to carry out its functions in managing the Estate.
- 6.1.3 where necessary in the course of engaging the services of professional advisers (including legal advisers, accountants and estate agents);
- 6.1.4 to certain third party suppliers including maintenance and repair service providers who work on the Estate and may have access to personal data;
- 6.1.5 to certain third party suppliers including technical support providers who may have access to personal data;
- 6.1.6 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime);
- 6.1.7 we may transfer your personal information to a third party as part of a corporate restructuring or reorganisation of HRLL, but we will take steps with the aim of ensuring that your privacy rights continue to be protected;
- 6.1.8 to protect our rights, property and safety, or the rights, property and safety of individuals living on the Estate or any other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.



6.2 Other than as set out above, we shall not disclose any of your personal information unless you give us permission to do so. If we do supply your personal information to a third party we will take steps to ensure that your privacy rights are protected and that third party complies with the terms of this notice.

7. Security

7.1 We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage. These measures may include (as necessary):

7.1.1 protecting data using both hardware and software firewalls;

7.1.2 locating our data processing storage facilities in secure locations;

7.1.3 when necessary, disposing of or deleting your data so it is done so securely; and

7.1.4 regularly backing up and encrypting all data we hold.

7.2 We will ensure that HRLI's board members and individuals otherwise engaged by HRLI are aware of their privacy and data security obligations. We will take reasonable steps to ensure that the employees of third parties working on our behalf are aware of their privacy and data security obligations.

7.3 This notice and our procedures for handling personal data will be reviewed as necessary.

7.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted by you to us by email. Once we have received your information, we will use the procedures and security features referred to in this notice to try to prevent unauthorised access.

8. Your privacy rights

8.1 The GDPR gives you the following rights in respect of personal data we hold about you:

The right to be informed	You have a right to know about our personal data protection and data processing activities, details of which are contained in this notice.
The right of access	You can make what is known as a Subject Access Request (“SAR”) to request information about the personal data we hold about you (free of charge, save for reasonable expenses for repeat requests). If you wish to make a SAR please contact us as described below.
The right to correction	<p>Please inform us if information we hold about you is incomplete or inaccurate in any way and we will update our records as soon as possible, but in any event within one month.</p> <p>We will take reasonable steps to communicate the change to any third parties to whom we have passed the same information.</p>
The right to erasure (the ‘right to be forgotten’)	<p>Please notify us if you no longer wish us to hold personal data about you (although in the case of shareholders in HRLL or lessees, tenants or sub-tenants of a property on the Estate, in practice it is not possible to perform our functions in managing the affairs of the Estate without holding your personal data). Unless we have reasonable grounds to refuse the erasure, on receipt of such a request we will securely delete the personal data in question within one month. The data may continue to exist in certain backup, but we will take steps to ensure that it will not be accessible.</p> <p>We will communicate the erasure to any third parties to whom we have passed the same information</p>
The right to restrict processing	You can request that we no longer process your personal data in certain ways, whilst not requiring us to delete the same data.

<p>The right to data portability</p>	<p>You have right to receive copies of personal data we hold about you in a commonly used and easily storable format (please let us know a format which suits you). You may also request that we transfer your personal data directly to a third party (where technically possible).</p>
<p>The right to object</p>	<p>Unless we have overriding legitimate grounds for such processing, you may object to us using your personal data if you feel your fundamental rights and freedoms are impacted. You may also object if we use your personal data for direct marketing purposes (including profiling) or for research or statistical purposes. Please notify your objection to us and we will gladly cease such processing, unless we have overriding legitimate grounds.</p>
<p>Right to withdraw consent</p>	<p>If we are relying on your consent as the basis on which we are processing your personal data, you have the right to withdraw your consent at any time. Even if you have not expressly given your consent to our processing, you also have the right to object (see above).</p>

8.2 All SARs and other requests or notifications in respect of your above rights must be sent to us in writing by email to: admin@hrll.co.uk or by post to: Ham Riverside Lands Ltd, Suite 225, 29 Castle Street, Kingston Upon Thames, Surrey KT1 1DN.

8.3 We will endeavour to comply with such requests as soon as possible but in any event we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).

9. Data Breaches

9.1 If personal data we hold about you is subject to a breach or unauthorised disclosure or access, we will report this to the Information Commissioner's Office (ICO).

9.2 If a breach is likely to result in a risk to your data rights and freedoms, we will notify you as soon as possible.



10. Transferring your information outside Europe

10.1 We will not transfer any data in a systematic way outside of the EEA but there may be circumstances in which certain personal information is transferred outside of the EEA, in particular:

10.1.1 if you are a shareholder in HRLL or a lessee of property on the Estate and you live outside of the EEA, we may communicate with you when performing our functions in managing the affairs of the Estate and such communications may include personal information (such as Contact Information or Payment Information);

10.1.2 we may communicate with individuals or organisations outside of the EEA in performing our functions in managing the affairs of the Estate, and those communications may include personal information (such as Contact Information);

10.1.3 we may have certain third party service suppliers who are based outside the EEA or who store data outside of the EEA;

10.1.4 if you communicate with us while you are outside of the EEA there may be some data transfer to you or your device;

10.1.5 from time to time your information may be stored in devices which are used outside of the EEA by HRLL board members or contractors and advisers engaged by HRLL.

10.2 If we transfer your information outside of the EEA in a systematic way, and the third country or international organisation in question has not been deemed by the EU Commission to have adequate data protection laws, we will provide appropriate safeguards and your privacy rights will continue to be enforceable against us as outlined in this notice.



11. Notification of changes to the contents of this notice

We will notify you of any changes to this Privacy Notice by email to help ensure you are always aware of the information we collect, how we use it, and in what circumstances, if any, we share it with other parties.

12. Contact us

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal information or how it is handled, you can do so by email to: admin@hrll.co.uk or by post to: Ham Riverside Lands Ltd, Suite 225, 29 Castle Street, Kingston Upon Thames, Surrey KT1 1DN, or by telephone to: 0208 296 5806.

If we are unable to resolve any issues you may have or you would like to make a further complaint, you can contact the Information Commissioner's Office. Please visit <http://www.ico.org.uk/> for further assistance.