

## PRIVACY NOTICE

### Welcome!

This privacy notice contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and what to do in the event you have a complaint.

This notice sets out how we may use your personal data, in respect of facilitating any commercial and / or financial relationship that we may have or be seeking to have with you.

If you have any questions about this privacy notice, please contact our Data Protection Manager at;

**Email:** info@cityblockgroup.co.uk

**Tel:** 01524 541 251; or

**Write to:** Data Protection Manager, CityBlock, 21 Castle Hill, Lancaster, LA1 1YN

### 1. Who are we

We are CityBlock Ltd, registered company no. 05704241, of 21 Castle Hill, Lancaster, Lancashire, LA1 1YN.

As a Data Controller, we collect, use and are responsible for obtaining and processing certain personal information about you. When we do so, we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom).

### 2. Data Protection Principles

We will comply with data protection law. This means that the personal information that we hold about you must be;

- a. Used lawfully, fairly and in a transparent way.
- b. Collected only for valid purposes that we have clearly explained to you, and not used in any way that is not compatible with those purposes.
- c. Relevant to the purposes we have told you about and limited only to those purposes.
- d. Accurate and kept up to date.
- e. Kept only as long as necessary for the purposes we have told you about.
- f. Kept securely.

### 3. The personal information we collect and use

#### (a) Information collected by us from you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect the following personal information when you provide it to us.

- Your name
- Your contact details – consisting of telephone number and email address
- Your current address
- Your bank details

“Special categories” of sensitive personal information require higher levels of protection.

Special category data is personal information regarding an individual's:

- race;
- ethnic origin;
- politics;
- religion;
- trade union membership;
- genetics;
- biometrics (where used for ID purposes);
- health;
- sex life; or
- sexual orientation.

To clarify, we do not collect Special category data about you.

When you interact with our digital platforms, we may also automatically collect the following information about your visit:

- Information collected in any subscriptions to our website services, email notifications and / or newsletters;

You can opt out of any marketing communication from us by selecting the opt-out option on any of our communications.

### **(b) How we may use your personal information**

We will use your personal data to facilitate the provision and management of our relationship with you and to operate our side of any contract that we may have with you.

We may use your personal information for the following purposes:

- Entering into discussions / negotiations with a view to establishing a commercial and / or financial relationship
- To facilitate and set up payments
- To communicate news, offers, marketing communications and opportunities from us.
- To enter into business partner – sales and purchases
- To facilitate joint venture funding
- To deliver our obligations under a facility and or managed services agreement
- To deliver our obligations under a joint venture partner agreement

### (c) Who we may share your personal information with

We may share your personal data with third parties, including third-party service providers, in order to facilitate any commercial and / or financial relationship that we may have with you.

Such third parties may include;

- IT maintenance and support provider
- Solicitors
- Accounting providers
- Regulatory bodies i.e. HMRC
- Banks

We may also share your data with third parties in the following circumstances;

- (a) if we are under a legal or regulatory duty to do so;
- (b) if it is necessary to do so to enforce our contractual rights;
- (c) to lawfully assist the police or security services with the prevention and detection of crime or terrorist activity;
- (d) where such disclosure is necessary to protect the safety or security of any persons and/or;
- (e) otherwise as permitted under applicable law.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may share personal data with the following third parties, all of whom form part of the CityBlock Group of companies:

- CityBlock Holdings Limited – company number: 04450448
- CityBlock (Lancaster 4) Limited – company number: 07768909
- CityBlock Letting Lancaster 4 Limited – company number: 10378850
- CityBlock Reading Limited – company number: 10073989
- CityBlock Lettings (Reading) Limited – company number: 10814024
- CityBlock Lettings Limited – company number: 04449707
- City Portfolio Limited – company number: 06307552

## 4. Cookies

We use cookies on our website which amongst other things, help us to improve your experience of our website and to ensure that it performs as you expect it to. A cookie consists of information sent by a web server to a web browser, and is stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may use “session” cookies on the website. We will use the session cookies to anonymously keep track of your browser whilst you navigate the website. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users’ computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google’s privacy policy is available at: <http://www.google.com/privacypolicy.html>.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking “Tools”, “Internet Options”, “Privacy”, and selecting “Block all cookies” using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites.

### 5. How long your personal information will be kept

We will retain your data for as long as is reasonably necessary to facilitate any arrangement / agreement that we may have with you. It will not be retained indefinitely or for reasons incompatible with relevant data protection legislation, including the General Data Protection Regulation.

### 6. Reasons we can collect and use your personal information

We rely on the following lawful bases on which we collect and use your personal data, set out in the below table;

<b>Purpose / activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
Entering into discussions / negotiations with a view to establishing a commercial and / or financial relationship	(a) Name (b) Contact details	(a) Legitimate interest (it may be in the interest of only one of all parties to enter into such negotiations).
Performance under Joint Venture Partner Agreement	(c) Name (d) Contact details (e) Bank details	(a) Contractual obligation (b) Legitimate interest (it is all parties’ interest to perform under the agreement).
Joint Venture Funding Agreement / Facility Agreement	(a) Name (b) Contact details (c) Bank details	(a) Contractual obligation (b) Legitimate interest (the joint venture agreement has been formed in both parties interests).

Business Partner-Sales and Purchase	(a) Name (b) Contact details (c) Bank details	a) Legitimate interest (it is in the interest of the business partner and CityBlock to allow for sales and purchases to occur). b) Contractual obligation
Processing Invoices	(a) Name (b) Contact details (c) Bank details	(a) Contractual obligation (b) Legitimate Interest (it is in the third party's interest to receive payment and in the interest of CityBlock to make payment).

## 7. Sharing of your information outside of the EEA

We will not share your personal data outside of the EEA.

## 8. Your rights

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your personal information;
- access to your personal information and to certain other supplementary information that this privacy notice is already designed to address;
- require us to correct any mistakes in your information which we hold (it is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the course of your relationship with us);
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information;

- otherwise restrict our processing of your personal information in certain circumstances;
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individual's rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please make contact with us as per the details set out at the top of this privacy notice, and in doing so:

- let us have enough information to identify you;
- let us have proof of your identity and address (e.g. a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

## 9. Keeping your personal information secure

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

We also have procedures in place 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.

## 10. How to complain

We hope that we can resolve any query or concern you raise about our use of your personal data however, in the event you wish to make a complaint to CityBlock, please refer to our contact details provided at the top of this privacy notice.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, live or where any alleged infringement of data protection laws occurred.

If you are not satisfied with the outcome of your complaint, the supervisory authority in the UK is the Information Commissioner who may be contacted by the following link; <https://ico.org.uk/global/contact-us/>, or at the following address;

Information Commissioner's Office

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### **11. Changes to this privacy notice**

We want you to feel reassured in respect of how we handle your personal data, and so, we aim to meet high standards and so our policies and processes are subject to review.

We reserve the right to change this notice as and when required and in doing so, we will inform you, usually by email, and / or by publishing the updated content to our website: <https://www.cityblockgroup.co.uk/>

### **12. Do you need extra help?**

If you would like this notice in another format (for example: audio, large print, braille), or a different language, or if you require any further details, please contact us as per the contact details at the top of this privacy notice.

**Thank you for taking the time to read this notice.**