

# CONSENSUS BUSINESS GROUP

## Privacy Statement

### 1. IMPORTANT INFORMATION

#### Introduction

This Privacy Statement contains important information about what personal data we collect; what we do with that information; with whom we may share it and why; and your choices and rights when it comes to the personal information we hold about you.

We may need to make changes to our Privacy Statement over time, so please check our website ([www.consensusbusiness.com](http://www.consensusbusiness.com)) for updates from time to time.

This version of our Privacy Statement was last updated on 24 May 2018.

#### Who are we?

Vincos Limited, trading as Consensus Business Group ("**CBG**"). Registered in England and Wales, Registered Office: Leconfield House, Curzon Street, London W1J 5JA; Company Number 04285055.

Consensus Business Group is a trading name for a group of companies which are owned by the trustees of the Tchenguiz Family Trust. Amongst other things, Consensus Business Group holds and manages a portfolio of over 300,000 residential freeholds (the "**Portfolio**"). This privacy statement sets out the basis on which we hold, process and share personal data relating to the Portfolio.

We respect your privacy and are committed to protecting your personal data. This privacy statement will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

#### Purpose of this privacy statement

This privacy statement aims to give you information on how we collect and process personal data relating to the Portfolio, including any data you may provide in your dealings with us.

#### Controller

This privacy statement is issued on behalf of Vincos Limited, so when we mention "CBG", "we", "us" or "our" in this privacy statement, we are referring to Vincos Limited.

We have appointed a data privacy manager (DPM) who is responsible for overseeing questions in relation to this privacy statement and compliance under the GDPR generally. If you have any questions about this privacy statement, including any requests to exercise your legal rights, please contact the DPM using the details set out below.

## **Contact details**

Our contact details are:

Jamie Drinnan  
Data Privacy Manager  
Consensus Business Group  
35 Park Lane  
London W1K 1RB

Email: [j.drinnan@cbg.uk.com](mailto:j.drinnan@cbg.uk.com)

## **Whose data do we hold?**

We may hold data about the following categories of people:

- Tenants of the residential freehold portfolio
- Advisers, consultants and other professional experts
- Suppliers and service providers
- Contractual counterparties
- Complainants and enquirers

## **Right to Complain to ICO**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). Accordingly, if you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you can contact the ICO on 0303 123 1113 or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

## **2. THE DATA WE COLLECT ABOUT 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, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** includes first name, maiden name, last name, marital status, title, date of birth and gender.
- **Contact Data:** includes address, email address and telephone numbers.
- **Interaction Data:** includes information about, and the content of, your contacts with us e.g. meetings, phone calls, emails / letters.
- **Financial Data:** includes payments made pursuant to a contract between us and bank account details.

In limited circumstances, we may also collect Special Categories of Personal Data about you (this could include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). This information will only be collected and used where it is necessary to comply with our legal obligations.

#### **If you fail to provide personal data**

Where we need to collect personal data by law or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we will notify you at the time.

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Identity, Contact, Interaction and Financial Data by corresponding with us by post, phone, email or otherwise or by entering into a contract with us. You may also provide us with Identity and Contact Data of others (such as family members) in your interactions with us.
- **Group entity interactions.** We may receive Identity, Contact, Interaction and Financial Data about you from one of our group companies where we are providing an advisory or administrative service to that group company.
- **Third parties or publicly available sources.** We may also receive personal data about you from various third parties and public sources as set out below:
  - Identity and Contact Data from publicly available sources such as Companies House, the Land Registry, and the Electoral Register based inside the EU.

- Identity and Contact Data from business directories and other commercially or publicly available sources e.g. to check or improve the information we hold (like your address) or to obtain better contact information if we are unable to contact you directly.

#### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

**Performance of Contract** - processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Legitimate Interest** - the interest of our business in conducting and managing our business. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or we are otherwise required or permitted to by law).

**Comply with a legal or regulatory obligation** - processing your personal data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.

Generally, we do not rely on consent as a legal basis for processing your personal data.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enter into a contract with you	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (e.g. “Know Your Customer” and anti-money laundering checks)

To exercise rights under our contract with you	(a) Identity (b) Contact (c) Financial (d) Interaction	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (e.g. to recover debts due to us)
To provide services and perform our obligations in relation to the Portfolio	(a) Identity (b) Contact	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to ensure proper record keeping, to deal with the administration of the Portfolio)
To manage our relationship with you	(a) Identity (b) Contact (c) Interaction	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated)
Administration of lending relationships where the Lender has security over the Portfolio	(a) Identity (b) Contact (c) Financial	Necessary for our legitimate interests and the legitimate interests of a third-party lender (for running our business and complying with the terms of our lending facilities)
Establishment, exercise or defence of legal claims	(a) Identity (b) Contact (c) Interaction	(a) Performance of a contract with you  (b) Necessary for our legitimate interests
To administer and protect our business	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation

CCTV	Interaction Data	Necessary for our legitimate interests (to protect our premises, assets and employees from crime, we operate CCTV systems in our premises which record images for security purposes).
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### **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.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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.

## **5. SHARING YOUR PERSONAL DATA**

We may share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Other companies in the Group acting as controllers, joint controllers or processors and who are based in the EEA and provide services, reporting and administration necessary for the operations of the group.
- Professional advisers and consultants acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services necessary for the operations of the group.
- Managing agents and other service providers necessary for the proper administration of the Portfolio.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- Lenders to entities within the group and other financial services providers.
- Service providers acting as processors who provide IT and system administration services.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to

our business, then the new owners may use your personal data in the same way as set out in this privacy statement.

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

We will never sell your personal data to someone else.

## **6. INTERNATIONAL TRANSFERS**

Save in very limited circumstances, we will not transfer your personal data outside the European Economic Area (EEA).

If your information is transferred outside of the EEA, we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK / EEA data privacy laws e.g. we will put in place legal agreements with our third-party suppliers and do regular checks to ensure they meet these obligations.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. DATA RETENTION**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see ***Your legal Rights – Right to request erasure*** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

You have certain rights under data protection laws in relation to your personal data. These are:

### **Right to be informed**

You have a right to receive clear and easy to understand information on what personal data we have, why and with whom we share it – we do this in this Privacy Statement.

### **Right of access**

You have the right of access to your personal data. If you wish to receive a copy of the personal data we hold on you, you may make a data subject access request.

### **Right to request that your personal information be rectified**

If your personal data is inaccurate, incomplete or misleading in any way, you can request that it is corrected.

### **Right to request erasure**

You can ask for your personal data to be deleted or removed if there is not a compelling reason for us to continue to hold it.

### **Right to restrict processing**

You can ask that we block or suppress the processing of your personal data for certain reasons. These include:

- Where you do not think that your personal data is accurate. In this case we will start processing again once we have checked the accuracy of your personal data and it has been corrected if necessary;
- Where the processing is unlawful, but you do not want us to erase your personal data;
- Where we no longer need the personal data for the purposes of our processing, but you need the data to establish, exercise or defend legal claims;

- Where you have objected to processing because you believe that your interests should override our legitimate interests. In this case we will start processing again once we have checked whether or not our legitimate interests override your interests.

### **Right to data portability**

You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way.

### **Right to object**

You can object to us processing your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing if you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

### **Rights related to automatic decision-making including profiling**

You have the right to ask us to:

- give you information about its processing of your personal information;
- request human intervention or challenge a decision where processing is done solely by automated processes;
- carry out regular checks to make sure that our automated decision-making and profiling processes are working as they should.

If you wish to exercise any of the rights set out above, please Contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to

ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

24 May 2018

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