

Ground Floor, 58 Castle Walk Reigate, Surrey RH2 9PX

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ST Walsh LLP Privacy Statement

Information we collect

To fulfil your legal obligations under the terms of your lease and to fulfil our role as Managing Agent and /or Freeholder, you must provide us with certain information (which you authorised either via your Solicitor on purchase or you have personally provided it to provide to us), such as your name, email address, postal address, property address etc. You may also choose to provide us with additional personal information.

Why we need your information and how we use it

We rely on a number of legal bases to collect, use, and share your information, including:

- As needed to provide our services, such as when we use your information to fulfil your obligations under the lease, to deal with issues, or to provide assistance.
- If necessary to comply with a legal obligation or court order or in connection with a legal claim, such as retaining information about your property, account statements if required by law.
- As necessary for the purpose of our legitimate interests, if those legitimate interests are not
 overridden by your rights or interests, such as providing and improving our services. We use
 your information to provide the services you requested and in our legitimate interest to
 improve our services.

Information Sharing and Disclosure

Information about our leaseholders is important to our business. We share your personal information for very limited reasons and in limited circumstances, as follows:

- Solicitors/legal services. We share information with Solicitors as necessary to provide information on your account and property in the events such as, not restricted to, the sale of, reportage of or lease extension.
- Service providers. We engage certain trusted third parties to perform functions and provide services to our shop, such as delivery companies. We will share your personal information with these third parties, but only to the extent necessary to perform these services.
- Business transfers. If we sell or merge our business, we may disclose your information as part of that transaction, only to the extent permitted by law.
- Compliance with laws. we may collect, use, retain, and share your information if we have a good faith belief that it is reasonably necessary to: (a) respond to legal process or to government requests; (b) enforce our agreements, terms and policies; (c) prevent, investigate, and address fraud and other illegal activity, security, or technical issues; or (d) protect the rights, property, and safety of our customers, or others.



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Data Retention

We retain your personal information only for as long as necessary to provide you with our services and as described in our Privacy Policy. However, we may also be required to retain this information to comply with our legal and regulatory obligations, to resolve disputes, and to enforce our agreements. We generally keep your data for the following time periods: 7 years.

Transfers of personal information outside the EU

We may store and process your information through third-party hosting services in the US and other jurisdictions. As a result, we may transfer your personal information to a jurisdiction with different data protection and government surveillance laws than your jurisdiction. If we require to transfer information about you outside of the EU, we rely on Privacy Shield as the legal basis for the transfer.

Your rights

If you reside in certain territories, including the EU, you have a number of rights in relation to your personal information. While some of these rights apply generally, certain rights apply only in certain limited cases. We describe these rights below:

- Access. You may have the right to access and receive a copy of the personal information we hold about you by contacting me using the contact information below.
- Change, restrict, delete. You may also have rights to change, restrict our use of, or delete your personal information. Absent exceptional circumstances (like where we are required to store data for legal reasons) we will generally delete your personal information upon request.
- Object. You can object to (i) our processing of some of your information based on our legitimate interests and (ii) receiving marketing messages from us after providing your express consent to receive them. In such cases, we will delete your personal information unless we have compelling and legitimate grounds to continue using that information or if it is needed for legal reasons.
- Complain. If you reside in the EU and wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local data protection authority.

How to Contact Me

For purposes of EU data protection law, I, Sam Walsh, am the data controller of your personal information. If you have any questions or concerns, you may contact me at sam.walsh@stwalsh.com (please CC sarah.walsh@stwalsh.com). Alternately, you may mail me at: ST Walsh LLP, Ground Floor, 58 Castle Walk, Reigate RH2 9PX