

STRATSTONE

DATA PROTECTION POLICY

INTRODUCTION

Stratstone Developments London Ltd needs to gather and use certain information about individuals. These can include (current and former) customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the firm's data protection standards - and to comply with the law.

WHY THIS POLICY EXISTS

This data protection policy ensures Stratstone Developments London Ltd:

- + Complies with data protection law and follows good practice.
- + Protects the rights of employees, customers and partners.
- + Is open about how it stores and processes individuals' data.
- + Protects itself from the risks of a data breach.

DATA PROTECTION LAW

The Data Protection Act 1998 and the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) describe how organisations - including Stratstone Developments London Ltd - must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act 1998 and General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) are underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

PEOPLE, RISKS AND RESPONSIBILITIES

POLICY SCOPE

This policy applies to:

- + The head office of Stratstone Developments London Ltd
- + All branches of Stratstone Developments London Ltd
- + All employees and Directors of Stratstone Developments London Ltd
- + All contractors, suppliers and other people working on behalf of Stratstone Developments London Ltd

It applies to all data that the firm holds relating to the identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998 and the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). This can include:

- + Names of individuals
- + Postal addresses
- + Email addresses
- + Telephone numbers
- + plus, any other information relating to individuals

DATA PROTECTION RISKS

This policy helps to protect Stratstone Developments London Ltd from some very real data security risks, including:

- + Breaches of confidentiality. For instance, information being given out inappropriately.
- + Failing to offer choice. For instance, all individuals should be free to choose how the firm uses data relating to them.
- + Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

RESPONSIBILITIES

Everyone who works for or with Stratstone Developments London Ltd has some responsibility for ensuring data is collected, stored and handled appropriately. Each team that handles personal data must

ensure that it is handled and processed in line with this policy and data protection principles. However, these people have key areas of responsibility:

- + The Directors are ultimately responsible for ensuring that Stratstone Developments London Ltd meets its legal obligations.
- + The Data Protection Officer is responsible for:
 - + Keeping the Directors updated about data protection responsibilities, risks and issues.
 - + Reviewing all data protection procedures and related policies, in line with an agreed procedure.
 - + Arranging data protection training and advice for the people covered by this policy.
 - + Handling data protection questions from employees and anyone else covered by this policy.
 - + Dealing with requests from individuals to see the data Stratstone Developments London Ltd holds about them (also called 'subject access requests').
 - + Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- + The IT Manager is responsible for:
 - + Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - + Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - + Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
- + The Marketing Manager is responsible for:
 - + Approving data protection statements attached to communications such as emails and letters.
 - + Addressing any data protection queries from journalists or media outlets like
 - + Where necessary, working with other employees to ensure marketing initiatives abide by data protection principles.

GENERAL STAFF GUIDELINES

- + The only people able to access data covered by this policy should be those who need it for their work.
- + Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- + Stratstone Developments London Ltd will provide training to all employees to help them understand their responsibilities when handling data.
- + Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- + In particular, strong passwords must be used and they should never be shared.
- + Personal data should not be disclosed to unauthorised people, either within the firm or externally.

- + Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- + Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.

DATA STORAGE

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT Manager / Data Controller. When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason and to original copies of documents:

- + When not required, the paper or file should be kept in a locked drawer or filing cabinet.
- + Employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
- + Data printouts should be shredded and disposed of securely when no longer required.
- + Paper Documents, especially originals of official purpose such as certificates or similar must be sent using tracked delivery services which obtain a signature upon delivery.
- + Documents sent outside the UK should always be sent by a reputable international courier using tracked delivery services which obtain a signature upon delivery.
- + When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:
 - + All computers should have encrypted local disk drives.
 - + Data should be protected by strong passwords that are changed regularly and never shared between employees.
 - + Data stored on USB drives, CD's or DVD's is not permitted. Any data sent to us in these formats should be given to IT for transfer to the correct secure storage location and the media should then be properly destroyed.
 - + Data should only be stored on designated drives and servers and should only be uploaded to an approved cloud computing service.
 - + Servers containing personal data should be sited in a secure location, away from general office space.
 - + Data should be backed up frequently. Those backups should be tested regularly, in line with the firm's standard backup procedures.
 - + Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
 - + All servers and computers containing data should be protected by approved security software and a firewall.

DATA USE

Personal data is of no value to Stratstone Developments London Ltd unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- + When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.
- + Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- + Data must be encrypted before being transferred electronically. The IT Manager can explain how to send data to authorised external contacts.
- + Personal data should never be transferred outside of the European Economic Area.
- + Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data.

DATA ACCURACY

The law requires Stratstone Developments London Ltd to take reasonable steps to ensure data is kept accurate and up to date. The more important it is that the personal data is accurate, the greater the effort Stratstone Developments London Ltd should put into ensuring its accuracy. It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- + Data will be held in as few places as necessary. Staff should not create any unnecessary data sets.
- + Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call.
- + Stratstone Developments London Ltd will make it easy for data subjects to update the information Stratstone Developments London Ltd holds about them. For instance, via regular contact and review of data.
- + Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.
- + It is the Marketing Manager's responsibility to ensure marketing databases are checked against industry suppression files every six months.

SUBJECT ACCESS REQUESTS

All individuals who are the subject of personal data held by Stratstone Developments London Ltd are entitled to:

- + Ask what information the firm holds about them and why.

- + Ask how to gain access to it.
- + Be informed how to keep it up to date.
- + Be informed how the company is meeting its data protection obligations.

If an individual contacts the firm requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller info@stratstonedevelopments.com. The data controller can supply a standard request form, although individuals do not have to use this.

Individuals may be charged £10 per subject access request. The data controller will aim to provide the relevant data within 30 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

DISCLOSING DATA FOR OTHER REASONS

In certain circumstances, the Data Protection Act and the General Data Protection Regulation allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Stratstone Developments London Ltd will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Directors and from the firm's legal advisers where necessary.

PROVIDING INFORMATION

Stratstone Developments London Ltd aims to ensure that individuals are aware that their data is being processed, and that they understand:

- + How the data is being used.
- + How to exercise their rights.

To these ends, the firm has a general [privacy statement](#) setting out how data relating to individuals is used by the firm.

PRIVACY NOTICE

Stratstone Developments London Ltd conduct work for clients in a range of areas and must collect data for this purpose. This privacy notice explains how we use any personal information we collect about you.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

We collect information about you when you engage us for advice or services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

WHY DO WE NEED TO COLLECT AND USE YOUR PERSONAL DATA?

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we'd also be unable to fulfil our legal and regulatory obligations.

Where special category data is required we'll obtain your explicit consent in order to collect and process this information.

HOW WILL WE USE THE INFORMATION ABOUT YOU?

We collect information about you in order to provide you with the services for which you engage us.

WHO MIGHT WE SHARE YOUR INFORMATION WITH?

If you agree, we may email you about other products or services that we think may be of interest to you.

If you agree, we'll pass on your contact information to our group of companies so that they may offer you their products and services.

We won't share your information for marketing purposes with any third party.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services or other credentialed specialist advisers.

Where third parties are involved in processing your data we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes and this search will be recorded as an identity check. It will not affect your ability to obtain credit.

HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

In principle, your personal data shouldn't be held for longer than is required under the terms of our contract for services with you. However, we're subject to regulatory requirements to retain data for specified minimum periods, usually between 7 and 10 years. We also reserve the right to retain data for longer than this in order to be able to provide you with long term analyses, trends and reports or other business data and to allow us to assist you should you be subject to an HMRC enquiry or investigation.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

HOW CAN I ACCESS THE INFORMATION YOU HOLD ABOUT ME?

You have the right to request a copy of the information that we hold about you. If you'd like a copy of some or all of your personal information, please email or write to us using the contact details noted below. When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use. We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

MARKETING

We'd like to send you information about our products and services and those of other companies in the Stratstone Estates group which may be of interest to you. If you agree to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the group. If you no longer wish to be contacted for marketing purposes, please contact us by email or post.

WHAT CAN YOU DO IF YOU ARE UNHAPPY WITH HOW YOUR PERSONAL DATA IS PROCESSED?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113 (local rate)

CHANGES TO OUR PRIVACY POLICY

We keep our privacy policy under regular review. This privacy policy was last updated on 31st October 2019.

HOW TO CONTACT US

Please contact us if you have any questions about our privacy policy or information we hold about you: by email to info@stratstonedevelopments.com.

OR WRITE TO US AT

Data Controller
Stratstone Developments London Ltd
157 High Street,
Ongar,
Essex,
CM5 9JD