

**DATE: 5 June 2019**

**PRIVACY NOTICE**  
**provided by Centro plc**

**relating to**

**the Management of**  
**Residential or Mixed Use Developments**

A large, faint watermark of the Centro logo is visible in the background. It consists of a stylized red and white shape above the word "CENTRO" in a grey, sans-serif font.

**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 our management of your development 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 PLC 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 Z1979559. In this privacy notice, references to "we" or "us" means Centro plc.

## **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 managing the development we collect the following personal information when you provide it to us:

- Personal Data
  - Full Name
  - Contact / Property Details
    - Property Address
    - Alternative Address
    - Phone numbers (home / work / mobile / other)
    - E-mail address
    - IP Address
    - Fax number
    - Emergency contact information
    - Title Documents
    - Lease Documents
    - Power of Attorney

- Marriage certificate
  - Death certificate
- Banking or financial details
  - Bank details
  - Lender details
  - Statements of personal income / debts
  - Voluntary financial arrangements / court judgments
- Health Information
  - Medical information (for legitimate reason affecting contractual matters)

The provision of Personal Data, Banking or financial details and Health Information is required from you to enable us to perform our contract as managing agent. 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 and lease from 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 you have with our client and pursuant to which we are appointed as their agent.
- 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:

- Name
- Contact Details
- Title or Lease Information
- Banking or financial details

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

- Solicitors

- Contractors
- Engineers
- Surveyors
- Companies House
- Land Registry
- IT Support providers
- Web Service providers
- Regulatory Authorities / Bodies
- Professional Bodies
- Ombudsman Services
- Mediation / Reconciliation Services
- Police
- Fire Brigade
- Service Providers
- Client
- Insurers / Insurance Brokers / Loss Adjustors
- Accountants
- Court / Tribunal Service
- Other subsidiary of associated companies of Centro plc.

This data sharing enables us to perform our contract as managing 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**

The Company will only hold your personal information for the legitimate purpose it is required for contractual obligations, or to meet statutory or regulatory guidelines, regulations or framework.

- We will hold your information for the duration of time we manage the development, or you are the Lessee, and for up to 12+1 years beyond either ending.
- 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.
- Financial or lender information will be held for 12+1 years beyond either cessation of the above, but lender details or information no longer pertinent may be deleted periodically to thin and manage files, or deleted upon request.
- 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 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: Centro Plc, 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](mailto:gdpr@centro.plc.uk)
- let us have enough information to identify you, e.g, full name, property address and property reference.
- 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 5 June 2019 and last updated on 5 June 2019. We may change this privacy notice from time to time, and when we do we will inform you.

CENTRO