



Introduction

Your privacy is important to the Arch Company Group. This Privacy Notice is issued by The Arch Company Services Limited (registered company no. 11518262) (**Archco**) on behalf of the Arch Company Group so when we mention **we, us** or **our** in this Privacy Notice, we are referring to the relevant company in the Arch Company Group responsible for processing your personal data. This Privacy Notice aims to give you information on how we collect and process your personal data through your application to become a tenant and during your time as a tenant with us.

It is important that you read this Privacy Notice together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data from you so that you are fully aware of how and why we are using your personal data. This Privacy Notice supplements other notices and privacy policies and is not intended to override them.

About us

The Arch Company Group is made up of different legal entities, and is a joint venture between TT CDR Holdings Limited (**Telereal Trillium**) and BX Holdco Limited (**Blackstone**). For the purposes of applicable data protection laws, each of Archco, Telereal Trillium and Blackstone will be a data controller of any personal data collected by us. Further information can be found on our website at www.thearchco.com

We have appointed a data protection manager (**DPM**) who is responsible for overseeing the protection of your personal data. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPM at data.protection@thearchco.com

How your personal data is collected

We collect your personal data throughout your application to become a tenant as well as during your time as a tenant. The purpose for collecting your personal data (whether in person over the phone and/or via a digital or hard copy application form) is to enable us to review your eligibility for renting a commercial property with us, undertake the appropriate legally required checks prior to entering the tenancy agreement and to manage any future Landlord and Tenant relationship we may have with you

Personal data we may collect from you

Personal Data	Lawful basis for processing
<p>Your full name Date of birth Your National Insurance Number Your home address Your previous address(es) during the last 5 years Your home telephone number Your bank account number & sort code Mobile telephone number E-mail address</p>	<p><i>This personal data will be collected in all cases because It is necessary for the performance of our contract with you, or to take steps for entering into our contract with you.</i></p>
<p><i>Credit referencing – including whether or not you have been declared bankrupt or have any county court judgments recorded against you. We currently use Credit Safe as a credit reference agency.</i></p>	<p><i>Where a credit references search is considered necessary, the collection and processing of this personal data is necessary for the performance of our contract with you, or to take steps for entering into our contract with you.</i></p>
<p>Proof of ID (of your choice) Current signed passport</p>	<p><i>Where ID verification is required this information will be collected and processed to comply with our legal</i></p>

<p>Current Full UK or EEA photocard driving licence EEA Member State identity card National identity card (if photographic) Proof of address (of your choice) Utility bill issued within the last three months Local authority council tax bill for the current council tax year Bank, Building Society or Credit Union statement or passbook Original mortgage statement form a recognised lender issued in the last full year Council or housing association rent card or tenancy agreement for the current year Benefit book or original notification letter from the Benefits Agency Inland Revenue Self-assessment or tax demand Electoral Register entry NHS Medical Card</p>	<p>obligations. It may also be requested outside of those legal obligations where considered necessary for the performance of our contract with you, or to take steps for entering into our contract with you.</p>
<p>Business information (including trading name, type of business, business address, registered office) Business telephone number Fax number Website</p>	<p>If you work for a partnership or are a sole trader, this information may constitute your personal data and will be processed as it is necessary for the performance of our contract with you, or to take steps for entering into our contract with you.</p>
<p>Details of your current landlord (including Name, Address and Daytime telephone number)</p>	<p>Where a reference is considered necessary we will collect this personal data because It is necessary for the performance of our contract with you, or to take steps for entering into our contract with you.</p>
<p>Property you are interested in Purpose of use Details of your accountant (including Name and Address)</p>	<p>Where collected this will be requested and further processed on the basis that it is necessary for the performance of our contract with you, or to take steps for entering into our contract with you.</p>

How we use your personal data

We use the personal data set out above in accordance with the legal basis identified above and for the following purposes:

- Verifying your identity;
- Verifying your financial standing;
- Facilitating the entering into and management of the tenancy agreement with you;
- Maintaining the property (where relevant);
- Carrying out inspections of and entering into the property and surrounding land;
- Dealing with any queries, complaints, repairs or renewals and other covenant compliance issues;
- Facilitating payment of rental charges and deposits;
- Debt recovery;
- Providing you with information about alternative/prospective premises (where available and where appropriate i.e. nearing the end of your tenancy or where the property currently let to you is no longer suitable);
- Investigating bringing and defending legal claims in respect of our property and/or our staff, contractors or agents; and
- For the purposes of facilitating the sale of any part of our business or the property.

Retention of your personal data

We will only retain your personal data for as long as is necessary for the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. This shall include the following retention periods:

1. **In relation to tenancy applicants** – for the duration of the application process and, if you are successful, in accordance with the retention periods cited below or, if you are unsuccessful, for up to 6 months in order to keep a record of your application, respond to any questions from you and/or invite you to apply for any other properties that should become available.
2. **In relation to our tenants** – for the duration of your tenancy and for such period following your tenancy (or contract) with us, as is necessary for compliance with our legal obligations and/or internal policies or to protect ourselves in relation to any claim or other proceedings, which is typically a period of up to 12 years from the date contractual obligations or entitlements are concluded.

Disclosure and transfer of your personal data

Where lawful to do so, we may share your personal data with the following recipients:

- members of the Telereal Trillium group or Blackstone group (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006), for the administration for your employment (or other) relationship with us and our group, including in relation to pay rises, promotions, planning, office transfers, and restructuring;
- members of the Telereal Trillium group or Blackstone group or other third parties that provide services to us where those services assist in the processing of your personal data for the purposes described above (including, for example, the provisions of payroll). Such disclosures will be on the lawful basis of it being in our legitimate interest (such third parties include Civica and Show and Event Security Limited as well as Trade Unions, pensions providers and insurance providers);
- Network Rail Infrastructure Limited, as owner of the freehold of the Property, may require us to produce information relating to your tenancy to enable them to comply with their statutory duties under the Freedom of Information Act 2000.
- governmental and regulatory bodies and other third parties where required to do so by applicable law, such as to comply with a court order or a request from a regulator or similar legal process or where otherwise necessary to comply with a legal obligation or for the administration of justice. Such disclosures will be on the lawful basis of it being in our legitimate interest and/or necessary to comply with legal obligations;
- in the event that we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer (as applicable) of such business or assets; and
- third parties concerned or their professional advisors, in the event of a merger, acquisition, or any form of sale of some or all of our assets. In the event of such a transaction, the personal information held by us may be among the assets transferred to the buyer. Such disclosures will be on the lawful basis of it being in our legitimate interest.

In addition, anonymised data reports (if relevant) collected via our system will be disclosed to our shareholders, Telereal Trillium and Blackstone (the **Shareholders**).

The Shareholders may disclose your personal data to the following parties:

- our legal advisors where necessary for the purposes of obtaining legal advice;
- the relevant Police Authority following an approved request for information;
- relevant Authorities legally seeking recovery of tax, duties and business rates; and
- under the Freedom of Information Act 2000, the Freedom of Information (Scotland) Act 2002, or The Environmental Information Regulations 2004, subject to the relevant exemptions.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not transfer your personal data outside the European Economic Area. However, there may be circumstances in which we share your personal data with our shareholders and other members the Telereal Trillium or Blackstone Group. Those entities might be located outside of the European Economic Area such as in the British Virgin Islands. In those circumstances, we will only make such transfers in accordance with the General Data Protection Regulation (including by entering into appropriate standard contractual clauses).

In addition to the specific circumstances outlined above, we reserve the right to disclose your personal data as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator, national security, for the purposes of public importance or any other legal or investigatory process involving us. Should we, or any of our affiliated entities, be the subject of a takeover, divestment or acquisition we may disclose your personal data to the new owner of the relevant business and their advisors on the basis of our legitimate interest.

Your legal rights

Data protection laws give you a number of legal rights, which are briefly summarised below, in relation to any personal data about you which we hold.

Your right	What does it mean?	Limitations and conditions of your right
Right of access	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like us to provide to ensure that our disclosure meets your expectations. We must be able to verify your identity and we may charge a 'reasonable fee', if we think that your request is excessive, to help us cover the costs of locating the information you have requested. Your request may not impact the rights and freedoms of other people, eg privacy and confidentiality rights of other individuals.
Right to data portability	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
Rights in relation to inaccurate personal or incomplete data	You may notify us of any changes to your personal data and have it corrected or completed, as applicable. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details.	This right only applies to your own personal data. When exercising this right, please be as specific as possible.
Right to object to data processing	You have the right to object to our processing of your personal data.	This right includes objecting to processing including for: (i) for direct marketing; (ii) for research or statistical purposes; or (iii) where processing is based on legitimate interests.
Right to restrict data processing	You may request that we stop processing your personal data (other than storing it),	This right only applies if you if: (i) you contest the accuracy of it (until the accuracy is verified); (ii) you believe the processing is against the law; (iii) you believe that we no longer need your data for the purposes for which it was collected, but you still need your personal data to establish or defend a legal claim; or (iv) you object to the processing, and we are verifying whether our legitimate grounds to process your personal data, override your own rights.

Right to erasure	Subject to certain conditions, you are entitled to have your personal data erased (also known as the “ <i>right to be forgotten</i> ”), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not always be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims. The reasons will be notified to you, if applicable, at the time of your request.
Right to withdrawal of consent	If our processing of your personal data is based on consent that you previously gave us (by a clear affirmative action) you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing and will not affect the lawfulness of any processing carried out before you withdraw your consent. In addition, if you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

How to contact us

If you have any questions or concerns about this Privacy Notice or wish to exercise any of your legal rights, please contact us by email at data.protection@thearchco.com or by post at:

Data Protection Manager
The Arch Company Services Limited
6 Burrell Street
London
SE 1 0UN

Further information can be found on the Archco web page at www.thearchco.com

Updates to this Privacy Notice

This Privacy Notice was last updated on 4 February 2019. We reserve the right to amend this Privacy Notice from time to time. If we decide to change this Privacy Notice, we will make you aware of these changes by post or email.

Complaints

You can make a complaint about our data processing activities by contacting us using the contact details noted above.

Alternatively, you may make a complaint to the UK Supervisory Authority which is the Information Commissioner’s Office by visiting their website at www.ico.org.uk, by phoning 0303 123 1113 (local rate) / 01625 545 745 (national rate) or by writing to Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

We always appreciate the opportunity to discuss and resolve your concerns before you make a complaint to the Information Commissioner’s Office.