

Arch Estate: Privacy Notice

Arch Commercial and how we handle your information

Everyone working for Arch Commercial Enterprise Limited has a legal duty to keep and process information about you in accordance with the law. This document aims to explain why we ask for your personal information, how that information will be used and how you can access your records.

Why is information recorded about me?

We use information about Arch Commercial tenants and customers to enable us to provide you with our commercial premises, including office, industrial, retail and leisure space. It allows us to deliver our services and carry out specific building maintenance and facilities management functions, for which we are responsible. We keep records about Arch Commercial tenants and customers that are written down (manual records), and ones kept on a computer (electronic records) and in our finance database.

These records may include:

- Basic details about you, for example your name, your business name and address, your telephone number/s and email addresses.
- Unique identifiers, such as your home address.
- Your bank details.
- Copies of your leases or tenancy agreements, current and historic.
- Copies of your service charges, current and historic.
- Contact we have had with you, for example, meetings with Arch staff and copies of correspondence.
- Notes and reports about your relevant circumstances.
- CCTV images.

What is the information used for?

Your information is used to principally to enter into a legal agreement and ensure we provide you with the services you require from Arch Commercial Enterprise Limited and meet our statutory obligations. It is important your records are accurate and up-to-date as they will help ensure our staff are able to provide you with the help, advice or support you need.

During the process of creating a tenancy agreement, we use Credit Safe UK to carry out a credit check and you are asked to sign a consent form as part of our application process to enable us to do this. Credit Safe have their own Privacy Policy, which is available online at www.creditsafe.com/gb/en/legal/privacy-policy.html

If you do not want to provide us with information or the consent for the credit check you should not use our services. We would not be able to create a lease or tenancy agreement, which means you would have no legal basis to occupy our premises. We would also be unable to generate correct rent and service charge

invoices or receive payments, and without your payments you would be in breach of any lease or tenancy agreement.

Arch outsource the management of service charges to third-party agents, where this is the case, your details, including a copy of the lease you have signed will be shared with them. Our agent will engage with you directly on our behalf for the duration of your lease.

We have CCTV systems recording external and internal images at the sites specified below. These are used for retrospective review only, they are not actively monitored. The systems record images to a local hard drive.

- Grasmere Way.
- Ashington Workspace Industrial Units.
- Wansbeck Business Park including Esther Court, Ashington Court and the remainder of the Business Park.
- Green Lane Workshops.
- Merchant Court.
- Ashwood Business Park.
- Wansbeck Network Centre.
- Nelson Park Network Centre (Cramlington).
- Jarrow Network Centre.
- Glover Network Centre (Washington).

How long is the information used for?

In order to provide you with this service, we rely on the legal basis of Article 6(1) (b) which states processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract. Your details will be kept for the duration of your tenancy agreement and then archived as per our Document Retention Policy. Processing is kept to a minimum and will only be processed in accordance with the law.

Our CCTV hard drives retain images for up to 14 days and then the information is recorded over permanently and is not retrievable.

Sharing your information

When other suppliers are involved in the delivery of your services with Arch Commercial Enterprise Limited, for example setting up service charges, we may need to share details about you to enable us to work together for your benefit. Information will only be shared with third parties if they have genuine and lawful need for it.

Occasions when your information needs to be disclosed (shared) include:

- To carry out maintenance tasks on your behalf at your premises or on the Estate where your premises are based.
- Where the health and safety of others is at risk.

- When the law requires us to pass on information under special circumstances.

Anyone who receives information from us has a legal duty to keep it confidential

We are required by law to report certain information to appropriate authorities – for example:

- Where a formal court order has been issued.
- Where we encounter infectious diseases which may be a public health concern.

Partner organisations who receive information about you

As outlined above, our application process involves sharing information with Credit Safe UK to carry out a credit check. The Privacy Policy of Credit Safe states that information could be shared outside of the European Economic Area (EEA), but that any parties processing personal data would be compliant with UK law.

Arch Commercial Enterprise Limited outsource most, though not all, reactive and planned repair jobs. We maintain a list of Approved Contractors to allocate orders to. Our Approved Contractors list is published on our website and available to view at any time, or this information can be requested from our Head Office. See the further information section below for our contact details. In the event you report a repair at your premises, your name, address and contact details would be issued to an Approved Contractor. Note however, that on some occasions, the person attending to your repair could be an Arch member of staff and no data would be shared externally.

Arch Commercial Enterprise Limited also outsource our out of hours emergency repair telephone service. A third party answers our telephones outside of our business hours and would be responsible for collecting your name, address and contact details. They too would pass on the details to an Approved Contractor. If you occupy space at one of our Network Centres in either Jarrow, Cramlington, Washington or Ashington, your name, address and emergency contact details would be provided to the out of hours contractor in advance and as soon as you occupy space at one of these sites. This is to enable them to respond to security alarms. Our current out of hours contractor for the emergency repair telephone line is Reay Security Limited.

Estates with service charges are outsourced to Agents (as outlined above). The agents we currently use are Knight Frank LLP, Sanderson Weatherall and Workman LLP.

Arch Commercial Enterprise Limited engage with reputable and competent contractors to supply, service and maintain equipment on site, which includes our CCTV Systems. Through the process of maintaining this equipment, it is possible the service engineer will have access to personal data, i.e. an image stored on the

hard drive at a particular site. Our current maintenance companies for this kind of equipment are: Reay Security Limited and CEFS Limited.

With the exception of credit checks via Credit Safe UK (as set out above), your information will only be processed within the European Economic Area (EEA) and will not be shared with overseas recipients.

Can I see my records?

The General Data Protection Regulation allows you to find out what information is held about you, on paper and computer records. This is known as 'right of subject access' and applies to your Arch Workspace records with Arch Commercial Enterprise Limited, along with all other personal records we hold.

If you wish to see a copy of your records you should submit a Subject Access Request directly to The Data Protection Officer at Wansbeck Workspace, Rotary Parkway, Ashington, Northumberland, NE63 8QZ or by emailing dpo@arch-group.co.uk or by calling 01670 528400. You are entitled to receive a copy of your records free of charge, within a month. In certain circumstances access to your records may be limited, for example, if the records you have asked for contain information relating to another person.

Do I have Other Rights?

Data Protection laws gives you the right:

1. To be informed why, where and how we use your information.
2. To ask for access to your information.
3. To ask for information to be corrected if inaccurate or incomplete.
4. To ask for your information to be deleted or removed where there is no need for us to continue processing it.
5. To ask us to restrict the use of your information.
6. To ask us to copy or transfer your information from one IT system to another in a safe and secure way, without impacting the quality of the information.
7. To object to how your information is used.
8. To challenge any decisions made without human intervention (automated decision making).
9. To lodge a complaint with the Information Commissioner's Office whose contact details are below.
10. If our processing is based upon your consent, to withdraw your consent.

Further information

If you would like to know more about how we use your information, or if for any reason you do not wish to have your information used in any of the ways described in this leaflet, please tell us. Please contact the Data Protection Officer on 01670 528400 or at email address dpo@arch-group.co.uk

Details of the Information Commissioner can be found at: <https://ico.org.uk/>