# Braeburn Estates Limited Partnership General Privacy Notice

### 1. Introduction

We, Braeburn Estates Limited Partnership and all associated group companies ("Braeburn Estates") of One Canada Square, Canary Wharf, London, E14 5AB, the Data Controller, are committed to respecting the privacy of individuals. This notice outlines how we collect and use your personal information, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

We have provided this Privacy notice Statement to help you understand how we collect, use and protect your information when you visit **www.canarywharf.com** and any other Braeburn Estates website on which this Privacy notice Statement is posted (each, a "**Website**" and, collectively the "**Websites**"), or otherwise communicate with us, for example by phone or in writing by mail or e-mail. We wish to help you make informed decisions, so please take a few moments to read the sections below and learn how we may use your personal information.

If you have any queries in relation to this notice, or need more information please do not hesitate to contact us at:

Data Protection Braeburn Estates One Canada Square Canary Wharf London E14 5AB

Or email us at DataProtection@BraeburnEstates.com

## 2. What personal information may we collect about you?

Most of the information we collect about you is obtained directly from you when you enter it via a website or write to us. However, we may also collect information we observe about you, for example via cookies when you visit one of our websites, or CCTV footage if you visit one of our offices or sites. We may also collect information about you from public sources.

Below we list some of the most common categories of personal information we may collect about you.

- Your contact details (including, name, date of birth, title, postal addresses, telephone numbers and email addresses) to keep in touch with you and/or contract with you;
- Financial information from an individual and/or trade contractor in order to fulfil any contractual obligations we have with your business or with a view to enter into a contract with you. This can include your payment details including your bank details;
- Any personal information you choose to give us when contacting Braeburn Estates;
- Sensitive personal information relating to your health, race or ethnicity, for monitoring equal opportunities and/or to provide you with the necessary support when attending Braeburn Estates sites and/or events taking place outside Braeburn Estates sites;
- Audio, video recordings, live stream footage and/or videography or other image(s), if your consent
  has been given, in connection with Braeburn Estates's business purposes, for advertising promotion
  and other commercial and business purposes;
- Other operational personal data created, obtained, or otherwise processed in the course of carrying
  out our business activities, including but not limited to, CCTV footage, information gathered via
  cookies regarding your use of any of Braeburn Estates / Southbank Place websites (for more
  information see our cookie policy <a href="here">here</a>) recordings of telephone conversations, logs of visitors, and
  logs of accidents, injuries and insurance claims.

#### 3. How do we use your personal information?

We collect and use information about you if you visit one our websites, utilise our services, make customer enquiries or send other communications, register for information or when you respond to communications by us.

Your relationship with us will determine why we collect particular information about you. We may be required by law to collect certain information; require it in order to perform a contract, or prior to entering into a contact with you; or use it for our legitimate business interests where these do not override your rights or interest.

We may collect and use your information to:

- Effectively respond to and deal with your query in the event that you contact us;
- Supply you with goods and/or services that you have requested;
- Ensure you see relevant and interesting content on our website(s) using your electronic information (cookies) in line with our website terms and conditions;
- Report and manage information for budgeting and forecasting;
- Process information that is required or requested by regulatory bodies or law enforcement agencies;
- Investigate, respond to and/or process any complaints, claims for loss, damage and/or injury;
- Prevent and/or detect crime;
- Monitor the safety of our employees;
- Facilitate your access to our on-site facilities;
- Obtain your views on Canary Wharf Group's services, development projects or planning proposals;
- Notify you of any events we hold which we think may be of interest to you;
- Aggregate/process personal data for research, statistical and/or scientific purposes;
- Processing audio, video recordings, live stream footage and/or videography or other image(s) for advertising, marketing and/or promotional purposes, if your consent has been provided to do so;
- Any other processing for which you have given your consent, for example receiving marketing information or surveys.

#### 4. Who has access to your personal information?

Your information will be processed by Braeburn Estates in order to fulfil our obligations to you as outlined in this notice. We may also share your details with third parties including:

- Contractors working on behalf of or in partnership with Braeburn Estates;
- Our third-party suppliers/service providers who perform functions on our behalf under contract, support our systems, operations and/or processes;
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this information, for example where processes and systems are being compliance assessed by Braeburn Estates's corporate audit or their representatives;
- Law enforcement or other regulatory bodies who can legally request access to information about you
  for prevention and detection of crime, the apprehension or prosecution of offenders, and the
  assessment or collection of tax;

## 5. Information security and International Transfers

Braeburn Estates is committed to being transparent and taking all reasonable and appropriate steps to keep your personal information secure and to protect it from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures.

We are also obliged to tell you where we use services that transfer your information internationally. At Braeburn Estates we have a strict selection process when it comes to our suppliers/ service providers and we enforce strict requirements within our contracts to ensure your personal information is stored and transferred in a way which is secure.

In the event that Braeburn Estates transfers personal information to service providers outside the EEA\* in the future, we will take all reasonable steps to ensure that your personal data is processed securely. We will only transfer personal information outside the EEA where it is compliant with applicable data protection legislation and the means of transfer provides adequate safeguards in relation to your personal information.

\*The European Economic Area currently comprises the Member states of the European Union plus Norway, Iceland and Liechtenstein.

#### 6. How long will you keep my personal information?

Information is only kept as long as necessary for the period it is required. When deciding how long we keep your information we take into account any minimum retention requirements set out in law; for example, financial and statutory reporting requirements mean we must keep certain records for a period of 7 years. Depending on the purpose for which we hold your hold your personal data, retention periods may vary and some data may be stored for longer than the stated retention period for the purposes of business continuity. Please see <u>our data protection policy</u> for further information.

# 7. Changes to this notice

Just as our business changes constantly, this notice may also change. To assist you, this notice has an effective date set out at the end of this notice.

# 8. What rights do I have with regards to my personal data?

To exercise your privacy rights please send your request in writing. We may be required to verify your identity for security purposes. Your rights are outlined below:

- The right to access information we hold about you, why we have that information, who has access to the information and where we obtained the information from.
- o The right to correct and update the information we hold about you. If the data we hold about you is out of date, incomplete or incorrect you can inform us and your data will be updated.
- The right to have your information erased. If you feel we should no longer be using your data you can request that we erase the data that we hold. Upon receiving a request for erasure we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest)
- The right to object to processing of your data. You may request that we stop processing information about you. Upon receiving your request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or bring or defend legal claims.
- The right to data portability. You have the right to request that we transfer your data to another controller.
- The right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- The right to withdraw consent at any time where we are relying on consent to process your personal data.

We will comply with your request where it is feasible to do so, within 30 days of receiving your request. There are no fees or charges for the first request. However additional requests for the same data may be subject to an administrative fee of £25 per request.

To exercise your rights please do so by writing to:

Data Protection Braeburn Estates One Canada Square Canary Wharf E14 5AB

Or e-mail DataProtection@BraeburnEstates.com

# 9. Consent

Where we need your consent to hold your information we will ask you to confirm your consent in writing and we will inform you why we are collecting the information, how we will use it, how long we keep it for, who else will have access to it and what your rights are as a data subject. Where we do rely on consent you have the

right to change your mind and withdraw that consent at any time by writing to us. If you withdraw your consent we will immediately cease using any personal information obtained and processed under that consent unless we have some other legal obligation to continue to use it.

#### 10. Use of Cookies

Braeburn Estates utilises cookies to enhance your browsing experience. Details can be found in Braeburn Estates's Cookies Policy available here.

## 11. What can I do if I am not satisfied with how my personal information is processed?

At Braeburn Estates we aim to ensure all information collected about you is done so fairly and lawfully, whilst implementing robust measures to keep your information secure. If you are not satisfied with the information provided in this notice, please contact us in the first instance so we can resolve your queries or provide you with any additional information required.

Alternatively it is your right to contact your local Data Protection Authority and lodge a complaint. In the UK the lead Data Protection Authority is the Information Commissioner. For more information please visit the Information Commissioner's office at <a href="https://www.ico.org.uk/concerns">www.ico.org.uk/concerns</a>, call them on 0303 123 1113, or write to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

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Or email us at <a href="mailto:DataProtection@BraeburnEstates.com">DataProtection@BraeburnEstates.com</a>

Effective date: 25 May 2018