



WHETLEY MILLS

PRIVACY NOTICE

This notice explains what information Whetley Mills Ltd (Company Number 04388165) collects, when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we will recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

A. Who are we?

Whetley Mills Ltd takes the issue of security and data protection very seriously and strictly adheres to guidelines published in the General Data Protection Regulation (EU) 2016/679 which became applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

Our Data Protection Officer is TAHIR HUSSAIN, Telephone number [01274 549969], email tahir@whetleymills.co.uk

Any questions relating to this notice and our privacy practices should be sent to tahir@whetleymills.co.uk

B. How we collect information from you and what information we collect

We collect information about you from:

1. solicitors that may act on your behalf in negotiating your lease of the property or in relation to matters associated with the lease of the property following its completion;
2. other agents acting on your behalf who manage your lease affairs;
3. your bank or accountant(s) who provide financial references in order for us to give consideration as to whether or not you should be granted a lease;
4. your previous/current landlord(s) who provide a tenant reference;
5. individuals/organisations who have a trading relationship with you and who provide a tenant reference; and
6. HM Land Registry title records to confirm ownership of your home address when considering if a lease should be granted to you or if one can stand as a personal guarantor to a lease.



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We collect the following information about you:

1. full name, e-mail address, telephone number, address, any alternative addresses for invoice purposes; and
2. property address, term of lease, rent terms, deposits held, utility, service and lease responsibilities.

C. Why we need this information about you and how it will be used

We need your information and will use your information:

1. to undertake and perform our landlord obligations and duties to you in accordance with the terms of our lease with you;
2. to enable us to supply you with the services and information you may request;
3. to help you manage your lease;
4. to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
5. to contact you in order to send you details of any changes to our or supplies which may affect you; and
6. for all other purposes consistent with the proper performance of our operations and business

Sharing of your information

The information you provide to us will be treated by us as confidential and will be processed only by any third party, acting on our authority, within the UK. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

1. if we enter into a joint venture with or merged with a business entity, your information may be disclosed to our new business partners or owners;
2. if we enter into an agreement with a managing agent to undertake responsibilities and obligations of the landlord in accordance with the Lease;
3. if you are unable to make payments under the terms of your Lease, your information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you as a lessor; and/or



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in the creation, renewal or termination of a Lease, your information will be disclosed to the relevant local authority, service/utility provider, facilities manager, managing agents or any other relevant person or organisation in connection with this.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Transfers outside the UK

Your information will only be stored within the UK.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe.

A paper copy of your lease is held on file within our office.

Your full name, address, alternative address, rent details, deposit details, telephone number and email address is stored on our cloud data accounts system, Xero.

A scanned copy of the Title Register to your home address may be retained on our data filing system Synology Network Access Drive.

A paper copy of your annual service charge accounts (if undertaken) will be held on file within our office.

A paper or scanned copy of any financial or landlord references obtained prior to completion of your lease will be held on file within our office.

All paper records are held in locked filing cabinets and access to all personal computers / laptops are password protected.



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Our office is locked securely out of office hours. During office hours and access may only be gained to our building through an electronic door entry system.

How long we will keep your information

Personal data is not stored for any longer than it is reasonably required.

Your lease will be retained for the entirety of its term. If you vacate the property, the original lease will be destroyed within six months of your vacation. The scanned copy will be retained for a further six years.

Any financial or landlord references will be retained for the entirety of the lease term. The records will be destroyed within six months after vacation by you.

Any land registry title copies will be retained for the entirety of the lease term. The records will be destroyed within six months after vacation by you.

Your personal details will be retained on our data systems Synology Network Access Drive for six years after the end of your lease as required for a limited company by HMRC.

Service charge invoices and accounts will be kept for six years as required by HMRC for a limited company.

We will review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

Your rights

You have the right at any time to:

1. ask for a copy of the information about you held by us in our records;
2. require us to correct any inaccuracies in your information;
3. make a reasonable request to us to delete personal data of yours we hold; and
4. object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at tahir@whetleymills.co.uk



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CCTV POLICY STATEMENT

1.1 We believe that CCTV and other surveillance systems have a legitimate role to play in helping to maintain a safe and secure environment for all our staff and visitors. However, we recognise that this may raise concerns about the effect on individuals and their privacy. This policy is intended to address such concerns. Images recorded by surveillance systems are personal data which must be processed in accordance with data protection laws. We are committed to complying with our legal obligations and ensuring that the legal rights of staff, relating to their personal data, are recognised and respected.

1.2 In certain circumstances, misuse of information generated by CCTV or other surveillance systems could constitute a criminal offence.

ABOUT THIS POLICY

3.1 We currently use CCTV cameras to view and record individuals on and around our premises.

3.2 We recognise that information that we hold about individuals is subject to data protection legislation. The images of individuals recorded by CCTV cameras in the workplace are personal data and therefore subject to the legislation. We are committed to complying with all our legal obligations and seek to comply with best practice suggestions from the Information Commissioner's Office (**ICO**).

4. PERSONEL RESPONSIBLE

4.1 Day-to-day operational responsibility for CCTV cameras and the storage of data recorded is the responsibility of Salman Hussain

4.2 Responsibility for keeping this policy up to date has been delegated to Tahir Hussain - Director.

5. REASONS FOR THE USE OF CCTV

5.1 We currently use CCTV [around our site] as outlined below. We believe that such use is necessary for legitimate business purposes, including:

- (a) to prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;
- (b) for the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime;
- (c) to support law enforcement bodies in the prevention, detection and prosecution of crime;
- (d) to assist in day-to-day management, including ensuring the health and safety of staff and others;
- (e) to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- (f) to assist in the defence of any civil litigation, including employment tribunal proceedings and
- (g) [OTHER BUSINESS/SITE SPECIFIC PURPOSES]

This list is not exhaustive and other purposes may be or become relevant.



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6. MONITORING

6.1 Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.

7. HOW WE WILL OPERATE ANY CCTV

7.1 Where CCTV cameras are placed in the workplace, we will ensure that signs are displayed at the entrance of the surveillance zone to alert individuals that their image may be recorded. Such signs will contain details of the organisation operating the system, the purpose for using the surveillance system and who to contact for further information, where these things are not obvious to those being monitored.

7.2 We will ensure that live feeds from cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. This may include HR staff involved with disciplinary or grievance matters. Recorded images will only be viewed in designated, secure offices.

8. USE OF DATA GATHERED BY CCTV

8.1 In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

8.2 Given the large amount of data generated by surveillance systems, we may store video footage using a cloud computing system. We will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards.

8.3 We may engage data processors to process data on our behalf. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

9. RETENTION AND ERASURE OF DATA GATHERED BY CCTV

9.1 Data recorded by the CCTV system will be stored [digitally using a cloud computing system]. Data from CCTV cameras will not be retained indefinitely but will be permanently deleted once there is no reason to retain the recorded information. Exactly how long images will be retained for will vary according to the purpose for which they are being recorded. For example, where images are being recorded for crime prevention purposes, data will be kept long enough for incidents to come to light. [In all other cases, recorded images will be kept for no longer than days.



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10. USE OF ADDITIONAL SURVEILLANCE SYSTEMS

10.1 Prior to introducing any new surveillance system, including placing a new CCTV camera in any workplace location.

11. COVERT MONITORING

11.1 We will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or extremely serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue.

12. ONGOING REVIEW OF CCTV USE

12.1 We will ensure that the ongoing use of existing CCTV cameras in the workplace is reviewed periodically **OR** at least every 12 **OR** months to ensure that their use remains necessary and appropriate, and that any surveillance system is continuing to address the needs that justified its introduction.

13. REQUESTS FOR DISCLOSURE

13.2 No images from our CCTV cameras will be disclosed to any [other] third party, without express permission being given by the Director(s). Data will not normally be released unless satisfactory evidence that it is required for legal proceedings or under a court order has been produced.

13.3 In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

13.4 We will maintain a record of all disclosures of CCTV footage.

13.5 No images from CCTV will ever be posted online or disclosed to the media.

14. SUBJECT ACCESS REQUESTS

14.1 Data subjects may make a request for disclosure of their personal information and this may include CCTV images (**data subject access request**). A data subject access request is subject to the statutory conditions from time to time in place and should be made in writing.

14.2 In order for us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

14.3 We reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so.



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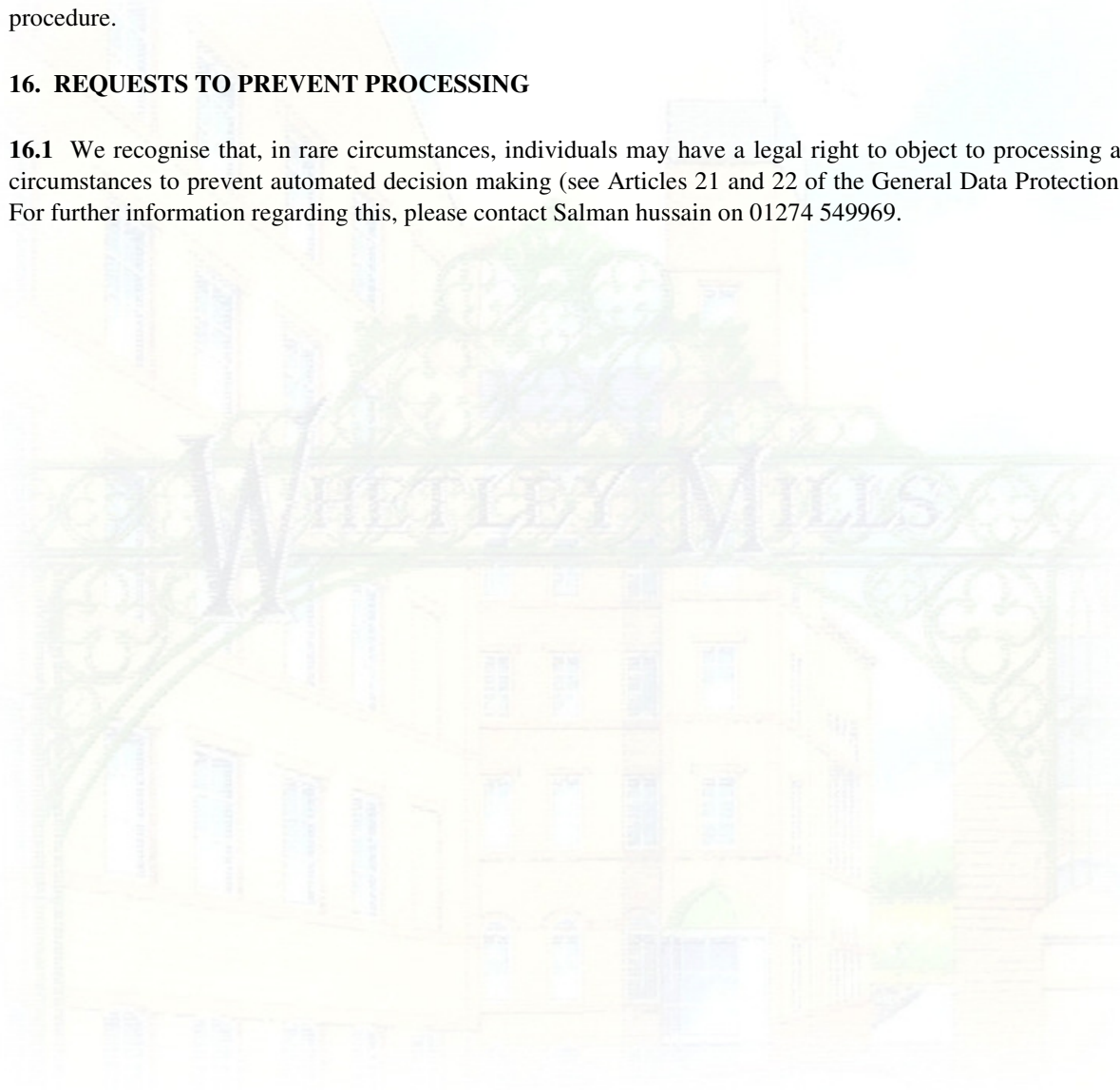
15. COMPLAINTS

15.1 If any member of staff has questions about this policy or any concerns about our use of CCTV, then they should speak to their manager **OR** the director - Salman Hussain in the first instance.

15.2 Where this is not appropriate or matters cannot be resolved informally, employees should use our formal grievance procedure.

16. REQUESTS TO PREVENT PROCESSING

16.1 We recognise that, in rare circumstances, individuals may have a legal right to object to processing and in certain circumstances to prevent automated decision making (see Articles 21 and 22 of the General Data Protection Regulation). For further information regarding this, please contact Salman hussain on 01274 549969.





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Cookies

A cookie is a piece of data stored on a user's hard drive containing information about the user. The information below explains the cookies we use on our website and why we use them:

- **Google Analytics cookies:** we use these cookies to collect information about how visitors use our website, including details of the site where the visitor has come from and the total number of times a visitor has been to our website. We use the information to improve our website and enhance the experience of its visitors.

You can enable or disable cookies by modifying the settings in your browser. You can find out how to do this, and find more information on cookies, at: www.allaboutcookies.org.

Or

Our Website - Cookies

Cookies are small text files that are placed on to your computer by websites that you visit. We use cookies on our website, which may collect personal data.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

You can set your web browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

By continuing to use our website, you are accepting our use of the cookies described below that make advertising and communications more relevant to you and your interests, and further help us to improve our website.

We use the following cookies:

Essential cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, and to use online forms.

Analytical cookies. These are persistent cookies that allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.



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Marketing cookies.

These are persistent cookies that are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences. These cookies also record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website, the advertising displayed on it and communications sent more relevant to your interests.

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113
Fax: 01625 524 510

Email: casework@ico.org.uk

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.