

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We are a leading property management company acting on behalf of freehold, head leasehold or rent charge owning companies. We undertake all administrative functions on their behalf, as required by each property lease or conveyance and advise on all aspects of freehold management, which includes the collection of rent, recovery of other costs and advising Landlords on best practise regarding issues such as rent collection, service charge management and lease extensions.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (**UK GDPR**).

**1. Key terms**

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	County Estate Pubs Limited, company number 06465836 (incorporated in England and Wales), with registered office address of Suite 2 De Walden Court, 85 New Cavendish Street, London, W1W 6XD and our group companies
Our data protection manager	Can be contacted via <a href="mailto:privacy@countystatepubs.co.uk">privacy@countystatepubs.co.uk</a>
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership  Genetic and biometric data (when processed to uniquely identify an individual)  Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to

**2. Personal data we collect about you**

The personal data we collect about you depends on the particular services we provide to you. We may collect and use any one or more of the following personal data about you:

- your name and contact information, including email address and telephone number and company details

- information to check and verify your identity, e.g. your date of birth, copy passports and home address details
- your gender, if you choose to give this to us
- location data, if you choose to give this to us
- your billing information, transaction and payment card information
- information to enable us to undertake credit or other financial checks on you
- mortgage and bank details

We collect and use this personal data for the purposes described in the section ‘**How and why we use your personal data**’ below. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

### 3. How your personal data is collected

We collect most of this personal data directly from you—in person, by telephone, text or email. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- from third party property developers and their agent or solicitor;
- from publicly accessible sources of any County Court Judgements / Bankruptcy orders;
- directly from a third party, e.g.:
  - sanctions screening providers;
  - credit reference agencies;
  - solicitors with whom we are dealing in connection with you;
  - collection agents;
  - your landlord;
  - your managing agent; and
  - customer due diligence providers.
- from a third party with your consent, e.g. your bank, building society

### 4. How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services to you which may include issuing demands and reminders for rent and other sums due under the lease, contacting you in relation to other lease administration	To perform our contract with you or to take steps at your request before entering into a contract

What we use your personal data for	Our reasons
matters such as subletting, consent or lease assignment requirements, and contacting you in relation to options to buy, extend or redeem our client's interest	
Providing services to third parties	<p>To perform services for third parties where you have an arrangement with or commitment to such third party i.e. for managing agents or landlords</p> <p>For our legitimate interest as property agent, fulfilling our client's legal and contractual obligations in accordance with the property lease or conveyance</p>
Preventing and detecting fraud against you or us	For our legitimate interest, i.e. to minimise fraud that could be damaging for you and/or us
<p>Conducting checks to identify our customers and verify their identity</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law or rules issued by our professional regulator</p>	To comply with our legal and regulatory obligations
To enforce legal rights or defend or undertake legal proceedings	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>–to comply with our legal and regulatory obligations;</li> <li>–in other cases, for our legitimate interests, i.e. to protect our business, interests and rights;</li> <li>–to assists our clients in protecting their business, interests and enforcing their rights;</li> </ul>
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests, i.e. to make sure we are following our own internal procedures, so we can deliver the best service to you

What we use your personal data for	Our reasons
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>–for our legitimate interests, i.e. to protect trade secrets and other commercially valuable information;</li> <li>–to comply with our legal and regulatory obligations</li> </ul>
Preventing unauthorised access and modifications to systems	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>–for our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you, or clients and/or us;</li> <li>–to comply with our legal and regulatory obligations</li> </ul>
Protecting the security of systems and data used to provide the services	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you, our clients and/or us</p>
Updating customer records	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>–to perform our contract with you or to take steps at your request before entering into a contract;</li> <li>–to perform our contract with our clients where you are a customer/tenant and we are maintaining records on behalf of our clients;</li> <li>–to comply with our legal and regulatory obligations;</li> <li>–for our legitimate interests, e.g. making sure that we can keep in touch with our customers about existing orders and new products</li> </ul>

What we use your personal data for	Our reasons
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>–to comply with our legal and regulatory obligations;</li> <li>–for our legitimate interests, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</li> </ul>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> <li>–existing and former customers;</li> <li>–third parties who have previously expressed an interest in our services;</li> <li>–third parties with whom we have had no previous dealings.</li> </ul>	For our legitimate interests, i.e. to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our and our clients' legitimate interests, i.e. to ensure our clients and their clients/tenants are likely to be able to pay for services/rent and other leasehold commitments
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>–for our legitimate interests, i.e. to maintain or obtain quality assurance accreditations;</li> <li>–to comply with our legal and regulatory obligations</li> </ul>
<p>To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency</p> <p>In such cases information will be anonymised where possible and only shared where necessary</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>–to comply with our legal and regulatory obligations;</li> <li>–in other cases, for our legitimate interests, i.e. to protect, realise or grow the value in our business and assets</li> </ul>

## 5. How and why we use your personal data—sharing

See **'Who we share your personal data with'** for further information on the steps we will take to protect your personal data where we need to share it with others.

## 6. Who we share your personal data with

We routinely share personal data with:

- companies within the same corporate group or under common control
- clients (landlords and management companies), their directors and employees
- site staff, other managing agents, contractors
- insurance companies and intermediaries such as brokers and loss adjusters
- accountants, debt collection agencies
- Local Authorities, emergency services such as police and fire brigade
- Regulatory bodies.
- third parties we use to help deliver our services to you, e.g. payment service providers, managing agents, landlords
- other third parties we use to help us run our business, e.g. website hosts and software service providers
- our bank
- other parties to your lease or who manage the administration of your lease and/or other property arrangements i.e. landlords, third parties also instructed by your landlord and/or property owner in connection with your lease/property management;
- professional block managers / surveyors

We or the third parties mentioned above occasionally also share personal data with:

- our and their external auditors, e.g. in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations and/or to obtain the enforcement of your legal obligations to us and/or our clients
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, share sale, initial public offering or in the event of our insolvency—usually, information will be anonymised, but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

## 7. Who we share your personal data with—further information

If you would like more information about who we share our data with and why, please contact us (see **'How to contact us'** below).

## 8. Where your personal data is held

Personal data may be held at our offices and those of our group, service providers, representatives and agents as described above (see above: **'Who we share your personal data with'**).

## 9. How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used. For example:

- accounting records are retained for 7 years (as required by the Companies Act 2006 plus 1 year);
- property information (e.g. deeds and leases) are kept for the period where you are the owner and then for a further 3 years after the termination of us as managing agent.

Different retention periods apply for different types of personal data.

If you no longer have an account with us or we are no longer providing services to you, we will delete or anonymise your account data after seven years.

## 10. Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object:  —at any time to your personal data being processed for direct marketing (including profiling);  —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims

Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consents	<p>If you have provided us with a consent to use your personal data, you have a right to withdraw that consent easily at any time</p> <p>You may withdraw consents by [insert details as relevant depending on consents]</p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>

For more information on each of those rights, including the circumstances in which they apply, please contact us (see ‘**How to contact us**’ below) or see the [Guidance from the UK Information Commissioner’s Office \(ICO\) on individuals’ rights](#).

If you would like to exercise any of those rights, please:

- complete a data subject request form; or
- email, call or write to us—see below: ‘**How to contact us**’; and
- provide enough information to identify yourself (e.g. your full name, address and customer or matter reference number) and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

## 11. Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures 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.

## 12. How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below ‘**How to contact us**’). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner in the UK

The UK’s Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.



### **13. Changes to this privacy policy**

This privacy notice was published on 23 May 2018 and last updated on 04 May 2022

We may change this privacy notice from time to time—when we do we will inform you via our website.

### **14. How to contact us**

You can contact us and/or our Data Protection Manager by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details / Our Data Protection Officers Contact Details
Newbury House, Aintree Avenue, Whitehorse Business Park, Trowbridge, Wiltshire BA14 0XB <a href="mailto:privacy@countystatepubs.co.uk">privacy@countystatepubs.co.uk</a> 01373 828700