## **Privacy Notice**

'How we use your information'

Alscot is committed to ensuring that your privacy is protected and our use of your personal information is governed by this Privacy Notice. On this site, "Alscot", "our" and "we" each mean Alscot Estate and all / any ownership, trading identities or subsidiaries which collect and use your information in the manner set out in this Privacy Notice. Any reference to "you" or "your" refers to anyone whose personal information we process.

#### 1. Introduction

Our use of your personal data will be governed by this Privacy Notice.

Alscot is a controller for the personal information that it collects and uses about you. We will treat your personal information as confidential and in accordance with applicable data protection legislation and your personal information will only be shared with others in accordance with this Privacy Notice.

This Privacy Notice explains;

- What personal information is
- How we collect your personal information
- The types of personal information we collect
- How we use your personal information
- The legal basis for processing your personal information
- How we share your personal information
- How long we keep your personal information
- How we keep your personal information secure
- Overseas transfers of your personal information
- Your rights in relation to your personal information
- How to make complaints and how to contact us

If there are any changes to the way in which your personal information is used, this Privacy Notice will be updated.

### 2. What is personal information

Personal information is any information that tells us something about you. This could include information such as name, contact details, date of birth, bank account details or any information about your needs or circumstances which would allow us to identify you.

Some personal information is classified as "special" data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious beliefs or political opinions and sexual orientation. This information is more sensitive and we need to have further justifications for collecting, storing and using this type of personal information. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data.

Any references to personal information in this privacy notice will include personal data, and where relevant, special categories of personal data.

## 3. What personal information do we collect?

We will collect your full name and contact details (such as phone number, email address and postal address) from you whenever you engage with us.

In addition, if we are providing a service to you, where we are required to do so by law, we will collect information relating to your identity, which will be at least one form of photographic identification (such as a passport, a driving licence or an identification card) and one form of documentation with proof of your place of residence (such as a recent utility bill).

Depending on the service that we provide to you (or on your behalf) we may also collect additional personal information as detailed below;

## Letting or Renting Property

If you are wanting to rent one of our properties;

- Specific access requirements so that we can find a property that is suitable for your needs
- Your bank / building / similar account details to allow us to manage an approved tenancy deposit account for you and to set up your rental payments
- If you are a tenant renting under the 'Right to Rent' scheme we will collect details of your Biometric residence card, your immigration status document and/or your birth certificate to carry out our required checks under this scheme

### If you become a tenant

We will ask for additional emergency contact information in case we need to get in touch with you outside of working hours or in the event there is a matter requiring your urgent attention. To manage our property we will share your personal information with third party contractors as is necessary to allow us to fulfil our obligations to you.

#### Other

If you subscribe to receive news or other market updates from us, then in addition to the above we will collect details about the type of content that you would like to receive.

# 4. How we use your personal information

What is the legal basis of our data processing?

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so. We rely on the following legal bases to use your information;

- For employment-related purposes
- Where we need information to perform the contract we have entered into with you
- Where we need to comply with a legal obligation
- Where the processing is necessary for us to carry out activities for which it is in Alscot's legitimate interests (or those of a third party) to do so and provided that your interests and fundamental rights do not override those interests, including:
  - Processing that is necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns this will include sending you marketing information from time to time after you have engaged us to provide services or received services from us either which may be similar and of interest to you or where you have expressly indicated that you would like to receive such information. You have the right to opt out of receiving this information at any time.
  - Processing that is necessary to improve our knowledge of our market sectors – this will include undertaking market analysis and research so that we better understand market trends and provide better knowledge along with more tailored and relevant services for our customers in the future.
  - o Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively this will include: verifying the accuracy of information that we hold about you and create a better understanding of you as a customer; processing for administrative efficiency purposes such as where we outsource certain administrative functions to third parties who are specialised in such services; processing for network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access or to comply with a request from you in connection with the exercise of any of your rights outlined below.

In more limited circumstances we may also rely on the following legal bases:

• Where we need to protect your interests (or someone else's interests); and/or

• Where it is needed in the public interest or for official purposes

We may process special categories of personal information and criminal conviction information in the following limited circumstances:

• With your explicit consent, in which case we will explain the purpose for which the information will be used at the point where we ask for your consent.

## How we use your personal information

We have set out below, in table format, a description of the ways we plan to use your personal data. We have also identified the reasons we rely on to do so, and what our legitimate interests are where appropriate. We may process your personal data for more than one lawful ground depending upon the specific purpose for which we are using your data.

Purpose / Activity	Type of data	Our reasons	Lawful basis for processing, including basis of legitimate interest
To administer and protect our business Prevention of fraud and related offences To detect, investigate, report and seek to prevent crime (including sharing passport information) To manage risk for us and our customers	Identity data Financial data Transaction data Technical data Profile data Usage data	a) Necessary for our legitimate interests b) Our legal duty	a) For running our business, provision of administration and IT services, network security, to prevent fraud b) For reporting possible criminal acts or threats to public security c) Developing and improving how we deal with financial and other types of crime, as well as fulfilling our legal duties in this respect d) To comply with regulations that apply to us e) Being efficient about how we fulfil our legal and contractual duties and obligations
To run our business in an efficient and proper way. This includes managing our financial position; business capability; planning communications, governance and audit	Financial data Transaction data Technical data Profile data Usage data	a) Necessary for our legitimate interests b) Our legal duty	a) To comply with regulations that apply to us b) Being efficient about how we fulfil our legal and contractual duties and obligations
To enable us to fulfil landlord obligations and manage tenancies	Identity data Contact data Financial data	a) Fulfilling contracts b) Necessary for our legitimate interests c) Our legal duty	a) To operate our residential and commercial portfolio effectively

	Transaction data		
To manage disputes and complaints To negotiate and administer contracts To manage the administration of H&S, accident and food safety reporting	Identity data Contact data Financial data Transaction data	a) Fulfilling contracts b) Necessary for our legitimate interests c) Our legal duty	a) Being efficient about how we fulfil our legal and contractual duties and obligations
To sell and provide you with our products and services	Identity data Contact data Financial data Transaction data Technical data Profile data Usage data Marketing and Communications data	a) Your consent b) Fulfilling contracts b) Necessary for our legitimate interests c) Our legal duty	a) Keeping our records up to date, working our what might be of interest to you and telling you about them b) Developing products and services, and what we charge for them c) Defining types of customers for new products or services d) Seeking your consent when we need it to contact your e) Being efficient about how we fulfil our legal duties
To manage our relationships with you which will include: a) managing all bookings, sales, functions, facilities restaurant, B&B, b) customer enquiries and feedback c) administer customer accounts, orders and reservations; customer queries and complaints d) notifying you about changes to our terms and conditions e) responding to complaints and seeking to resolve them	Identity data Contact data Financial data Transaction data Technical data Profile data Usage data Marketing and Communications data	a) Your consent b) Fulfilling contracts c) Necessary for our legitimate interests	a) Being efficient about how we fulfil our legal and contractual duties and obligations b) To study how our customers use our products/services, to develop them and grow our business c) to keep our records updated and to define types of customers for our products and services d) keeping our records up to date, working out which of our products and services may interest you and telling you about them e) to develop our business and inform our marketing strategy f) seeking your consent when we need it to contact you
To process and deliver your orders including: a) managing payments fees and charges b) collecting and recovering money owed to us c) ensuring you receive the products and services you pay for	Identity data Contact data Financial data Transaction data Usage data	a) Your consent b) Fulfilling contracts c) Necessary for our legitimate interests d) Our legal duty	a) To recover debts due to us b) To be efficient about how we process and deliver your orders

# 5. How we keep your information secure

The security of information is very important to us and we have measures in place which are designed to prevent unauthorised access to your personal information including but not limited to:

- Your data is stored on secure management systems. Access is restricted on our systems to those within the business who are required to have access to your information for legitimate business purposes.
- Hard copy documentation is stored in locked cabinets.

We ensure access to personal information is restricted to Alscot employees and workers or other persons working within the Alscot on a need to know basis. Training is provided to any of those Alscot employees and workers who need access to personal information.

### 6. For how long do we keep your personal information

The period for which we will keep your personal information will depend on the type of service you have requested from us. The retention period may be longer than the period for which we are providing services to you where we have statutory or regulatory obligations to retain personal information for a longer period, or where we may need to retain the information in case of a legal claim.

# 7. Overseas transfers of your personal information

We may transfer, store, or process your personal information in locations outside the UK and the European Economic Area (EEA). Where the countries to which your personal information is transferred do not offer an equivalent level of protection for personal information to the laws of the UK, we will ensure that appropriate safeguards are put in place.

We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the European Commission Justice website.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here on the European Commission Justice website,
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. You can find out more about data protection on the European Commission Justice website.

## 8. Your rights in relation to your personal information

- You have a number of rights in relation to your personal information, these include the right to:
- Be informed about how we use your personal information
- Obtain access to your personal information that we hold
- Request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate
- Request that we erase your personal information in the following circumstances:
  - o If Alscot is continuing to process personal information beyond the period when it is necessary to do so for the purpose for which it was originally collected
  - If Alscot is relying on consent as the legal basis for processing and you withdraw consent
  - If Alscot is relying on legitimate interests as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us continue with the processing
  - If the personal information has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation)
  - If it is necessary to delete the personal information to comply with a legal obligation
- Ask us to restrict our data processing activities where you consider that:
  - o personal information is inaccurate
  - o our processing of your personal information is unlawful
  - where we no longer need the personal information but you require us to keep it to enable you to establish, exercise or defend a legal claim
  - o where you have raised an objection to our use of your personal information
- Request a copy of certain personal information that you have provided to us in a
  commonly used electronic format. This right relates to personal information that
  you have provided to us that we need in order to perform our agreement with you
  and personal information where we are relying on consent to process your
  personal information
- Object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information; and
- Not be subject to wholly automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights please contact Data@Alscot.com.

### 9. Complaints and Contact Details

### **Complaints**

If you have any complaints about the way we use your personal information please contact us at Data@Alscot.com and we will try to resolve the issue. If we cannot resolve any issue, you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK). If you need more information about how to contact your local data protection authority please let us know by contacting Data@Alscot.com.

### Contact details

If you have any questions, comments or requests regarding any aspect of this Privacy Policy, please do not hesitate to contact us by sending an email to Data@Alscot.com or writing to the Data Management Team, Alscot Estate Office, Atherstone Hill, Stratford Upon Avon CV37 8NF.

### 10. The use of cookies by Alscot

### What is a cookie?

A cookie is a small text file that is downloaded onto your computer when you visit certain websites and allows a website to recognise a user's computer. Cookies are used to help users navigate websites more efficiently and to perform certain functions, as well as to provide information to the owners of the website.

Alscot's website uses cookies for purposes which may include:

- Identifying returning users
- Eliminating the need to re-enter login in details
- Enabling you to move more easily around our website
- Tracking your use of our website
- Managing and improving the information we present to your on our website
- Analysing usage trends.

Most browsers are defaulted to accept and maintain cookies and you can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or not. Should you wish to do so, you can refuse cookies by disabling them in your web browser's settings, and you do not need to have cookies turned on to successfully use our service (however, certain features and content may not be available to you and you will have to log in every time you visit). Please consult the support documentation for your web browser, which can be found online, for more information.

By visiting Alscot's website, you consent to the use of cookies as explained above.