

## GROUP PRIVACY POLICY

The Company\* is committed to being transparent about how it collects and uses the personal data of individuals, and to meeting its data protection obligations. This policy sets out the Company's commitment to data protection, and individual rights and obligations in relation to personal data.

\*Company:

Arcturus Corporation Limited, Blenheims Estate and Asset Management Limited, Blenheims Estate and Asset Management (South West) Limited & Campions Property Letting and Management Limited. Correspondence address: Pembroke House, Torquay Road, Paignton, Devon, TQ3 2EZ.

This policy applies to the personal data of leaseholders, landlords, residents, home owners, tenants, guarantors, individuals acting as relevant persons for the purposes of an AST and any other individual with whom our Company may interact.

The Company has appointed Mrs Hilary Taylor as the person with responsibility for data protection compliance within the Company. She can be contacted at [htaylor@blenheims.co.uk](mailto:htaylor@blenheims.co.uk).

### Definitions

"Personal data" is any information that relates to an individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

"Special categories of personal data" means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

"Criminal records data" means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

"Group" or "Company" means Arcturus Corporation Limited, Blenheims Estate & Asset Management Limited, Blenheims Estate & Asset Management (SW) Limited & Campions Property Letting & Management Limited and any companies that may subsequently form part of the Group.

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## DATA PROTECTION STATEMENT

The Company takes your privacy very seriously and will only use your personal information (including your name, address, contact telephone number(s), email address and bank details) for the purpose of managing our relationship with you and the premises in which you reside as determined in your lease, tenancy agreement or title document or as described in our contract with your Management Company or Freeholder. If you are acting as a Guarantor or as a Relevant Person for the purposes of an Assured Shorthold Tenancy (AST) your details will be treated in the same manner. Our lawful basis for processing your data is the contract we have with you or with your Management Company or Freeholder.

### SUPPLYING YOUR INFORMATION:

Your information is generally supplied to us by you either online or on paper. There are several exceptions to this, which are detailed below:

- Where you are purchasing a property in a building or estate that we manage it may be supplied by your solicitor and is then verified by the Company writing to you.
- When you are acting as a Guarantor or a Relevant Person for the purposes of an AST your details will be supplied by the prospective tenant on the understanding that they have your permission to do so.
- You are identified by a prospective tenant seeking to enter into an AST as their Next of Kin
- If you are a tenant in a property managed by Blenheims or Blenheims (SW) your details will be supplied by the homeowner or leaseholder on the understanding that they have your permission to do so and to allow us to contact you should the need arise when fulfilling the obligations of our contract.

Failure to supply correct contact details will result in us and your Board of Directors/ RMC/ Freeholder/ Landlord being unable to contact you with important information regarding your property or tenancy. This may in turn lead to us being unable to collect your Service Charge or other fees as laid out in your lease, tenancy agreement or title document, which could result in legal action.

### *Campions only:*

In order to fulfil our responsibilities to landlords and tenants, additional personal information is required for clients of Campions, which includes the information detailed below.

**Landlord:** name; email address; telephone number(s); date of birth; address & previous addresses; marital status; NI Number (or equivalent); passport information; nationality; next of kin; proof of ownership of property; bank account details; tax information required by HMRC; NRL information (if applicable)

**Tenant:** name; email address; telephone number(s); date of birth; address & previous addresses; marital status; NI Number (or equivalent); passport information; nationality; next of kin; employment status & employer; income and salary information; name of university or college at which you study; bank account details; details of any welfare benefits to which you may be entitled or are currently receiving; referencing information provided to us by the referencing agency currently in use to determine affordability and suitability

**Guarantor:** name; email address; telephone number(s); date of birth; address & previous addresses; marital status; NI Number (or equivalent); passport information; nationality; next of kin; employment status & employer; income and salary information; referencing information provided to us by the referencing agency currently in use to determine affordability and suitability

Details relating to the Property address, term of tenancy, rent amount and payment frequency, deposit, utility & service responsibilities will also be held.

## UPDATING YOUR INFORMATION:

It is your responsibility to ensure that we hold the most up to date contact information for you in order that we may fulfil our obligations. You should advise us as soon as reasonably possible of any changes to your contact details in writing to the office with which you normally interact.

## SHARING YOUR INFORMATION:

Your information will never be passed on or sold to any third party outside the Group for the purposes of marketing activity

We may from time to time share your information with others for the purpose of managing your relationship with us and fulfilling our contractual obligations. These parties may include:

- Contractors
- Utility Companies and Billing Agents
- Credit reference or referencing agencies (Campions only)
- Your premises' Insurer
- Your premises' Landlord or Freeholder
- Your premises' Board of Directors or RMC
- Other companies for the purposes of fraud prevention and debt collection
- Any future purchaser of the Company in the event that there is a change of ownership

## DATA SECURITY

When you supply your personal information to us we take steps to ensure that it is kept secure and safe. We have internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

Electronic information is stored in password protected software and on our secure servers. Physical information (such as: forms you may fill in and send to us; tenancy agreements; and Guarantor agreements) are stored in locked cabinets in our offices. Hard copies of information are periodically sent to a secure archive facility.

Where we engage third parties to process personal data on our behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data. They are also bound by the Data Protection Act.

## DATA RETENTION

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity or as required by law, or as set out in any relevant contract we have with you. Where practical, all information will be destroyed with seven years of the expiry of our relationship with you.

## INTERNATIONAL DATA TRANSFERS

The Company will not transfer personal data to countries outside the EEA.

## DATA BREACHES

If we discover that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals, we will report it to the Information Commissioner within 72 hours of discovery. We will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, we will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures we have taken.

## YOUR RIGHTS

You have the right at any time to:

- Ask us for a copy of the information we hold about you via a Subject Access Request (SAR)
- Require us to correct any inaccuracies
- Make a request to us that we delete any personal data we hold
- Object to receiving any marketing communications from us

To make a SAR or to exercise any of these rights, please email our Data Protection Officer, Hilary Taylor on [htaylor@blenheims.co.uk](mailto:htaylor@blenheims.co.uk). In some cases, we may need to ask for proof of identification before the request can be processed. We will inform you if you need to verify your identity and any documentation we require to facilitate your request.

## CONTACTING US

Do not hesitate to contact us via Hilary Taylor, our Data Protection Officer, if you have any questions regarding this policy and the information we hold about you or if you would like to make a complaint regarding the manner in which your information has been used.

By Email: [htaylor@blenheims.co.uk](mailto:htaylor@blenheims.co.uk)

By Post: Mrs H Taylor  
Arcturus Corporation Limited  
Pembroke House  
Torquay Road  
Paignton  
Devon  
TQ3 2EZ

While we would request that you raise any complaints with us initially, you also have the right to complain to the Information Commissioner's Office in relation to the use of your data. Their contact details are below:

By Post: Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

By Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)