

DATED: 10 MAY 2018

PRIVACY NOTICE

provided by CENTRO COMMERCIAL LIMITED

relating to

**the letting and/or rent collection
and/or management of a**

Commercial / Industrial Property

Private Landlord Version

A large, faint watermark of the CENTRO logo is visible in the bottom right corner. It features a stylized pink and blue circular graphic above the word "CENTRO" in a bold, sans-serif font, all contained within a blue, curved banner-like shape.

CENTRO

This privacy notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during the letting and/or management and/or rent collection of your commercial property and after it ends. We are required to notify you of this information under the General Data Protection Regulation.

Please ensure you read this notice (sometimes referred to as a "privacy notice" and any other similar notice we may provide to you from time to time when we collect or process personal information about you. This privacy notice contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

1. WHO WE ARE

CENTRO COMMERCIAL LIMITED collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws. We are registered with the Information Commissioner's Office (ICO), our registration number is ZA366600. In this privacy notice, references to "we" or "us" means CENTRO COMMERCIAL LIMITED.

2. DATA PROTECTION PRINCIPLES

We will comply with the data protection principles when gathering and using personal information, as set out in our GDPR data protection policy.

3. THE PERSONAL INFORMATION WE COLLECT AND USE: INFORMATION COLLECTED BY US

In the course of providing a full spectrum of services within the lettings process from the initial market appraisal to finding a suitable tenant, processing/arranging the necessary legal agreements and documentation and/or managing the property, we collect the following personal information when you provide it to us:

- Full names
- Addresses
 - Home address
 - Work address
 - Property address
- Telephone numbers
 - Home telephone numbers
 - Mobile numbers
 - Work numbers
- Email address(es)
- IP Address

- Fax number
- Bank account details
- Personal Identity Documentation
 - Passport
 - Utility bills
 - Bank statements
 - Driving licence
 - Visa (if overseas)

The provision of Personal Information including all contact details, financial information and personal ID is required from you to enable us to perform our contract as commercial agent for you as private landlord of the property. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

4. THE PERSONAL INFORMATION WE COLLECT AND USE: INFORMATION COLLECTED FROM OTHER SOURCES

We also obtain personal information from other sources as follows:

- your registered title information from The Land Registry
- Details of any court judgments from the Registry Trust Limited

5. HOW WE USE YOUR PERSONAL INFORMATION

We will typically collect and use this information for the following purposes:

- For the performance of a contract we have with.
- For the purposes of our legitimate interests or those of a third party, but only if these are not overridden by your interests, rights or freedoms.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

6. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share the following categories of personal data:

- Full names
- Addresses
 - Home address
 - Work address
 - Property address
 - Internal and external photographs
- Telephone numbers
 - Home telephone numbers
 - Mobile numbers
 - Work numbers

- Email address(es)
- IP Address

This personal information may be shared with the following categories of recipients:

- Solicitors
- Utility companies
- Regulatory of Professional Bodies
- IT Support providers
- Web Service Providers
- Ombudsman Services
- Mediation or reconciliation services
- Insurers / Insurance Brokers / Loss Adjustors
- Contractors
- Other subsidiary of associated companies of Centro Commercial Limited.

This data sharing enables us to perform our contract commercial agent.

Some of those third party recipients may be based outside the European Economic Area — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA'.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

7. WHERE YOUR PERSONAL INFORMATION MAY BE HELD

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above.

We have security measures in place to seek to ensure that there is appropriate security for information we hold including those measures detailed in our GDPR data protection policy. Or, for example, a set number of years after a data subject ceases to be a lessee in that development.

8. HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

- We will hold your information for the duration of time we let, manage or collect rent for your property, and for up to 6+1 years beyond either ending, further to which it is deleted.
- Personal information in relation to emergency contact details will be removed within 1 year of either of the above circumstances, or upon request for removal if no longer required to fulfil any contractual obligation.
- Any documents whereby certain information is required and other information not, may be anonymised if it is deemed both appropriate and correct to protect both the

contractual obligations of the Company, any legitimate third party, and not to affect the Freedoms or Rights of the individual.

- If you do not wish to receive promotional or marketing information you will be removed from any marketing list upon request.

9. REASONS WE CAN COLLECT AND USE YOUR PERSONAL INFORMATION

We rely on CONTRACT as the lawful basis on which we collect and use your personal data.

10. TRANSFER OF YOUR INFORMATION OUT OF THE EEA

It is not envisaged that we will be required to transfer your personal data to a country or territory outside of the European Economic Area (EEA), but, if required, we may transfer your personal information to a location outside of the EEA as follows:

- If the Client is based in a country or territory outside of the EEA.
- To an appropriate service provider, body or authority for the purpose of fulfilling our contract that is based in a country or territory outside of the EEA.
- Upon your authority to transfer your data to a selected party, organisation or body outside of the EEA.

Such countries do not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision that countries or territories outside of the EEA provide an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal information will be subject to such person or organisation providing suitable confirmation or clarification on the basis upon which they hold and process the data.

If you would like further information please contact us (see 'How to contact us' below). We will not otherwise transfer your personal data outside of the United Kingdom or EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

11. YOUR RIGHTS

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations

- object at any time to processing of personal information concerning you for direct marketing
 - object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
 - object in certain other situations to our continued processing of your personal information
 - otherwise restrict our processing of your personal information in certain circumstances
 - claim compensation for damages caused by our breach of any data protection laws
- For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us at Centro Commercial Limited, Mid-Day Court, 30 Brighton Road, Sutton, Surrey, SM2 5BN, the appointed officer for such matters is Paul Harwood tel: 020-8401-1000 or by e-mail to gdpr@centro.plc.uk
- let us have enough information to identify you full name, address and property address.
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them

12. KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

13. HOW TO COMPLAIN

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

14. CHANGES TO THIS PRIVACY NOTICE

This privacy notice was published on 10 May 2018 and last updated on 10 May 2018.

We may change this privacy notice from time to time, and when we do we will inform you.

