

# Soho Estates Privacy Notice:

Policy Version: 3<sup>rd</sup> August 2026.

## 1. Introduction

- 1.1 Welcome to Soho Estates Limited privacy notice (the "**Notice**").
- 1.2 Soho Estates Limited respects your privacy and is committed to protecting your Personal Data (as defined below in Section 2). This Notice explains what Personal Data we collect when you visit our website, visit our properties or otherwise interact with us, how we use it, who we share it with, and your rights. Please read it carefully so you understand how and why we are using your Personal Data. We may also provide additional privacy notices for specific interactions or data handling.
- 1.3 This Notice applies to the following categories of individuals:
  - 1.3.1 visitors to Soho Estates Limited sites (including commercial and residential properties managed or operated by us);
  - 1.3.2 suppliers and contractors who provide goods or services to us;
  - 1.3.3 commercial and residential tenants of properties owned or managed by us; and
  - 1.3.4 visitors to our website ([www.sohoestates.co.uk](http://www.sohoestates.co.uk) or any successor website).
- 1.4 This Notice does not apply to any other data processing, including without limitation:
  - 1.4.1 Personal Data that we collect offline or via other websites that do not link to this Notice;
  - 1.4.2 Personal Data that you share with third party services which we do not own or control.
- 1.5 Soho Estates Limited (also referred to as Soho Estates, "we", "us", or "our" in this Notice) is the data controller responsible for your Personal Data. This means we decide how and why your Personal Data is processed. We are registered with the Information Commissioner's Office (ICO) as a controller (registration number ZA577580).
- 1.6 If you have any questions about this Notice, including any requests to exercise your legal rights (Section 9), please contact us using the information set out in the contact details section (Section 10).

## 2. Categories of Personal Data Collected

- 2.1 "**Personal Data**", or personal information, means any information about an individual from which that person can be identified, either on its own or when combined with other information. It does not include anonymous or statistical data that cannot be linked back to that individual.
- 2.2 We may collect, use, store and transfer different kinds of Personal Data about you either through our website or our other interactions with you, which we have grouped together as follows:
  - 2.2.1 *Identity Data* includes first name, maiden name, last name, username or similar identifier, marital status, title, social media name, date of birth and gender.
  - 2.2.2 *Contact Data* includes billing address, delivery address, email address and telephone numbers.
  - 2.2.3 *Financial Data* includes bank account, payment card details, and taxpayer status.

- 2.2.4 *Transaction Data* includes details about payments to and from you and other details of services you have purchased from us.
- 2.2.5 *Technical Data* includes internet protocol ("**IP**") address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- 2.2.6 *Usage Data* includes information about how you use our website, products and services.
- 2.2.7 *Marketing and Communications Data* includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- 2.3 We do not routinely collect special category Personal Data about you (such as information about your health, race, ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership, or biometric data). We will only collect such data where strictly necessary - for example, in connection with a health and safety incident at one of our properties or where required for tenancy management purposes.
- 2.4 We do not collect any information about criminal convictions and offences other than where it is necessary in connection with the safety and security of our properties or as required by law (e.g. this may take place as part of our new tenant checks where necessary for those purposes, and we will provide you with additional information prior to collection).
- 3. **How data is collected:**
  - 3.1 We use different methods to collect data from and about you including through:
    - 3.1.1 *Direct interactions.* You may give us your Personal Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:
      - 3.1.1.1 enquire about or apply for a residential or commercial tenancy;
      - 3.1.1.2 enter into a supplier or contractor agreement with us;
      - 3.1.1.3 sign in as a visitor to one of our properties;
      - 3.1.1.4 subscribe to our publications or request marketing communications;
      - 3.1.1.5 make a complaint, enquiry or service request;
      - 3.1.1.6 provide feedback or contact us via our website, email, telephone or in person
    - 3.1.2 *CCTV and access control systems.* When you visit our properties, CCTV cameras and access control systems may record your image, movements, and entry and exit times for security, health and safety, and crime prevention purposes. CCTV footage is typically retained for 30 days unless required longer for an investigation or legal claim.
    - 3.1.3 *Automated technologies or interactions.* As you interact with our website, we will collect Technical Data about your equipment, browsing actions and patterns where you have consented to allow us to use non-essential cookies or other similar technologies. We may collect this Technical Data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites deploying our cookies.
    - 3.1.4 *Third parties and publicly available sources.* We may receive Personal Data about you from third parties, including tenant referencing agencies, credit reference

agencies, estate agents, your employer or guarantor (for tenancy applications), public registers (such as Companies House and the Land Registry), and fraud prevention databases.

3.1.5 **Cookies.** When you visit our website, we install cookie(s) or use other similar technologies to your device. Please note that certain information about your computer hardware and software, browsing actions and patterns may be collected through Cookies as you navigate through and interact with our website. This information is used by us for operation of our website.

3.1.5.1 A "cookie" is a small piece of data that can be sent by a Web server to your computer, which then may be stored by your browser on your computer's hard drive. Please note that certain information about your computer hardware and software, browsing actions and patterns may be collected through Cookies as you navigate through and interact with our website. This information is used by us for operation of our website.

3.1.5.2 Cookies and other similar technologies are useful in allowing more efficient login for users, tracking transaction histories, preserving information between sessions, and improve the functionality of the website. We only use necessary cookies which are essential for the operation of our website. For example, they enable us to recognize you when you return to our site and keep track of your specified preferences (such as location, language preference). They also let us save your cookie preferences and keep our site secure.

3.1.5.3 **We have listed the cookies we use and the purposes for which we use them in the table below:**

| Cookie              | Expiration/Max Age          | Domain                | Cookie Purposes                                                                                                |
|---------------------|-----------------------------|-----------------------|----------------------------------------------------------------------------------------------------------------|
| bSession            | 30 minutes                  | www.sohoestates.co.uk | Session management and site performance.                                                                       |
| client-session-bind | When you close your browser | www.sohoestates.co.uk | API security and session integrity.                                                                            |
| hs                  | When you close your browser | www.sohoestates.co.uk | Security protection.                                                                                           |
| server-session-bind | When you close your browser | www.sohoestates.co.uk | API security and session management - ensuring requests are routed consistently to the correct backend server. |
| ssr-caching         | 20 seconds                  | www.sohoestates.co.uk | Page rendering and performance optimisation.                                                                   |

|            |                             |                       |                                                                                                                                            |
|------------|-----------------------------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| svSession  | 35 days                     | www.sohoestates.co.uk | Visitor session identification and security.                                                                                               |
| XSRF-TOKEN | When you close your browser | www.sohoestates.co.uk | Protection against fraudulent requests - protects against Cross-Site Request Forgery (CSRF/XSRF) attacks by verifying legitimate requests. |

3.1.5.4 Some web browsers such as Microsoft Edge, Apple Safari and Google Chrome may have features that can notify you when you receive a cookie or prevent cookies from being sent. If you disable cookies, however, you may not be able to use certain personalized functions of this website.

You can find out how to manage cookies on popular browsers following the links below:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)

3.1.5.5 Note that cookies on our website allow you to take advantage of some of our essential features. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

#### 4. **Legal Basis for processing**

4.1 We will only use your Personal Data where we are permitted to do so by applicable law. Under UK data protection law, the use of Personal Data must be justified under one of several legal grounds. The principal legal grounds that justify our use of your Personal Data are:

|                                  |                                                                                                                                                                                                                                                                       |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consent</b>                   | We have obtained your active agreement to use your Personal Data for a specific purpose. This consent may be collected (for example) via a consent form or tick-box and you can withdraw your consent at any time using the unsubscribe facility or contacting us).   |
| <b>Performance of a contract</b> | Your Personal Data is necessary to enter into or perform our contract with you e.g., to enter into a tenancy agreement with you.                                                                                                                                      |
| <b>Legal obligation</b>          | We need to use your information to comply with a legal obligation - for example, health and safety requirements, tax obligations, or responding to lawful requests from authorities. We will identify the relevant legal obligation when we rely on this legal basis. |
| <b>Legitimate interests</b>      | We need to use your Personal Data to run our business and pursue our legitimate interests.,                                                                                                                                                                           |

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | For example, we rely on legitimate interests to keep our properties secure, prevent fraud, and improve our services. Unless it is a 'recognised legitimate interest' under the UK GDPR, we consider and balance any potential impact on you and your rights (both positive and negative) 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 are otherwise required or permitted to by law). |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

4.2 In limited circumstances, we may need to collect special category Personal Data (as described in Section 2.3 above). Where we do so, we will only process such data if one of the following legal bases applies, in addition to the legal bases described above:

- 4.2.1 Explicit consent: where you have consented to our use of this information. You will have been presented with a consent form or facility in relation to any such use and may withdraw your consent at any time);
- 4.2.2 Employment and social protection purposes: where processing is necessary to carry out our obligations in the field of employment, social security or social protection law;
- 4.2.3 Data made public by you: where you have deliberately made the information public yourself;
- 4.2.4 Legal claims: where processing is necessary for establishing, exercising or defending legal claims.

## 5. How we use your Personal Data

5.1 Purposes for which we will use your Personal Data

| What do we collect?                                                           | What do we use the data for?                                                                                                                                                                                                                                                                                                                                                                           | What is our legal basis for collecting it?                                                                                                                                                                                                                                        |
|-------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>All visitors to our physical sites (including tenants and contractors)</b> |                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                   |
| a) CCTV and Access Data<br>b) Identity Data<br>c) Contact Data                | Security, health and safety, and crime prevention at our properties. CCTV systems operate at our properties and visitor sign-in procedures are in place. We process this data to ensure the safety and security of our sites, staff, visitors, to investigate incidents and to assist in the prevention and detection of crime. This may also involve us sharing footage with authorities or insurers. | a) Necessary for our legitimate interests (for the security of our properties and individuals, and for the prevention and detection of crime).<br>b) Necessary to comply with a legal obligation (health and safety legislation or where disclosure is otherwise required by law) |
| a) Identity Data<br>b) Contact Data                                           | Visitor management. We collect sign-in information from visitors to our properties, including name, contact details, the name of the person being visited, and arrival and departure times.<br>Managing any accidents, incidents and emergency situations.                                                                                                                                             | a) Necessary for our legitimate interests (to maintain accurate records of visitors to our sites for security and health and safety purposes).<br>b) Necessary to comply with a legal obligation (health and safety legislation).                                                 |

|                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a) CCTV and Access Data<br>b) Identity Data<br>c) Usage Data                    | Some of our CCTV systems include technology to support footfall counting and audience measurement. These allow us to count the number of visitors entering and moving through specific areas of our properties; measure traffic and time spent in particular zones; and generate estimated aggregated insights about visitor groups, such as approximate age range and gender. This helps us understand how visitors use our spaces, improve our services, safety and advertising/marketing of our businesses. We carry out a balancing test to ensure this processing does not override your rights. | Necessary for our legitimate interests (improving our services and premises and conducting marketing of them)                                                                                                                      |
| a) Technical Data (MAC address, device type)<br>b) Usage Data                   | Providing public wifi services to visitors. We offer wifi connectivity to visitors and members of the public at our premises. When you connect to our wifi network, we collect limited technical data to provide the service and maintain network security. This is not a secure network and we do not monitor your browsing activity.                                                                                                                                                                                                                                                                | Necessary for our legitimate interests (providing visitor amenities and maintaining network security).                                                                                                                             |
| <b>Our suppliers / contractors</b>                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                    |
| a) Identity Data<br>b) Contact Data<br>c) Financial Data<br>d) Transaction Data | Processing supplier and contractor payments. We use this data to manage invoices, fees, and payments under our agreements with suppliers and contractors. This applies to suppliers and contractors.                                                                                                                                                                                                                                                                                                                                                                                                  | a) Performance of a contract with you.<br><br>b) Necessary for our legitimate interests (to pay debts we owe and to recover debts due to us).                                                                                      |
| a) Identity Data<br>b) Contact Data<br>c) Marketing and Communications Data     | Managing our relationship with suppliers and contractors, including corresponding about service delivery, handling enquiries, and notifying you of changes to our terms or this Notice.                                                                                                                                                                                                                                                                                                                                                                                                               | a) Performance of a contract with you.<br><br>b) Necessary to comply with a legal obligation.<br><br>c) Necessary for our legitimate interests (to keep our records updated and manage our supplier and contractor relationships). |
| a) Identity Data<br>b) Contact Data<br>c) Financial Data                        | Onboarding and due diligence for suppliers and contractors. We collect data to carry out necessary vetting, compliance and due diligence checks before and during our engagement with suppliers and contractors.                                                                                                                                                                                                                                                                                                                                                                                      | a) Performance of a contract with you.<br><br>b) Necessary to comply with a legal obligation.<br><br>c) Necessary for our legitimate interests (fraud prevention and ensuring the suitability of our business partners).           |
| <b>Our commercial tenants</b>                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                    |
| a) Identity Data<br>b) Contact Data                                             | Registering you as a new commercial tenant. Where you or your organisation enter into a commercial lease with us, we use your Identity                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Performance of a contract with you.                                                                                                                                                                                                |

|                                                                                                |                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                         |
|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                | and Contact Data to set up and manage your account.                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                         |
| a) Identity Data<br>b) Contact Data<br>c) Financial Data<br>d) Transaction Data                | Processing rent, service charges and other payments under commercial leases. We use this data to manage rent collection, arrears, service charge apportionment, insurance contributions and any other sums payable under a commercial lease, and to recover any money owed to us.                                                                        | a) Performance of a contract with you.<br><br>b) Necessary for our legitimate interests (to recover debts due to us, and protect our property and financial interests)                                                                                  |
| a) Identity Data<br>b) Contact Data<br>c) Tenancy Data<br>d) Marketing and Communications Data | Managing our relationship with commercial tenants, including corresponding about lease administration, service charges, property management matters, handling enquiries, and notifying you of changes to our terms or this Notice.                                                                                                                       | a) Performance of a contract with you.<br><br>b) Necessary to comply with a legal obligation.<br><br>c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with our commercial tenants).                   |
| a) Identity Data<br>b) Contact Data<br>c) Tenancy Data                                         | Lease administration, property management and maintenance (commercial tenants). We use your data to manage commercial leases, arrange maintenance and repairs to common parts and demised premises (where applicable), administer service charge schedules, and handle other matters relating to the management and upkeep of our commercial properties. | a) Performance of a contract with you.<br><br>b) Necessary to comply with a legal obligation (e.g. landlord obligations under property legislation).<br><br>c) Necessary for our legitimate interests (effective management of our property portfolio). |
| a) Identity Data<br>b) Contact Data<br>c) Marketing and Communications Data                    | Sending you relevant marketing communications for your business and making personalised suggestions and recommendations to you about goods or services that may be of interest to you.                                                                                                                                                                   | Necessary for our legitimate interests (to carry out direct marketing, develop our services and grow our business).                                                                                                                                     |
| <b>Our residential tenants</b>                                                                 |                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                         |
| a) Identity Data<br>b) Contact Data                                                            | Registering you as a new residential tenant. Where you apply for or enter into a tenancy with us, we use your Identity and Contact Data to set up and manage your tenancy account and enter into a lease.                                                                                                                                                | Performance of a contract with you.                                                                                                                                                                                                                     |
| a) Identity Data<br>b) Contact Data<br>c) Financial Data<br>d) Transaction Data                | Processing rent payments and service charges. We use this data to manage payments, collect fees and service charges, and recover any money owed to us.                                                                                                                                                                                                   | a) Performance of a contract with you.<br><br>b) Necessary for our legitimate interests (to recover debts due to us).                                                                                                                                   |

|                                                                                                                   |                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a) Identity Data<br>b) Contact Data<br>c) Tenancy Data<br>d) Marketing and Communications Data                    | Managing our relationship with residential tenants, including notifying you about changes to our terms or this Notice, dealing with your requests, complaints, service requests and queries.                       | a) Performance of a contract with you.<br><br>b) Necessary to comply with a legal obligation.<br><br>c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with our tenants).                                                       |
| a) Identity Data<br>b) Contact Data<br>c) Tenancy Data                                                            | Tenancy administration, property maintenance and repairs. We use your data to manage tenancy agreements, arrange maintenance and repairs, and handle matters relating to the upkeep of our residential properties. | a) Performance of a contract with you.<br><br>b) Necessary to comply with a legal obligation (e.g. landlord obligations under housing legislation).<br><br>c) Necessary for our legitimate interests (effective management of our property portfolio).                           |
| a) Identity Data<br>b) Contact Data<br>c) Marketing and Communications Data                                       | Sending you relevant marketing communications and making personalised suggestions and recommendations to you about goods or services that may be of interest to you.                                               | a) Consent, having obtained your prior consent to receiving direct marketing communications.<br><br>b) Necessary for our legitimate interests (to carry out direct marketing, develop our services and grow our business), where we are permitted to do so under applicable law. |
| <b>Visitors to our website</b>                                                                                    |                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                  |
| a) Identity Data<br>b) Contact Data<br>c) Technical Data                                                          | Administering and protecting our business and this website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data.                                         | Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud).                                                                                                                              |
| a) Identity Data<br>b) Contact Data<br>c) Usage Data<br>d) Marketing and Communications Data<br>e) Technical Data | Delivering relevant website content and online advertisements to you and measuring or understanding the effectiveness of the advertising we serve to you.                                                          | Necessary for our legitimate interests (to study how visitors use our website, to develop our services, to grow our business and to inform our marketing strategy).                                                                                                              |
| a) Technical Data<br>b) Usage Data                                                                                | Using data analytics to improve our website, services, customer relationships and experiences, and to measure the effectiveness of our communications and marketing.                                               | Necessary for our legitimate interests (to define types of users for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).                                                                                      |
| a) Identity Data<br>b) Contact Data<br>c) Marketing and Communications Data                                       | Sending you relevant marketing communications and making personalised suggestions and recommendations to you                                                                                                       | a) Consent, having obtained your prior consent to receiving direct marketing communications.                                                                                                                                                                                     |

|                                                                                                            |                                                                           |                                                                                                                                                                              |
|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                            | about goods or services that may be of interest to you.                   | b) Necessary for our legitimate interests (to carry out direct marketing, develop our services and grow our business), where we are permitted to do so under applicable law. |
| <b>Other</b>                                                                                               |                                                                           |                                                                                                                                                                              |
| a) Identity Data<br>b) Contact Data<br>c) Financial Data<br>d) Transaction Data<br>e) CCTV and Access Data | Obtaining legal advice, managing claims, litigation and insurance matters | Necessary for our legitimate interests (for running our business, protecting our property and interests).                                                                    |

#### 5.1.1

### 6. Data sharing and international transfers

- 6.1 We will share your Personal Data where necessary with the parties set out below for the purposes set out in Section 5 (above). We will only transfer your data to third parties in restricted circumstances and where it is lawful to do so.
- 6.2 We will share your data with service providers and selected third parties (e.g. property management agents, maintenance contractors, IT service providers, legal advisors), for purposes of providing our services to you and in connection with our efforts to prevent and investigate fraudulent activity.
- 6.3 More specifically, we may disclose your personal information:
- 6.3.1 if we transfer, purchase, reorganise, merge or sell any assets or the assets of a third party, and we disclose or transfer your Personal Data to the prospective seller, buyer or other third party involved in a business transfer, reorganisation or merger arrangement (and their advisors);
  - 6.3.2 if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation;
  - 6.3.3 to protect the rights, property, or safety of Soho Estates, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction, or disclosing information to courts, court-appointed persons/entities, receivers and liquidators, tribunals, regulatory authorities and law enforcement officers in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights, or to protect rights and interests of others;
  - 6.3.4 to our consultants or professional advisors, including legal advisors and accountants;
  - 6.3.5 to our insurers; and
  - 6.3.6 to any other third party as directed by you.
- 6.4 Where we work with global partners and service providers this requires us to transfer your data outside the UK and the European Economic Area ("EEA").
- 6.5 References in this section to transfers outside the EEA are relevant where we are subject to EU GDPR, for example where we offer services to individuals in the EU.

- 6.6 Some of the jurisdictions to which we transfer Personal Data may not provide the same level of protection to your Personal Data as provided in the UK. However, whenever we transfer your Personal Data outside of the UK or the EEA it is protected by implementing at least one of the following safeguards:
- 6.6.1 transferring to countries that the UK Government or the European Commission has determined provide an adequate level of data protection;
  - 6.6.2 using International Data Transfer Agreements, EU Standard Contractual Clauses, or other contracts approved by the ICO or the European Commission that provide equivalent protection for your data;
  - 6.6.3 where you have given us your explicit consent to a specific transfer;
  - 6.6.4 where we are otherwise legally entitled to do so under applicable data protection legislation; and
  - 6.6.5 where we use providers based in the US, we may transfer data to them if they participate in the UK Extension to the EU-US Data Privacy Framework or the EU-US Data Privacy Framework, which requires them to provide similar protection to Personal Data shared between the UK or the EEA and the US.

Please contact us using the details in Section 10 if you would like further information about the safeguards we use when transferring your Personal Data out of the UK or the EEA.

## **7. Data Security**

- 7.1 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.
- 7.2 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**

- 8.1 We will store your Personal Data for no longer than is necessary for the performance of our obligations or to achieve the purposes for which your Personal Data was collected, or as may be permitted under applicable law.
- 8.2 When determining the appropriate length of time for retention, multiple factors are taken into account, including:
  - 8.2.1 the nature and sensitivity of the personal information;
  - 8.2.2 the purposes for which the information is required;
  - 8.2.3 any laws or regulations that we are required to follow; and
  - 8.2.4 the period of time during which any claims or proceedings can be brought against us to defend against any such claims.
- 8.3 In practice, we typically retain your Personal Data for the duration of your relationship with us (for example, your tenancy or contract period) and then for a further period as required by legal, accounting or regulatory requirements. If you would like specific information about our retention periods, please contact us using the details in Section 10.

## 9. **Data subject rights**

- 9.1 Under UK data protection law, you have the following rights in relation to your Personal Data. These rights are not absolute and may be subject to exemptions. We will respond to any request within one month, although we may extend this by a further two months if your request is complex. We will not charge a fee for handling your request unless it is manifestly unfounded or excessive.
- 9.1.1 *Right to request access to your Personal Data* ("data subject access request"). This enables you to receive a copy of your Personal Data that we hold about you. There are some exemptions, which means you may not always receive all the information we process. Before providing any of this information, we must be able to verify your identity.
- 9.1.2 *Right to request correction* of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 9.1.3 *Right to request erasure* of your Personal Data. You have the right to ask us to erase your personal information in certain circumstances, for example where you request erasure and there is no other legal justification for the use of your information.
- 9.1.4 *Right to request restriction of processing of your Personal Data*. You can ask us to suspend the processing of your Personal Data in certain circumstances — for example, if you want us to verify the accuracy of your data, or if you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to continue using it.
- 9.1.5 *Right to object to processing and/or withdraw consent*: You have the right to ask us to stop processing your Personal Data, and we will do so, unless we can demonstrate compelling legitimate grounds for the processing; or the need to use your Personal Data in connection with any legal claims. If you have provided your consent to process your Personal Data and that is our legal basis for processing, you have the right to withdraw that consent at any time.
- 9.1.6 *Right to request the transfer* (data portability) of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- 9.1.7 *Right to object* to our processing of your Personal Data for direct marketing purposes and/or object to reliance on our legitimate interests as the basis for processing of your Personal Data;
- 9.1.8 *Right to withdraw consent* at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent;
- 9.1.9 *Rights relating to automated decision-making*. Where we make a decision about you that is based solely on automated processing (including profiling) and that decision has a significant effect on you (such as producing legal effects), you have the right to: (a) be informed that such a decision has been made; (b) request human review of the decision; (c) make representations to us about the decision; and (d) obtain a meaningful explanation of how the decision was reached. We do not currently use solely automated decision-making that has significant effects on individuals as part of the processing covered by this Notice.

**10. Contact details for privacy queries**

- 10.1 If you have any questions about this Notice, wish to exercise your rights, or have any complaints about how we handle your data, please contact us at [reception@sohoestates.co.uk](mailto:reception@sohoestates.co.uk) or write to: Soho Estates Limited, Ilona Rose House, Manette Street, London, W1D 4AL.
- 10.2 We have appointed MITMARK Security Ltd as our Data Protection Officer (DPO). You can contact our DPO directly at [lurong.chen@mitmark-intelligence.com](mailto:lurong.chen@mitmark-intelligence.com).
- 10.3 If you are unhappy with how we have handled your data, or you are not satisfied with our response to any requests you have made regarding your Personal Data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).
- 10.4 You can contact them by calling 0303 123 1113 or [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (please note we can't be responsible for the content of external websites).
- 10.5 If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.
- 10.6 We would, however, appreciate the chance to deal with your concerns before you approach the applicable regulatory body, so please contact us in the first instance.

**11. Changes to this Notice**

- 11.1 We may update this Notice from time to time to reflect changes in how we process Personal Data or to comply with legal requirements. When we make changes, we will update the version date at the top of this Notice and, where the changes are significant, we will provide a more prominent notice (such as by email or a banner on our website). We encourage you to review this Notice periodically.