

MAX BARNEY LTD PRIVACY POLICY

Max Barney Ltd ("**Max Barney**" / "**we**" / "**our**" / "**us**") is committed to protecting and respecting your privacy. This policy explains how we, and companies owned or managed by us, process any personal data that we collect from you, or that you provide to us, in connection with your tenancy, when using this website, when providing services to us or otherwise interacting with us.

Please read the following carefully to understand how we will treat your personal data.

1. ABOUT US

Max Barney Ltd, a company registered in England under company number 09496464, manages The Max Barney Estate and is the data controller in respect of your personal data. As data controller, we are responsible for deciding how we hold and use personal data about you. Our registered office is at Fourth Floor, 168 Shoreditch High Street, London, E1 6HU.

2. WHAT INFORMATION WE COLLECT AND HOW WE WILL USE IT

2.1 We collect personal data so that we can operate effectively and provide you with the best possible service. The information we collect depends on the context of your interactions with us and how you use our services. It also depends on the choices you make. You may choose not to provide certain information but if you do, and that information is necessary to provide a particular service, then you may not be able to use that service. We will only use your personal data where we have a valid lawful basis to do so.

2.2 The table below summarises what information we collect about you, how we intend to use it and our legal basis for using it.

2.3 The following definitions apply to the categories of personal data referred to in the table:

- (a) **Contact:** name, title, address, email address, phone number;
- (b) **Identity:** name, username, date of birth, photographs;
- (c) **Financial:** bank account details;
- (d) **Transactional:** information including details of payments made to and received from you;
- (e) **Technical:** IP (internet protocol) address, time zone setting and location, browser plug-in types and versions, operating system and platform data, relating to the devices you use to access the website;
- (f) **Usage:** information relating to how you use the website; and
- (g) **Wireless:** device names, unique identifiers and time and date information.

<i>What information will we collect about you?</i>	<i>Purposes for which we may use your personal information</i>	<i>What is our legal basis for processing information about you?</i>
Tenants / occupiers of our properties		
Contact Identity Financial	Determining the terms of the tenancy / occupational arrangement with you.	Necessary to take steps at your request prior to entering into a contract.

Contact Identity	<p>Registering you as a new occupier of one of our properties, which may include:</p> <ul style="list-style-type: none"> • providing your details to any managing agent who might be acting on our behalf; • pre-tenancy checks, including credit checks and checks to confirm that you are legally entitled to reside in the UK. 	<p>Necessary to take steps at your request prior to entering into a contract.</p> <p>To enable us to comply with our legal obligations.</p>
Contact Identity Financial Transactional	<p>Ongoing management of your tenancy / occupation, including in relation to:</p> <ul style="list-style-type: none"> • rent reviews; • repairs, alterations and improvements to the property which you are occupying; • decision making regarding your continued occupation of one of our properties. 	<p>Performance of a contract with you.</p> <p>In order to pursue our legitimate interest to manage our property and our business.</p>
Contact Identity	<p>Complying with our health and safety obligations</p>	<p>Performance of a contract with you.</p> <p>To enable us to comply with our legal obligations.</p> <p>In order to pursue our legitimate interest to ensure the safety of our properties.</p>
Contact Identity	<p>Managing our relationship with you, including responding to any queries or complaints and updating you as to any changes to our terms and conditions or policies.</p>	<p>Performance of a contract with you.</p> <p>To enable us to comply with our legal obligations.</p> <p>In order to pursue our legitimate interest to manage the operation of our business and liaise with our customers.</p>
Contact Identity	<p>Terminating your tenancy or other occupation of one of our properties.</p>	<p>Performance of a contract with you.</p> <p>In order to pursue our legitimate interest to protect our legal rights and manage our contractual relationships.</p>
Contact Identity Financial Transactional	<p>Dealing with any legal disputes in which you or other tenants or neighbours are involved.</p>	<p>Performance of a contract with you.</p> <p>To enable us to comply with our legal obligations.</p> <p>In order to pursue our legitimate interest to protect our legal rights and those of our customers.</p>
Contact Identity Financial Transactional	<p>Processing financial transactions relating to our business relationship, including collecting, processing or recovering money owed to us and managing any payments or charges relating to your account.</p>	<p>Performance of a contract with you.</p> <p>In order to pursue our legitimate interest to maintain business records.</p>

Contact Identity	Maintaining a record of those visiting / attending properties within our portfolio.	In order to pursue our legitimate interest to maintain security at our properties.
Contact Identity Technical	Administering, managing and protecting the companies managed by the Max Barney Estate, including: <ul style="list-style-type: none"> • hosting data; • providing IT, administrative and other business services. 	To enable us to pursue our legitimate interests to: <ul style="list-style-type: none"> • deliver and improve our services; and • maintain the security of our computer systems.
Identity Financial	Planning and carrying out corporate reorganisations.	To enable us to pursue our legitimate interests to restructure our business and our group.
Contact Identity Financial Transactional	Detection and preventing crime, including but not limited to fraud and money laundering.	To enable us to comply with our legal obligations. To enable us to pursue our legitimate interests to protect our business from crime.
Identity Contact Technical Usage Wireless	To enable access to our WiFi services at our properties and to protect our network.	To enable us to pursue our legitimate interests to provide WiFi services and to protect our network security.
Occupiers of properties that neighbour our properties		
Contact Identity Financial	In order to resolve any issue, deal with any legal disputes or notify you of any works to our property which may affect you.	To enable us to comply with our legal obligations. To enable us to pursue our legitimate interests to protect our properties, our legal rights and those of our customers.
Contractors, Suppliers, Service Providers and Professional Advisers		
Contact Identity Financial Transactional Wireless / Usage data	To negotiate and contract with you or your employer for the supply of goods and services. To resolve any business or contractual issues and deal with any legal disputes.	To enable us to pursue our legitimate interest to purchase goods and services and protect our legal rights.
Website Users		
Contact Identity Usage Technical	Maintaining our website (including system maintenance, testing, support), monitoring its effectiveness and using data analytics in order to ensure that our	In order to pursue our legitimate interests to: <ul style="list-style-type: none"> • understand how our site is used; • improve user experience of our site;

	<p>website is most relevant to you, the user.</p> <p>Protecting the security of our website and preventing fraud.</p>	<ul style="list-style-type: none"> • maintain the security of our computer site; and • protect our website, our business and our legal rights.
Cookies and similar technology	To analyse the traffic to our website	Consent
Users of our Referral Scheme		
<p>Contact Identity Financial Transactional</p> <p>(Of both the referrer and the referee)</p>	<p>To manage the referral scheme for new customers operated via our website.</p> <p>To assess the eligibility of referrers and calculate payments due under the scheme.</p>	<p>In order to pursue our legitimate interests to:</p> <ul style="list-style-type: none"> • operate the referral scheme; • market our business; and • protect our rights.
Marketing Contacts		
Contact Identity	To send you marketing communications. For further information, see paragraph 7.6(b) of this policy below.	<p>In order to pursue our legitimate interest to promote our business (where we send marketing communications to your business address).</p> <p>Consent (where we send marketing communications to your personal address).</p>

2.4 We have a duty to process personal data fairly, lawfully and in a manner that you would expect given the nature of our relationship with you. Where we have a legal basis to use your personal data without consent (as set out in the table above), this policy fulfils that duty by giving you appropriate notice and explanation of the ways in which your personal data will be used.

2.5 If you have any questions or require any further information regarding our use of your personal data please contact us (see paragraph 11 below).

3. CHANGE OF PURPOSE

We will only use your personal data 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 the original purpose. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. SHARING YOUR INFORMATION

4.1 You acknowledge that we may share your personal data, with your consent or as necessary, with selected third party service providers and other companies managed by us, which support us in the performance of the activities set out in the table above. For example, when you make a payment, we will share payment information with banks and other entities that process payment transactions.

- 4.2 We may also share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or otherwise to comply with the law.
- 4.3 We require all our third party service providers and all other companies managed by us to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes in accordance with our instructions.
- 4.4 The third parties with whom we may share your data include:
- (a) managing agents;
 - (b) surveyors, including rent review surveyors, and valuers;
 - (c) solicitors;
 - (d) debt collection agencies;
 - (e) credit reference agencies;
 - (f) banks;
 - (g) contractors undertaking works to the estate;
 - (h) providers of IT / technical solutions;
 - (i) estate agents;
 - (j) auctioneers;
 - (k) auditors;
 - (l) analytics and search engine providers; and
 - (m) other service providers.

5. STORING YOUR INFORMATION

- 5.1 The personal data that we hold about you will be processed and stored within the United Kingdom. In the unlikely event that your personal data were to be transferred outside the UK and European Economic Area (EEA) for processing or storage, we will take all reasonable steps to protect your data and will do so in a way consistent with EU and UK laws on data protection.
- 5.2 We will only retain your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting obligations. For example, we may need to retain some of your personal data for 6 years after you have made a purchase from us for legal reasons.

6. KEEPING YOUR INFORMATION SECURE

- 6.1 All information that you provide to us is stored on secure servers. We have put in place appropriate measures to protect the security of your information.
- 6.2 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 the information transmitted to our site and you acknowledge that any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access or inadvertent disclosure.

7. YOUR RIGHTS

- 7.1 You have the right under data protection laws to access information held about you, subject to certain conditions, and to request its correction or deletion.
- 7.2 If you would like to access, update or amend the information which we hold about you, if you would like to exercise any of the rights outlined below or if you would like us to stop using your personal data, please contact reception@maxbarney.com.
- 7.3 By law you have the following rights in relation to your personal data:
- (a) Right to request access to your personal data (via a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. This right is subject to a number of exemptions that allow information to be withheld in certain circumstances, e.g. where compliance would involve disclosing another individual's personal data, information that is subject to legal professional privilege or confidential references;
 - (b) Right to request correction or deletion of your personal data (unless we have the legal right to retain it). You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below);
 - (c) Right to object to the processing of your personal data where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes;
 - (d) Right to request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it;
 - (e) Right to request the transfer of your personal data to another party; and
 - (f) Right to change your data processing preferences at any time. To update your preferences, please contact us at reception@maxbarney.com or see paragraph 8 in the event that you have received marketing communications.
- 7.4 Please note that if you ask us to either stop processing your personal data in a certain way or erase your personal data, and this type of processing or data is needed to facilitate your use of our services or our website, you may not be able to use our services or our website as you did before. Your right to object to direct marketing, can, however, be exercised at any time without restriction.
- 7.5 In the limited circumstances where we are relying on your consent as the legal basis to process your personal data for a particular purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us. Once we know that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
- 7.6 In relation to any request you may make regarding your personal data or exercising your rights:
- (a) You will not have to pay a fee to access your personal data or to exercise any of the other rights. However, if your request for access is manifestly unfounded or excessive, we may charge a reasonable fee or refuse to comply with the request.

- (b) We will require you to provide us with sufficient information to allow us to confirm your identity. This is a security measure to ensure that we are not disclosing personal data to a person with no right to receive it.

8. MARKETING

- 8.1 We may send you information (including, for example, promotional materials and newsletters) by email about our services and those of other companies in our group that may be of interest to you. We will only do this if you have consented or we have another legal basis for doing so.
- 8.2 You have the right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, you can click on the “unsubscribe” link at the bottom of our marketing messages or contact us at reception@maxbarney.com.

9. OTHER WEBSITES

Our website contains links to other websites. This privacy policy only applies to our website. When you link to other websites, you should read their privacy policies.

10. CHANGES TO THIS PRIVACY POLICY

We keep our privacy policy under regular review and will post any updates on our website. This privacy policy was last updated in June 2020.

11. HOW TO CONTACT US AND COMPLAINTS

- 11.1 If you have any questions about this privacy policy or how we handle your personal data, please contact us at reception@maxbarney.com.
- 11.2 If for any reason you are not happy with the way that we have handled your personal data, please contact us. If you are still not happy, you have the right to make a complaint to the Information Commissioner’s Office (see: <https://ico.org.uk/global/contact-us/>).