

St Paul's Court Ltd – Privacy Statement

September 2022

We take your privacy and the security of your personal information very seriously. This statement of our policy sets out our approach to safeguarding the privacy of the personal information we hold.

St Paul's Court Ltd is responsible for collecting, processing, storing and safe-keeping personal and other information as part of our business activities. We manage personal information in accordance with the UK General Data Protection Regulation ('UK GDPR') and the Data Protection Act 2018. We are registered (registration number: ZA594966) as data controllers with the Information Commissioner's Office.

This privacy statement applies to St Paul's Court Ltd.

About the personal information we collect

The information we may collect about you could include but may not be limited to:

- Your name
- Your date of birth
- Your address
- Your contact details (phone/mobile/email)
- Other personal information you provide us with when completing online or other forms for us
- Details of any transactions you carry out through our site
- Details of the fulfillment of any orders you place with us or services we provide to you
- Any correspondence you may have with us by letter, email, phone or online
- Responses which you choose to give to any surveys which we make
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data
- Details of any resources that you access on our site
- Your racial or ethnic origins
- Your physical or mental health condition
- Photographs and CCTV images of you.

We will not collect information about you that we do not need, and we will ensure that the personal information we collect is updated to our systems in a timely and accurate manner.

We may apply markers to your information (for example, in relation to your vulnerability or health status) to enable us to tailor and deliver services to you.

How we use your personal information

We collect and use personal information for the following purposes:

- To respond to your enquiries, to provide you with services, information and products that you request from us and to manage your relationship with us.
- For technical administration, research and development, customer administration, marketing and to identify areas where we can improve the services we provide.

- To carry out our obligations arising from any contracts entered into between you and us.
- To maintain our organisational records.
- To allow you to participate in interactive features of our service when you choose to do so.
- To notify you about changes to our service.
- To allow you to participate in the St. Paul's Court community if you want to.
- Where you are a member of our staff or Board Member, for the purposes of the proper administration and management of our organisation.
- To ensure that content from our site is presented in the most effective manner for you and for your computer.

We will regularly review the personal information we hold about you and make changes to any service or information-handling processes when the law or the Information Commissioner require such changes.

Our approach to collecting, storing and using personal information

The UK GDPR requires us to have a lawful basis for any use we make of personal information. Most commonly we use your personal data in reliance on one or more of the following lawful bases:

- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to perform a contract we are about to enter into or have entered into with you.
- Where we need to comply with with a legal or regulatory obligation.

Your personal information is stored securely with access restricted and security principles applied through access control. Your personal information will not be shared with third parties unless agreed separately with you. All personal data is normally kept for 12 months after the conclusion of your involvement with St Paul's Court. You will be informed of any changes in our approach to retention of your personal information at the time you hand over your personal information.

When you visit our website we collect standard internet log information for statistical purposes.

- We use cookies to collect information in an anonymous way, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.
- We do not attempt to identify visitors to our websites. We do not associate information gathered from our sites with personally identifying information from any source.
- When we collect personal information, for example via an online form, we will explain what we intend to do with it.

Our websites contain links to various third-party websites. We are not responsible for the content or privacy practices of any external websites that are linked from our sites.

Applying to work at St Paul's Court Ltd

If you submit an application to work for St Paul's Court Ltd, whether on a paid or voluntary basis, we will use your personal information to process your application and to produce and monitor recruitment statistics. We will not take up references without your prior permission. We will not share or disclose your information unless you have given us your consent, or we are required to by law. Where we are required to carry out a Disclosure and Barring Service check we will comply with the law and your rights when carrying out these checks.

We retain personal information relating to unsuccessful applicants for no longer than 12 months, for use in the event of an appeal. We produce statistical information to assist with recruitment analysis.

How we share your personal information

We will not normally share your information without your consent unless we are required to by law. We may seek your consent directly or may obtain it by telling you about how your information may be used at the time you provide information or enter into a contract with us.

Our legal obligations

We will share specific and relevant information with law enforcement and government agencies or public bodies where we are legally required to do so. Examples may include:

- The prevention or detection of crime and fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax or duty owed to customs and excise
- Sharing in connection with legal proceedings
- Sharing in relation to the physical or mental health of an individual, where disclosure is required to protect them or others from serious harm
- Research and statistical purposes

Sharing information with our partners

In some areas we may enter into partnerships with other organisations such as local authorities and the police. For example, we may join a partnership to help prevent and control anti-social behaviour. In order to protect any personal information which you and other individuals have consented for us to share with such a partner organisation, we will enter into a data sharing agreement before any sharing takes place with the partner organisation.

Sharing information with our contractors and suppliers

There are some cases when we will share your information to support legitimate business purposes. We do this to ensure that we can meet your needs, and also to meet our health and safety obligations towards those delivering services on our behalf. This may include sharing information with our contractors and suppliers to enable them to carry out duties on our behalf or to meet contractual obligations we may have.

Keeping your information secure

We store personal information both electronically and in paper form.

We implement security policies, processes, and technical security solutions to protect the personal information we hold from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

When you contact us, we may ask you to provide us with some information so that we can confirm your identity. If other people (e.g. family members, support workers, solicitors) act on your behalf we will take steps to ensure that you have agreed for them to do so. This may include asking them to provide us with supporting information to indicate your consent. We do this to protect you and to make sure that other people cannot find things out about you that they are not entitled to know.

Staff members and third parties who have access to, or are associated with the processing of, your personal information and are obliged to make reasonable efforts to safeguard it.

How we use your telephone number

Contact via telephone provide a direct way to contact and share information with you about the services we can deliver to you.

We may use your telephone number that you have provided us to keep in contact with you by text. When we send SMS/text messages, there may be someone in your household who may read the message before you are able to. You may like to inform the people who live with you that you may receive text messages from time to time.

Operational SMS/text messaging and calls

If you supply us with your telephone contact details, we may use them to call or send you operational SMS/text messages.

Examples of operational SMS/text messages include:

- Sending a reminder about an appointment
- Asking you to contact a named person

You cannot opt-out of the use of your telephone numbers for operational purposes.

Sharing your telephone number with third parties

We may pass your telephone number to third parties so that we can meet our contractual obligations with you. We may also share your telephone numbers if we are required to by law. In doing so we will comply with the UK GDPR.

We may supply the details to our approved marketing or third-party contractors who are delivering or performing services on our behalf, and these companies must not use your information for any other purpose. We never share or sell your telephone numbers telesales/marketing companies.

Contacting us about your personal information

We will be as open as possible with you about the personal information we hold about you, and if something is wrong, we want to work with you to put it right. Contact the Estate Office, Management Suite, St Paul's Court, W14 9YA, estateoffice@stpaulscourt.co.uk, 020 8741 0125.

Finding out about the personal information we hold about you

You have the right to find out whether we are keeping personal information about you. To do this, please contact the Estate Office.

Telling us about changes to your personal information

You have the right to have inaccurate/outdated personal information amended, deleted, or destroyed. If any of your circumstances change, please contact our Estate Office.

Requesting a copy of your personal information

As part of our service to you, we are happy to provide you with copies of specific documents upon request on an informal basis. If you want to make a larger or more comprehensive request, you have the right to do this by making a formal 'subject access request'.

If you make a subject access request, we will provide you with a readable copy of the personal information we hold about you. To make a subject access request you must:

- Make your request in writing to the Estate Office; and
- Provide proof of your identity.

Your other rights

The UK GDPR also gives you a number of other rights in relation to your personal information. You can find out about your rights, and get further guidance on the ICO website.

Questions and complaints

If you have a concern about any personal information we may hold about you, or how we use it, we will do our best to help. Please contact our Estate Office.

If, after contacting us, you are still not satisfied you can complain to the Information Commissioner. You also have the right to apply to the Court for compensation for distress and/or damages due for non-compliance with UK GDPR and the Data Protection Act 2018.

Keeping this statement updated

We keep our privacy statement under regular review. This privacy notice was last updated in September 2022.