

Hobden Group

HOBDEN ASSET MANAGEMENT LIMITED

DATA PRIVACY AND PROTECTION POLICY (CUSTOMERS, SUPPLIERS AND TENANTS)

1. INTRODUCTION

1.1. Who we are

Hobden Asset Management Limited is a company registered in England (Company No: 01911010) with its registered office at 54 Weymouth Street, London W1G 6NU ("**HAM**", "**we**", "**us**", "**our**"). We are registered with the Information Commissioner's Office, an independent body set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

We provide management services to our group of companies, which are owned by the same family as HAM. The primary business of the group is the development and letting of real estate, primary in the commercial sector. The group includes the following companies (all registered in England with its registered office at 54 Weymouth Street, London W1G 6NU unless otherwise stated):

- a) Medical Centre Holdings Limited (Company No: 02877039)*;
- b) Medical Centre Developments Limited (Company No: 02841507)*;
- c) Medical Centre Developments (GB) Limited (Company No: 05582789)*;
- d) Medical Centre Developments (UK) Limited (Company No: 16357971)*;
- e) Medical Centres Scotland 2000 Limited, registered in Scotland (Company No: SC181264) with its registered office at 5 South Charlotte Street, Edinburgh, Scotland, EH2 4AN*; and
- f) Medical Centres Scotland Limited, registered in Scotland (Company No: SC256375) with its registered office at 5 South Charlotte Street, Edinburgh, Scotland, EH2 4AN*;
- a) Hobden Capital Limited (Company No: 10840917);
- b) Rural Housing Trust Limited (Company No: 07405235)*;
- c) Hobden Estates (Kegworth) Limited (Company No: 15858253);
- d) Hobden Cromwell Limited (Company No: 02864563);
- e) Hobden Estates (Bicester) Limited (Company No: 04687834);
- f) Northchapel Limited (Company No: 09449023); and
- g) Pre-School Properties Limited (Company No: 04100583).

The companies marked with an "*" are registered with the Information Commissioner's Office in their own right as they hold and process personal data. The other companies are property holding companies, and do not hold or process personal data.

1.2. Purpose of this Privacy Policy

This policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data. It contains information about:

- (a) what personal data we may collect from you;
- (b) how we will use, store and protect your personal data;

- (c) with whom we may share personal data; and
- (d) your rights under relevant data protection laws.

We are committed to protecting your personal data and complying fully with our legal obligations under UK GDPR legislation ("UK GDPR").¹

2. WHAT PERSONAL DATA WE MAY COLLECT FROM YOU

We collect some personal data from the relevant contact personnel at our suppliers (e.g. agents, accountants, financial service providers, insurance brokers, construction professionals, surveyors etc.) and tenants of our group companies.²

Personal data that we collect and process is normally limited to identity and contact data (e.g. your name, your work email address, and the name of the organisation you work for).

3. HOW WE COLLECT PERSONAL DATA FROM YOU

We normally only collect personal data directly from you or from someone else in your organisation (e.g. provided to us by you (or someone in your organisation) via email, or provided in response to our annual tenant audit).

Occasionally, we may also collect personal data from publicly available sources (e.g. we may locate a work email address from your organisation's website and retain it for our records).

We do not use cookies (or similar technologies) to collect data from our website.

4. HOW WE USE YOUR PERSONAL DATA

Your contact details are held on a secure database managed by us, and hosted by a third party provider, Web Terrier.

Our staff and officers will be able to see and process your personal information – for example, they may access your contact details if they need to contact you in relation to your organisation's tenancy or to issue an invoice (for rent or otherwise) to your organisation.

There will also be times when we will share relevant information with other third parties, for the purposes as outlined (see below), or where we are legally required to do so. When sharing personal information, we will comply with all legal requirements of UK GDPR.

Where necessary or required, we may share your contact information as follows:

- a) With our contractors, in order to undertake repairs, maintenance or improvement works (both planned and responsive works).
- b) With other third party service providers, in connection with services performed on our behalf or on behalf of our group companies. For example, your contact details may be shared with insurance brokers for the purposes of obtaining insurance for your organisation's property.
- c) In any other circumstances in which exemptions from the UK GDPR apply.

The above list is not exhaustive as there are other circumstances where we may also be required to share personal information, for example:

- a) to meet legal obligations
- b) in connection with legal proceedings (including court orders)
- c) to protect the vital interests of an individual (in a 'life or death' situation).

¹ Including the Data Protection Act 1998 and the General Data Protection Regulation (EU) 2016/679.

² There is a separate Privacy and Data Protection Policy for Employees addressing any personal data we process for our employees. Employees should refer to the Employment Handbook in this regard.

We will never knowingly share your information with third parties for the purposes of direct marketing, unless we have obtained your consent (i.e. agreement) to do this.

5. LAWFUL BASIS FOR PROCESSING

Under UK GDPR, there are six lawful bases for processing personal data, and at least one of these must apply whenever we process personal data. We typically rely on the following lawful bases for processing personal data:

- (a) Consent: where you have given your clear consent for us to process your personal data for a specific purpose.
- (b) Contract: the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- (c) Legal obligation: the processing is necessary for us to comply with the law.
- (d) Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party, and there is not a good reason to protect your personal data which overrides those legitimate interests.

6. RETENTION OF YOUR PERSONAL DATA

We will not retain your personal data for longer than is necessary for the purposes for which the personal data is processed. When calculating the appropriate retention period for your personal data, we consider the nature and sensitivity of the personal data, the purposes for which we are processing the personal data, and any applicable statutory retention periods. Using these criteria, we regularly review the personal data which we hold and the purposes for which it is held and processed.

When we determine that personal data can no longer be retained (or where you request us to delete your data in accordance with your right to do so – please see Section 9 below for more information), we ensure that this personal data is securely deleted or destroyed.

7. ACCURACY OF YOUR PERSONAL DATA

It is important that the personal data we hold about you is accurate and current. Please keep us informed (using the contact details in Section 12 below) if your personal data changes during your relationship with us.

8. YOUR RIGHT TO OBJECT TO US PROCESSING YOUR INFORMATION

Where we are processing your information based solely on our legitimate interests (or those of a third party), you have the right to object to that processing if you give us specific reasons why you are objecting, which are based on your particular situation. If you object, we can no longer process your information unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

Please contact us using the contact details in Section 12 below if you wish to object in this way.

9. YOUR RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK FOR IT TO BE ERASED

You have the right to request access to personal data that we may process about you and to require us to correct any inaccuracies in your personal data. Please contact us using the contact details in Section 12 below if you would like to correct or request access to information that we hold relating to you.

You also have the right to ask for the personal data we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Please contact us using the contact details in Section 12 below if you would like us to provide you with further information about the right to be forgotten.

10. KEEPING YOUR PERSONAL INFORMATION SECURE

We ensure that appropriate security measures are in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

11. HOW TO COMPLAIN

We hope that we can resolve any query or concern you raise about our use of your information – please contact us using the contact details in Section 12 below if you have any concerns in this regard. If not, you have the right to raise any concerns in relation to how we process your personal data to the Information Commissioner's Office (ICO) at ico.org.uk/concerns/ or telephone: 0303 123 1113.

12. CONTACT DETAILS

Please feel free to contact us if you require any further information about this policy or how your personal data is processed. Our contact details are:

Contact Name: Michael Sharp (Director, Company Secretary)

Email address: michael.sharp@hobden-group.co.uk

Postal address: 54 Weymouth Street, London W1G 6NU

Telephone number: 0207 9355042