# Sussex Heights (Brighton) Ltd

The resident management company for Sussex Heights

# **Privacy Notice**

Version 1.1 6<sup>th</sup> April, 2022

Sussex Heights (Brighton) Ltd – Registered in England and Wales Company Number 02676784

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# **1. Version Control**

Document Version	Date Issued
Version 1.0	21 <sup>st</sup> January, 2013
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Version 1.1	6 <sup>th</sup> April, 2022

# 2. About this privacy notice

This privacy notice provides you with information about how we collect, use and disclose your personal information.

It applies when you visit or use our website <u>www.sussexheights.co.uk</u>, are a resident or leaseholder of Sussex Heights. Sussex Heights (Brighton) Ltd uses your personal information for the purposes detailed in this notice and acts as a Controller of the data that you provide or is collected for these purposes, and sets out the legal basis for doing so.

# 3. How we collect your personal information

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

- When you visit our website and enter your information online to register for our services.
- When you contact us with queries, to report disrepair, to raise an issue or make a suggestion or provide feedback to us on our services.
- When you have given a third-party permission to share with us the information they hold about you.
- Where we collect data from publicly-available sources or where the information is made public as a matter of law.
- As you interact with our website, we automatically collect technical data about your computer equipment and actions. We collect this personal data by using cookies, server logs and other similar technologies where we have your consent to do so.

# 4. What personal information do we collect?

We collect, use, store and transfer different kinds of personal data. This is:

- Your name and title.
- Contact details such as your address, email address and telephone numbers.
- Usage data and information on how you use door entry fob keys and our website.
- Technical data such as your internet protocol (IP) address.
- CCTV images and audio recordings.

#### 5. How we use Cookies

We use "cookies" on our website. A cookie is a piece of data stored on a site visitor's computer hard drive to help us improve your access to our site and identify repeat visitors to our site. For instance, when we use a cookie to identify you, you would not have to log in a password more than once, thereby saving time and improving your user experience.

Our web site may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects your personal information.

All except strictly necessary cookies (ones that affect the performance of how you interact with the website) are optional and we always ask for your consent to use these.

Cookie Name	Туре	Purpose	Duration
_ga	Analytics	The _ga cookie installed by Google Analytics calculates visitor, session and campaign data and also keeps track of the site usage for the Site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors	2 Years
_gid	Analytics	Installed by Google Analytics, the _gid cookie stores information on how visitors use the website, whilst also creating an analytics report of the website's performance. Some of the data that are collected includes the number of visitors, their source, and the pages they visit anonymously.	1 day
gat_gtag_UA_17779037_1	Analytics	Set by Google to distinguish users	1 minute

## 6. How we use your personal information

We will only use your personal data when the law allows us to for the following purposes:

- Where we need to provide you with services.
- Where we have your consent.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Examples of how and when we may use your personal data are as follows:

- To send you communications required by law
- To advise you about changes to the services we provide you.
- To comply with our contractual or legal obligations to share data with law enforcement agencies.
- To book/arrange appointment requests (for example with a surveyor or contractor attending your property).
- We may use CCTV images and audio recordings or log entries of your door entry fobs to investigate any issues brought to our attention and may share these with law enforcement agencies where requested.

## 7. Sharing of your information

We will not share your information with any third party outside of our organisation unless it is necessary in order to fulfil your request or where we partner with another party to provide specific services.

When you sign up for these services, we will share your name and your contact information with the third party so that they can provide these services to you. These third parties can only use your personal data to provide these services.

#### 8. Grounds for processing

We require a legal basis to capture and process your personal data. Here is each type of processing that we undertake; -

- We have a legitimate interest to capture your images and audio recordings in the reception area and entrances to the building for security, prevention of crime and anti-social behaviour purposes.
- We use your consent to provide you with updates and information about Sussex Heights through our Newsletters. You may unsubscribe at any time by using the link in the e-mail, or by contacting <u>info@sussexheights.co.uk</u>
- As a leaseholder we have a contractual obligation to provide you with updates about routine maintenance, service charges, meetings, legal matters, EGM's and AGM's.
- We have a legitimate interest to investigate any issues brought to our attention where we may refer to door access records to establish the identity of individuals involved.

## 9. Data Retention

We will only retain your personal data for as long as is necessary to provide the services or where there is a legal requirement to do so.

You can find full details in our Data Retention Policy.

#### **10.Where we process your data**

The Sussex Heights website is hosted in the USA. Standard Contractual Clauses in the supplier contract provide safeguards and the legal basis for data transfers outside of the UK.

### **11.Data security**

We take technical and organisational measures to protect your personal information. When you submit your information via the website, your information is protected both online and offline by encryption and transmitted to us in a secure way. You can verify this by looking for a closed lock icon in your web browser next to the web page address, or by looking for "https" at the beginning of the address of the web page.

While we use encryption to protect personal information transmitted online, we also protect your information offline. Strict access controls are in place and only Board Directors and employees who have a specific business purpose to perform their job roles are granted access to your personal information. These are reviewed regularly. The computers and servers on which we store your personal information are kept in a secure environment.

## **12.Your communication preferences**

You may update your communication preferences by contacting us at <u>info@sussexheights.co.uk</u>

# **11. Your Rights**

UK GDPR provides you with a number of rights to request free of charge:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing

- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

If you wish to exercise these rights, please submit your request in writing to info@sussexheights.co.uk

To protect your privacy and security, we may require you to verify your identity.

You can find further information on your rights on the Information Commissioners website at <a href="https://ico.org.uk/your-data-matters/">https://ico.org.uk/your-data-matters/</a>

Keeping your personal information up to date is your responsibility and we may not be able to contact you in the event of an emergency if your contact details are out of date. You may e-mail any changes to info@sussexheights.co.uk

### 12. Changes

We may update this privacy notice from time to time. Any changes will be noted by the Version Control with an updated revision date. If we make any material changes to the way in which we collect or process your personal data we will provide notice by e-mail, newsletter or by other means.

#### 13. Contact us

You may contact the Board of Sussex Heights (Brighton) Ltd at any time by e-mailing info@sussexheights.co.uk