

## **PRIVACY POLICY**

### **1. GENERAL**

Wharfedale Limited (“we” “us” “our”) are committed to protecting and respecting your privacy. For the purposes of data protection legislation, we are the data controller and we will process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 and national laws which relate to the processing of personal data. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### **2. VISITORS TO OUR WEBSITE**

2.1 We may collect and process personal data about you in the following circumstances:

2.1.1 when you complete forms on our website (“Site”). This includes your name, address, email and telephone number, which is provided at the time of registering to use our Site, where you ask us to contact you about our goods or services, subscribe to our mailing list, or subscribe/request our goods and services;

2.1.2 whenever you provide information to us when reporting a problem with our Site, making a complaint, making an enquiry or contacting us for any other reason. If you contact us, we may keep a record of that correspondence;

2.1.3 details of your visits to our Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise, and the resources that you access (see section 2.2.2 on Cookies below); and

2.1.4 whenever you disclose your information to us, or we collect information from you in any other way, through our Site.

2.2 We may also collect data in the following ways:

#### **IP Address**

We may collect information about your device, including where available your Internet Protocol address, for reasons of fraud protection. We may also collect information about your device’s operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

2.3 Our website does not use cookies.

### **3. CCTV**

3.1 Some of our properties have CCTV for the purposes of prevention and detection of crime. These recordings contain images of people who access those properties. The CCTV database and monitoring is carried out by a third party company. Our staff may need to access that data in line with our legitimate interests.

3.2 The images captured and associated information may be shared with the police and our insurers in the event of an incident.

### **4. TENANTS**

4.1 We collect details such as your name, email address, financial information and telephone number in order to perform our contract with you, comply with a legal obligation or for our legitimate business interests.

4.2 We use these details so that we can contact you about matters affecting the property such as maintenance and repair work required and in relation to any service charges or rent due and payable. Where you fail to pay your service charge or rent, we may share your information with our solicitors as part of our debt recovery process.

- 4.3 We will keep your personal data for as long as you continue to be a tenant and for a period of time thereafter as determinable by the law in force at the time. For example we will need to keep your data to comply with any property, insurance or tax legal requirements.

## **5. SUPPLIERS**

- 5.1 We will collect details such as your name, address, email address, telephone number and financial information in order to contact you about goods or services ordered with you and to place further orders.

- 5.2 We will keep the personal data for as long as we require your goods and services.

## **6. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA**

- 6.1 In accordance with data protection legislation we are required to notify you of the legal basis upon which we process your personal data. We process your personal data for the following reasons:

- 6.1.1 for performance of a contract we enter into with you;
- 6.1.2 where necessary for compliance with a legal obligation we are subject to; and
- 6.1.3 for our legitimate interests (as described within this policy).

## **7. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

- 7.1 In addition to the third parties mentioned above, we may disclose your information to third parties for the following legitimate interests Wharfedale Limited:

- 7.1.1 to staff members in order to facilitate the provision of goods or services to you;
- 7.1.2 to our affiliated entities to support internal administration;
- 7.1.3 IT providers; and
- 7.1.4 to a prospective buyer of some or all of our business or assets, in which case personal data including personal data will also be one of the transferred assets.

- 7.2 We may disclose personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms and conditions and other agreements; or to protect our rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

- 7.3 We will not sell or distribute personal data to other organisations without your approval.

## **8. CROSS-BORDER DATA TRANSFERS**

- 8.1 We will not transfer your personal data outside the European Economic Area.

## **9. DATA SECURITY**

- 9.1 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted to our Site; any transmission is at your own risk.

- 9.2 We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

## **10. ACCESS TO, UPDATING, DELETING AND RESTRICTING USE OF PERSONAL DATA**

- 10.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if the personal data we hold about you changes.

- 10.2 Data protection legislation gives you the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided. You also have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your personal information, please send an email to [office@wharfedaleproperty.co.uk](mailto:office@wharfedaleproperty.co.uk). In certain circumstances we reserve the right to charge a reasonable fee to comply with your request.
- 10.3 You can also ask us to undertake the following:
- 10.3.1 update or amend your personal data if you feel this is inaccurate;
  - 10.3.2 remove your personal data from our database entirely;
  - 10.3.3 send you copies of your personal data in a commonly used format and transfer your information to another entity where you have supplied this to us, and we process this electronically with your consent or where necessary for the performance of a contract; or
  - 10.3.4 restrict the use of your personal data.
- 10.4 We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Data protection legislation may allow or require us to refuse to provide you with access to some or all the personal data that we hold about you or to comply with any requests made in accordance with your rights referred to above. If we cannot provide you with access to your personal data, or process any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.
- 10.5 Please send any requests relating to the above to [office@wharfedaleproperty.co.uk](mailto:office@wharfedaleproperty.co.uk) specifying your name and the action you would like us to undertake.

## **11. RIGHT TO WITHDRAW CONSENT**

Where you have provided your consent to the collection, processing and transfer of your personal data, you have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, please contact us at [office@wharfedaleproperty.co.uk](mailto:office@wharfedaleproperty.co.uk).

## **12. CHANGES TO OUR PRIVACY POLICY**

We reserve the right to update this privacy policy at any time, and any changes we make to our privacy policy will be posted on this page. We will notify you if there are any changes to this policy that materially affect how we collect, store or process your personal data. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal without your knowledge or consent where required by applicable law or regulation.

## **13. CONTACT US**

If you have any questions, comments or requests regarding this policy or how we use your personal data please contact us at [office@wharfedaleproperty.co.uk](mailto:office@wharfedaleproperty.co.uk). This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at <https://ico.org.uk/global/contact-us/>

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