

# PRIVACY

## Tenant Privacy Notice

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The Bedford Estates strongly believes in protecting your privacy and the confidentiality of your personal information. This notice explains how The Bedford Estates collects, uses and protects personal information in relation to tenancies and is relevant to you if you have enquired about or entered into any of the following:

- Residential, commercial, farm business, leases, licenses or agreements
- Long-leaseholder tenancy
- Leasehold extension
- Event Licenses

It covers what personal data we capture from the point of application, through the course of your tenancy or licence, this includes what you tell us about yourself and what we learn by having you as an occupier and the choices you make about the marketing you want us to send to you. This notice also explains your privacy rights and outlines how the law protects you and notes the limited information we keep about you for our historical records.

We will update this policy regularly in accordance with changes in privacy law (*last reviewed: May 2018.*).

### Who 'We' Are



## THE BEDFORD ESTATES

'We' or 'us' in this notice refers to The Bedford Estates within which our group of businesses operate. There are several data controllers responsible for personal data within our group. Our main privacy notice can be viewed at [www.woburn.co.uk/privacy](http://www.woburn.co.uk/privacy). You can contact us with any questions you may have about privacy and/or data protection. For the purposes of the privacy laws the contact details for the appropriate data controller is as follows. If you are an occupier on the:

### Bloomsbury Estate



## THE BEDFORD ESTATES

Our London property office is managed by Bedford Estates Bloomsbury Limited, 29a Montague Street, London, WC1B 5BL Tel: +44 (0)20 7636 2885 (company no. 10250020; ICO registration ZX307121).

#### Websites

[www.bedfordestates.com](http://www.bedfordestates.com)  
[www.storestreet.co.uk](http://www.storestreet.co.uk)

### Bedfordshire Estate



## WOBURN

The Woburn Estate property office is managed by the 1987 Settlement, The Bedford Estates, Bedford Office, Woburn, Bedfordshire, MK17 9PQ Tel: +44(0)1525 290 333 (company no. 03743508; ICO registration ZA059026).

#### Websites

[www.woburnabbey.co.uk/property](http://www.woburnabbey.co.uk/property)

## Chelsea Wharf



Chelsea Wharf is owned and managed by Bedford Estates Bloomsbury Limited, 29a Montague Street, London, WC1B 5BL Tel: +44 (0)20 7636 2885 (company no. 10250020; ICO registration ZX307121).

Website:

[www.chelseawharf.org](http://www.chelseawharf.org)

Please direct any questions you have in relation to the management of your personal data to the relevant office in the first instance.

### Questions, Concerns & Rights

In the first instance, questions about how we collect, store and use personal data or concerns about how it is managed should be directed to the relevant business.

#### Contact the businesses to:

- Update or rectify inaccurate/incomplete personal data
- Change your marketing & contact preferences
- Object to us using your personal data  
There may be legal or other official reasons why we need to keep or use your data but tell us if you think that we should not be using it.
- You would like us to transfer a copy of your data to another company.  
We are working with our software providers to ensure personal data you give under contract can be made portable.

#### If the business cannot resolve the issue or you require a copy of your personal data please contact the Data Protection Co-ordinator:

- phone: 01525 290 333
- email: [data.protection@woburn.co.uk](mailto:data.protection@woburn.co.uk)
- letter: Data Protection, The Bedford Estates, Bedford Office, Woburn, Milton Keynes MK17 9PQ

If we are still not able to resolve the matter you have the right to lodge a complaint with the Information Commissioner's Office: <https://ico.org.uk/> - they will always direct you to us in the first instance.

#### How the law protects you

As well as our internal Privacy Policy and the procedures we have in place in relation to the handling of personal data, your privacy is protected by law. We are permitted only to use personal information if we have an acceptable reason to do so. This includes sharing it outside The Bedford Estates. The law says we must have one or more of these reasons:

- To fulfil a *contract* we have with you  
We may need to collect personal information by law, or under the terms of a contract we have with you. If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to manage our relationship with you in which case we may have to cancel that service you have with us.
- or when it is our *legal duty*
- or when you *consent* to it

- or when it is in our *legitimate interest*

This is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what it is.

What we use your personal information for	Legal Reason for using your information			
	To enter into & perform a <b>contract</b> eg. lease or maintenance agreement	To comply with <b>legal duty</b>	To pursue <b>legitimate interests</b> of our own or those of third parties	Your <b>consent</b>
<b>Pre-tenancy &amp; tenancy administration</b>				
Making a decision about your application for a tenancy.	X			
Checking you are legally entitled to reside in the UK.		X		
Verifying your identity.	X	X	X	
Determining the terms on which you will be granted tenancy.	X			
Administering the tenancy if we have entered into one with you or your organisation or company.	X			
Making decisions about rent reviews & continued residency.	X	X	X	
Making arrangements for the termination of your tenancy.	X	X	X	
Dealing with any complaints you may have.	X		X	
Complying with our obligations, such as health and safety and others that are relevant.	X	X	X	
Dealing with legal disputes involving you, or other tenants or other residences, including accidents on The Bedford Estates.		X	X	
Notify/invite you, as a tenant, to events we hold.			X	
To detect and prevent fraud, money-laundering and other crimes.		X		
To protect your interests, or the interests of others (such as in the event of criminality such as identity theft, piracy or fraud).		X	X	
To monitor your use of our properties and the communal areas of the estate, and to ensure the security of the estate, including prevent unauthorised access to the estate.	X	X	X	
To administer request for leasehold extensions.	X	X	X	
To collect & recover money owed to us.	X		X	
To exercise our rights set out in agreement or contracts.	X		X	
Marketing communications : Identifying you and telling you about events and activities that we think may be of interest to you & developing marketing activities.  <i>Note: whether you choose to receive marketing communications is entirely up to you. Your choice will not affect your tenancy. You can update your preferences by using the links in any of our emails to you, or by contacting us (see contact details above).</i>				X
<b>Property repair &amp; maintenance</b>				
Making repairs, alterations and improvements to your property	X	X	X	
<b>Business operations</b>				

Efficient and proper estate management, planning, communications, keeping records up to date, benchmarking, accounting and auditing		X	X	
To inform you about The Bedford Estates including news that may be of interest to you as part of the community and events that may be happening on or around The Bedford Estates			X	
To interact and respond to any communications you send us, including social media posts that you tag us in			X	
To let you know about any important changes to our business or policies			X	
To review and improve the performance of our systems, processes and employees (including training)			X	

### Sensitive Data & Criminal

We only process these categories of data with your consent, except where we have a legal obligation or where it is in your vital interests (in relation to health data) ie. where there is a threat to your life.

### Children's Data

This data is collected by Woburn property department only and includes name and date of birth of child.

Examples of where we collect your data from		
From you	When you use our services	From third parties we work with where used
<ul style="list-style-type: none"> <li>When you apply to be a tenant</li> <li>When you talk to us on the phone or in our business offices</li> <li>In correspondence</li> <li>In insurance claims or other documents</li> <li>In financial reviews and interviews</li> <li>In tenant surveys</li> <li>If you take part in our events</li> <li>When you ask us to send you marketing communications</li> </ul>	<ul style="list-style-type: none"> <li>Payment &amp; transaction data</li> <li>When you use our websites or tenant portal (where used)</li> <li>Profile and usage data, including the profile you create to identify yourself when you connect to our internet, mobile and telephone services &amp; data about how you use those services. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software</li> </ul>	<ul style="list-style-type: none"> <li>Agents working on our behalf including property professionals such as estate agents, chartered surveyors, planning consultants, land agents, building contractors, solicitors, managing agents for our properties.</li> <li>Utilities companies</li> <li>Credit reference agencies</li> <li>Debt collection agencies</li> <li>Insurers</li> <li>Solicitors working on your behalf to extend leasehold tenures</li> <li>Public information sources such as Companies House</li> </ul>

Who we share your personal information with	
Within the Bedford Estates	We may share your information with our employees where this is necessary, such as for internal administration purposes and for the purposes of estate management and governance. Your information will only be shared with such employees as are reasonably necessary for these purposes.
With third parties:	<p><i>On our behalf</i></p> <p>We have a number of trusted partners with whom we share your data to deliver our services &amp; undertake services on our behalf. Where we contract a company to undertake a</p>

task for us they are referred to as a third party and we have a contract with them with regards to how your personal data will be handled and to treat it in accordance with the law.

The following activities may be carried out by third-party service providers:

- Letting our properties
- Property Management
- Security
- Providing energy supplies to our properties when tenants leave
- Providing professional advice and support regarding estate management
- Undertaking property compliance requirements
- Undertaking maintenance and repair to our properties
- Collection of debt (debt and tracing agencies)
- Managing events to which tenants are invited
- Undertaking satisfaction surveys
- Webhosting & delivery of mailshots
- Property research for the purposes of planning applications
- If you have a debit, credit or charge card with us, we will share transaction details with companies which help us to provide this service

*Obligation*

We will share your personal information with third parties where we have a statutory obligation

- Local authorities for example for business rates assessment, HMO registration, Council Tax
- HM Revenue & Customs, Tenant’s Deposit Protection Scheme, regulators and other authorities
- If you use direct debits, we will share your data with the Direct Debit scheme.
- If you make an insurance claim, information you give to us or the insurer may be put on a register of claims. This will be shared with other insurers.

*At Your Request*

To companies with which you have asked us to share your data.

*Exceptional Circumstances*

And in exceptional circumstances where we believe that the disclosure is:

- Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings and fraud prevention
- Necessary to protect the safety of our employer, employees, yourself, our property or the public
- Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.

Our property management IT system is provided by Qube Global Software Limited (company number 01656218). We may allow Qube Global Software Limited to access your personal information where it is necessary in order for them to provide this service. This may include preventing or addressing service or technical problems, and dealing with support issues.

**Groups of Personal Information we collect**

We use different kinds of personal information and group them together like this.

Type of personal information	Description

<b>Groups of Personal Information we collect</b>	
We use different kinds of personal information and group them together like this.	
<b>Type of personal information</b>	<b>Description</b>
Contact	Where you live & how to contact you
Transactional	Details about payments to your account with us
Financial	Financial position, status & history
Communications	What we learn about you from letters, emails and conversations between us.
Contractual	Details about products or services we provide to you or are provided to us.
Usage Data	Data about how you use our products and services.
Socio-demographic	Details about your work or profession, nationality & education.
Documentary data	Details about you that are stored in documents in different formats, or copies of them. This could be things like your passport, driver's license or birth certificate.
Social Relationships	Your family, friends & other relationships (for instance when we ask you for next of kin information)
Open Data and Public Records	Details about you that are in public records, such as the Electoral Register, and information about you that is openly available on the internet.
Locational, Behavioural & Technical	The address where you connect a computer to the internet; details about how you use our products and services; details on the devices and technology you use.
Consents	Your marketing preferences and the ways in which you are happy for us to contact you.
Special Types of Data	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic and biometric data</li> <li>• Health data including gender</li> <li>• Criminal convictions and offences</li> </ul>

<b>Schedule of Personal Data</b>	
<b>Reason Collected</b>	<b>How Long We Keep Personal Data</b>
<b>Pre-contract negotiations</b>	If you do not become a tenant or decide you no longer want to take up a tenancy then we will hold your personal information for a maximum of three years; with the exception of commercial tenancies which are retained for 6 years.
<b>Tenancy Documentation</b>	Expired leases (permanently)
	Subletting agreements (permanently)
	Tenant alterations (permanently)
	Tenant correspondence (6yrs)
<b>Leasehold Extension Administration</b>	Permanent (Business Requirement)
<b>Commercial Tenancies</b>	Expired leases (permanently)

	If you provide us with your personal information in relation to a commercial tenancy and you then leave that organisation, and you notify us that you have left or are due to leave we will then remove your contact details and ask you to provide another contact. In all other circumstances we will retain your personal information for 6 years after the end of your tenancy with us.
<b>Payment processing</b>	7 years (Companies Act)
<b>Legal Files</b>	Permanent (Business Requirement)
<b>Marketing Preferences</b>	Until updated (Privacy Laws)
<b>Event Management</b>	6 years (Contract Law)
<b>Surveillance</b>	30days; except Ridgmount, London properties 10 days; 3 years if required for a dispute

The Bedford Estates has a rich archival heritage. For future research purposes which are in the public interest we store permanently but please note that these records remain confidential for a period of 100 years:

- Name
- Dates of residence
- Location of property
- Lease

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#### **How we protect your personal data**

We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this notice. All information you provide to us is stored securely, including in a physically secure environment, on our secure servers. Access to your personal information will be restricted to such staff and other individuals as are necessary for the purposes for which the information was collected. All data is stored within the UK or EU but should any be transferred outside the EEA appropriate safeguards will be in place.