



Brunel Management Privacy Statement

At Brunel Management Ltd, we're committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes.

Any questions regarding this Policy and our privacy practices should be sent by email to admin@brunel.je or by writing to Brunel Management Ltd, Brunel Chambers, Devonshire Place, St Helier, JE2 3RD. Alternatively, you can telephone 01534 750200.

You have the right to make a complaint at any time to the Data Protection Authority, the Jersey supervisory authority for data protection issues.

Who are we?

Brunel Management is a property management company looking after all aspects of property management including: portfolio management; social rented housing; management of flying freehold and share transfer companies.

How do we collect information from you?

We obtain information about you in various ways, including via: the Affordable Housing Gateway; questionnaires; lawyers; and through doing business with you.

What type of information is collected from you?

The personal information we collect might include your name, address, email address, telephone numbers, bank details, dates of birth, housing entitlement, KYC details, car details. In short any relevant information needed for us to deliver property management services.

We do not collect 'Special categories' of personal data (sensitive personal data) relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning a natural person's sex life or sexual orientation.

We may collect data concerning health where it may impact the allocation of housing or where such data is necessary for us to provide services (for instance, we may be contacted by Occupational Therapists to discuss adaptations to your home). We may also collect data about the ages of children, this is to ensure (where we are responsible) that we appropriately allocate housing.

How is your information used?

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

- || to carry out our obligations arising from any contracts entered into by you and us;
- || seek your views or comments on the services we provide;
- || notify you of changes to our services;
- || send you communications;
- || variously invoice for rental services.

If you do not provide personal data that we require to provide our services, then we may be unable to provide you with the services and may need to terminate any contractual relationship with you.

What is our legal basis for processing your personal data?

Processing is necessary for the performance of various contracts with you (for example, where we hold leases or property management contacts).

Processing is necessary for compliance of legal obligations (for example, statutory obligations eg, rates forms; completion of directors and share registers).

Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party and your interests and fundamental rights to do not override those interests.

Processing where you have provided us with your express consent.

Processing is necessary for the purposes of carrying out the obligations of the controller or of the data subject in the field of employment (as this relates directly to Brunel Management Staff).

Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.

Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Brunel Management Ltd will not contact you for marketing purposes.

Third Party Service Providers: We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example: to enable maintenance sub-contractors to complete work orders). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties other than as stated above unless we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime (for example, we may pass on your name and address to Banks to comply with anti-fraud and terrorism legislation).

Statutory Obligations: We may pass you information on to statutory bodies (for example: we will pass on your name and address when required by Parish authorities to enable rates forms to be completed; in the case of companies we will pass on such information as is required by the Jersey Financial Services Commission).

How you can access and update your information

All individuals who are the subject of personal data held by Brunel Management Ltd under certain circumstances, by law are entitled to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to check that we are lawfully processing it. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of 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 on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change

want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact admin@brunel.je, or write to us at: Brunel Management Ltd, Brunel Chambers, Devonshire Place, St Helier, JE2 3RD. Alternatively, you can telephone 01534 750200. Please note that we may decline to comply with any request to delete or restrict the use of your information if we still require that information for any legal or contractual reasons.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email admin@brunel.je. Once we have received notification 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.

The withdrawal of consent shall not affect the lawfulness of processing for other reasons and based on other grounds where this is permitted under applicable law.

Security precautions in place to protect the loss, misuse or alteration of your information

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Profiling

We do not analyse your personal information to create profiles of your interests and preferences.

Use of 'cookies'

Like many other websites, Brunel Management Ltd uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or

under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

Automated decision-making

We do not envisage that any decisions will be taken about you using fully automated means, however we will notify you in writing if this position changes.

Transferring your information outside of Europe

Your information will not be transferred outside of Jersey.

Retention Period

When Brunel Management no longer provides Client services, personal information will be destroyed (or erased) after 10 years, unless said information is required to be kept by statute. We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the shareholder records). We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in July 2018.