

# VERTUS

## RESIDENTIAL LEASING

### VERTUS RESIDENTIAL MANAGEMENT LIMITED – GENERAL PRIVACY NOTICE

#### 1. Introduction

We, Vertus Residential Management Limited and any other company established by Vertus Residential Management Limited, as part of the Canary Wharf Group of One Canada Square, Canary Wharf, London, E14 5AB ('Vertus', 'We', 'Us'), 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 General Privacy Notice to help you understand how we collect, use and protect your information in relation to:

- / Providing you with lettings and management services at 8 Water Street, Newfoundland Place, and 10 George Street (the 'Properties');
- / Your use of any Vertus affiliated website on which this General Privacy Notice is posted (each, a 'Website' and, collectively the 'Websites'); and
- / Any other communication between you and us 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  
Canary Wharf Group  
One Canada Square  
Canary Wharf  
London E14 5AB

Or email us at:  
dataprotection@canarywharf.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 when we are managing the letting of the Properties. We may also collect information we observe about you, for example via cookies when you visit one of our Websites, or footage from CCTV operating at our offices.

The types of information we will collect directly from you are:

- / Your contact and identity 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 and provide our lettings and management services;
- / Financial information in order to fulfil any contractual obligations we have with your business, to collect payments from you (such as through the direct debit scheme) or with a view to enter into a contract with you. This can include your payment details including your bank details or payment card details;
- / Residential information such as details about the property you live in, how long you have been there and any reasonable adjustments we have made for you in the provision of our services;
- / Any personal information you choose to give us when contacting Vertus;
- / Sensitive personal information relating to your health, race or ethnicity, for monitoring equal opportunities and/or to provide you with the necessary support when visiting or residing at the Properties and our marketing suite;
- / Operational personal data created, obtained, or otherwise processed in the course of carrying out our legitimate interests as a business, including but not limited to, CCTV footage, recordings of calls made to our customer service line, information gathered via cookies regarding your use of any of the Websites (for more information see our Cookie Policy which is accessible via the Website); and
- / We may also maintain logs of visitors, accidents, injuries and insurance claims at the Properties.

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

We use information about you if you visit one of our Websites, utilise our services, make customer enquiries or send other communications, register for information or when you respond to communications by us. We also use information about you in order to manage the estate and to administer our business. 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 we are contractually obliged to provide;
- / 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, questions, claims for loss, damage and/or injury;
- / Prevent and/or detect crime;
- / Comply with legal obligations in regard to storing and acquiring data;
- / Monitor the safety of our employees;
- / Obtain your views on Vertus' 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; and
- / Send you details about our related services, where you have signed up to receive such marketing communications that we feel are relevant to you. You can inform us at any time if you no longer require marketing messages.

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

Your information will be processed by Vertus 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 Vertus;
- / Our third-party agents, suppliers, and service providers who perform functions on our behalf under contract, support our systems, operations and/or processes in accordance with clause 5 below;
- / 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 Vertus' corporate audit or their representatives; and
- / 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. Third party transfers of data**

We share your personal data with the following categories of third parties:

- / Internal third parties: those in the Canary Wharf Group where we have a legitimate business interest in sharing the personal data;
- / External third parties: including service providers we may contract with in relation to metering, billing, administration, and management; and
- / Third parties to whom we may choose to sell, transfer, or merge parts of our business or assets. For example, when we transfer the ownership of the Property to another entity. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We neither allow our third-party service providers to use your personal data for their own purposes, nor sell your personal data to third parties for marketing. We only permit third parties to process your personal data for specified purposes and in accordance with our instructions.

## 6. Information security and international transfers

Vertus 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 Vertus 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 Vertus 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.

## 7. 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 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 the Canary Wharf Group data protection policy for further information.

## 8. Changes to this notice

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

## 9. 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;
- / 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; and
- / 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  
Canary Wharf Group  
One Canada Square  
Canary Wharf  
London E14 5AB

Or email us at:  
dataprotection@canarywharf.com

## **10. 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 at the above outlined address. 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.

## **11. Use of Cookies**

Vertus utilises cookies to enhance your browsing experience. Details can be found in Vertus' Cookie Policy available on the Website.

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

At Vertus 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 [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns), 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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## **Effective date:**

16 October 2019