

Stroud Regeneration Limited Privacy Notice

Stroud Regeneration Limited (“we”, “us” and “our”) are committed to protecting the privacy and security of the data you provide to us.

Stroud Regeneration Limited is a limited company with registered company number 11140329 and its registered office is at Dransfield House, 2 Fox Valley Way, Fox Valley, Sheffield, S36 2AB and is the owner of Five Valleys Shopping Centre, Stroud, Gloucestershire trading under Five Valleys Shopping Centre, Stroud, Gloucester.

This privacy notice describes how and why we collect personal data about you and how such data is used and shared and also applies to your representatives which in this notice will be included within reference to you. This privacy notice outlines how we intend to comply with the General Data Protection Regulations (GDPR) and Data Protection Act 2018.

We are “data controllers”. This means that we are responsible for deciding how we collect and process personal data about you. We are required under data protection legislation to notify you of the information contained within this privacy notice and would point out that this notice may change from time to time, so please re-visit this page regularly to ensure that you are happy with any changes.

How and what information do we collect about you?

In accordance with the GDPR we will seek to ensure that the following Data Protection Principles are followed and that the personal information we hold about you is:

1. Used lawfully, fairly and in a transparent way;
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with these purposes;
3. Relevant to the purpose we have told you about and limited only to those purposes;
4. Accurate and kept up to date;
5. Kept only as long as necessary for the purposes we have told you about;
6. Kept securely.

In connection with our provision of services we may receive information about you or via third parties. The information we may collect or receive may include the following categories of personal information about you:

- Identity data (personal information) and contact data; including name, title, address, telephone number, personal email, address, date of birth, marital status, gender, next of kin, emergency contact details, National Insurance number, car registration details;
- Cardholder/payment card details/bank account details and other financial information;
- Information about services you have received from us in the past or services in which you have expressed an interest;
- The circumstances in relation to which you require our advice;
- Marketing and communications data including your preferences in receiving marketing from us and our third parties and your communication preferences;
- Monitoring data; we may record phone calls and retain transcripts of dialogue either for our records or for training purposes. If you visit our site your image may be recorded on CCTV for security purposes.
- Details of your employment history and other employment information, records and qualifications, including performance and disciplinary and grievance information.
- Any information you provide to us during any interview including results of any skill-based assessments forming part of our interview process;
- Information to verify your identity such as passport, driving licence or utility bills, including verification regarding your eligibility to work lawfully in the UK;
- Information relating to your legal history and previous transactions or proceedings in which you have been involved;

We may supplement this personal data collected with information from publicly available sources such as information to validate your address, or to perform a credit check.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- Information about your health, including any medical condition, health and sickness records;
- Information about criminal convictions and offences.

How will we use this information?

We will use this information to:

- Identify and communicate with you;
- Carry out client, tenant/guarantor conflict checks, and background reference checks where applicable;
- Manage payments, fees and charges and recover monies due to us;
- Analyse your/our legal position and assist you in the management of queries, complaints or claims;
- Manage the delivery of services to you, keep records relating to our provision of services and provide information about services we can provide;
- Assist in the running of our business, website and manage and deliver projects for business improvement including accounting and auditing procedures;
- Comply with legal or regulatory requirements, including reporting of information to regulatory bodies;
- To verify the accuracy of data that we hold about you and to create a better understanding of you as a tenant and your customers;
- Carry out valuations, refinancing and disposal of assets, collection of rent, conduct of rent reviews or other matters arising under a Lease or Licence.
- To create a profile of you based on any data supplied to enable us to decide what products and services to offer you for marketing purposes;
- Enable you to partake in a prize draw, competition or complete a survey;
- Assess your skills, qualifications and suitability for any employment we may offer you;
- Take steps preparatory to entering into a contract with you (for example, if we make you an offer of employment, including taking up references and a DBS check or if we are entering into any other form of contract for the provision of services);
- Pay you if we offer you employment and deduct tax and National Insurance contributions;
- Enrol you in our pension arrangement to comply with our statutory automatic enrolment duties;
- Conduct performance reviews; managing performance and determining performance requirements.

How do we use particularly sensitive information?

We will use your particularly sensitive information in the following ways:

- To consider whether we need to provide appropriate adjustments during the provision of services to you;
- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, including at interview;
- To ensure meaningful equal opportunity monitoring and reporting;
- To analyse your/our legal position;
- To manage the delivery of services to you.

How do we use information about criminal convictions?

We envisage that we will in some cases process information about criminal convictions.

We may collect information about your criminal convictions history if we would like to offer you a role in employment to satisfy ourselves that there

is nothing in your criminal convictions history that would make you unsuitable for the role.

We shall comply with appropriate safeguards which are required by law when processing such data.

Why do we need this information?

The legal bases we rely on for processing your personal information are one or more of the following:

- Consent has been obtained;
- Processing is necessary for the performance of a contract with you or steps preparatory to such a contract;
- Processing is necessary for compliance with a legal obligation; or
- Processing is necessary for our legitimate interests.

For special category personal information where:

- You have given explicit consent;
- Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- Processing is necessary for reasons of substantial public interest.

If you fail to provide information when requested which is necessary for us to undertake compliance activities or provide services, we may have to cease our provision of services.

If you fail to provide information when requested which is necessary for us to consider any job application (such as evidence of qualifications or work history) we will not be able to process the application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with one of the purposes listed above, if we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so or seek your consent.

Where you have provided consent

Where you have given us your consent (via our opt-in consent process), we will use and process your personal data to send you email communications about events, products and news updates and relevant news and our announcements, which we refer to as “Centralised Communications” in the “Marketing and other Communications” section below. Such communications may include content on relevant updates and event invitations and other news/announcements.

Please note that your information may be used to send you details of our products or services that we have identified as likely to be of interest to you, based on the preferences you have indicated to us.

We will seek separate and specific consent from you in circumstances where we wish to feature your identity in a published case study, press release, advertisement or testimonial or wish to include your image in a photograph or video in connection with public relations or promotional activities.

Sharing your information

We will not ordinarily share your information with anyone else. However, there are certain circumstances where we will be required to share your information with organisations as part of the services provided to you and our professional compliance. We will comply with the Data Protection Act 2018 when making this disclosure.

Where it is required or necessary we may share information with:

- Internal third parties;
- External third parties;
- Our regulator and professional bodies;
- Suppliers and service providers;
- Auditors;
- Insurers;
- Solicitors and Barristers;
- Expert witnesses;

- Courts and Tribunals;
- Official registries;
- Other parties to transactions or proceedings;
- Medical Professionals and other expert advisers ;
- Banks and other lending institutions and credit/debit card payment processors;
- Pension providers;
- Managing agents, estate agents, lenders, purchasers, sellers and valuers.

Other ways in which we may share your personal data

We may transfer your personal data to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal data if we are under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to protect your vital interests, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors, clients, tenants and customers. However, we will always take steps to ensure that your privacy rights continue to be protected.

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator in the circumstances of a suspected breach where we are legally required to do so.

How long do we keep information about you?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. The length of time for which we retain it is determined by a number of factors, including the type of data, the purpose for which we use that data and our regulatory and legal obligations attached to that use.

After this period, we will securely destroy your personal information in accordance with our applicable policy.

The only exceptions to this are where:

The law requires us to hold your personal data for a longer period, or delete it sooner;

You exercise your right to have the data erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law;

In limited cases, the law permits us to keep your personal data indefinitely provided we have certain procedures in place; and

You are an existing tenant or employee for example and such data is still required on an ongoing basis.

How can you access and control your personal data?

You can find out if we hold any personal information about you by making a “data subject access request” under the GDPR. If we do hold information about you, we will:

- Give you a description of it;
- Tell you why we are holding it;
- Tell you who it has been disclosed to; and
- Let you have a copy of the information in an intelligible form.



You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

- Police forces and/or Crown Prosecution Service or other prosecuting authorities;

You can request access to the information we hold about you at any time by contacting us (please see contact details in the section below). Please mark your request for the attention of our Data Protection Officer (see our "Contacting us" section below).

We may not provide you with a copy of your personal data if it concerns other individuals or we have another lawful reason to withhold that data. You will not normally have to pay a fee to access your personal data. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in such circumstances.

Website Security

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 data transmitted to our website and any transmission is at your own risk. Once we have received your personal data, we have in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration or unauthorised access.

Use of 'Cookies'

Like many other websites, our website uses cookies (including Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes to our website). 'Cookies' are small pieces of information sent to your computer and stored on its hard drive to allow our website to recognise you when you visit.

Your rights

If you believe that any of the personal information we hold about you is incorrect you have the right to ask us to rectify that information at any time.

You may also have the right, in certain circumstances, to request that we delete your personal information, to block any further processing of your personal information or to object to the processing of your personal information. There are some specific circumstances where these rights do not apply and we can refuse to deal with your request.

If we are processing your personal information based upon your consent (e.g. as part of our marketing or promotional activities), you have the right to withdraw your consent at any time.

If you require any further information about your right to rectification, erasure, restriction of or object to processing or you wish to withdraw your consent please contact us (please see "Contacting us" section below).

In the meantime, if you change your name or address/email address, please let us know by contacting us using the details set out at the end of this policy.

Complaints

We take any complaints we receive about the collection and use of personal information very seriously. We would encourage you to bring it to our attention if you think that our collection or use of information is unfair, misleading or inappropriate. You can make a complaint at any time by contacting us (see "Contacting us" section below).

If you think our collection or use of personal information is unfair, misleading or inappropriate or if you have concerns about the security of your personal information, you also have the right to make a complaint to the Information Commissioner's Office. You can contact the Information Commissioner's Office at the following address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Marketing and other Communications

You will only receive Centralised Communications from us (including information about our products and services, relevant updates, and event invitations and other news/announcements) if you indicate to us a preference ("opt-in") to do so. You may be invited to complete a client consent/opt-in process by email as a result of any of the following:

- You or your employer becoming our tenant or employee;
- Your attendance at an event hosted or co-hosted by us;
- Your attendance at a 'public' event organised or co-hosted by us that has been promoted via social media or other advertisement;
- You providing a business card directly to us at (for example) a trade or networking/business event;
- Your registering your brief contact details in order to obtain information from us;
- An email request from you to attend an event we have advertised via social media or on our website via a third party.

We may contact you in response to an article or social media promotion that you have carried out.

If you are a tenant or contact of ours, we may contact you personally to notify you of changes that might affect you or your business, or specific events/information that may benefit you or your business.

We will never share your information with other third parties for their own marketing uses, although we may use service providers to assist us with our own marketing.

If you would like to change your preferences at any point, or wish to withdraw your consent, please email us at merrywalks@btconnect.com.

Contacting us

If you have any queries about the processing of your data our Data Protection Officer can be contacted at merrywalks@btconnect.com.