

Tor Bryan (Residents) Ltd Privacy Statement

This Privacy Statement tells you about processing of “personal data” by Tor Bryan (Residents) Ltd (‘the company’).

We may hold and process your personal data in order to provide services to you as residents of the Tor Bryan estate, and in order to contact you in your capacity as shareholders of and holders of covenants with Tor Bryan (Residents) Ltd. When providing the services we are “data controllers” of your personal data. We are committed to processing all personal data fairly, lawfully, and transparently.

To make things simpler, we have nominated one data controller, the company secretary of Tor Bryan (Residents) Ltd, to handle all requests or queries you might have about our processing of your personal data. The company secretary has also been appointed as Data Protection Officer to oversee compliance with data protection law. Currently he is Kevin Wheeler at 10 Tor Bryan whose contact details are secretary@torbryanestate.co.uk

You have various legal rights in your personal data including the right of: information and access to your data, including a “portable” copy of your data; erasure and rectification of your data; and rights to restrict or object to processing of your personal data. Where we rely on your consent to process your personal data you can withdraw that consent at any time. To exercise these data subject rights please contact the following email address: secretary@torbryanestate.co.uk

The data we generally hold and process includes your name, address, phone number and email address. This personal data is held only for the purposes of performing (or arranging) services to you as residents of the estate, or contacting you as shareholders of and holders of covenants with Tor Bryan (Residents) Ltd.

Our lawful bases for processing personal data include:

- where you have given us your consent, we rely on that consent, including your explicit consent to publish special category personal data;
- where you are party to a contract (such as the covenants in place between the company and residents), and that contract requires your personal data to be processed;
- where we may have legal obligations that mean we have to process personal data (such as maintaining a register of shareholders).
- Where that data is of legitimate interest to the company

Sharing your personal data

This section provides information about the third parties with whom the company may share your personal data.

These third parties have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary): suppliers of services to the estate, utility companies and contractors.

For example, where utility companies need to perform work on the estate, we may need to inform them (and you) of the addresses being affected.

In addition the local neighbourhood watch coordinator makes use of your email addresses to provide you with regular updates (if you wish to opt out of these updates please contact the Data Protection Officer).

How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is currently best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information.

The company is also obliged to hold a register of shareholders, and minutes of shareholder meetings. We may have legal obligations to retain some data in connection with covenants in place with residents or in relation to planning consent applications.

In general, we will endeavor to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

Your rights and your personal data

You have the following rights with respect to your personal data: When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1) The right to access personal data we hold on you

a. At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month.

2) The right to correct and update the personal data we hold on you

a. If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

3) The right to have your personal data erased:

a. If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.

b. When we receive your request we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).

4) The right to object to processing of your personal data or to restrict it to certain purposes only

a. You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.

5) The right to data portability

a. You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

6) The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained

a. You can withdraw your consent easily by email, or by post (see Contact Details above).

7) The right to lodge a complaint with the Information Commissioner's Office.

a. You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.