



BUSINESS PRIVACY NOTICE

Under the Data Protection legislation; particularly the General Data Protection Regulations; we are required to write to you to ensure that you are aware that we; Southend Seedbed Business Centre; are maintaining certain personal information about you, and to confirm why we need to maintain it.

When data including personal information is collected, used, stored and managed then the new General Data Protection Regulation (GDPR) requires that we tell individuals what we are doing with the information. The GDPR sets out the information that we should supply to individuals and when.

The Southend Seedbed Business Centre is committed to protecting your privacy and this Privacy Notice explains how we use the information we maintain about you and how we protect it.

We have a Data Protection Officer who makes sure we respect your rights and follow the law. If you have any concerns or questions about how we look after your personal information, please contact the Data Protection Officer, Barry Robins, at barry.robins@southend-seedbed.co.uk or by calling 01702 293070.

This privacy notice may be updated from time to time and we will communicate any changes to you and publish the updated notice on our website.

Lawful basis

The first principle requires that we process all personal data lawfully, fairly and in a transparent manner. Processing is only lawful if you have a lawful basis under Article 6. And to comply with the accountability principle in Article 5(2), you must be able to demonstrate that a lawful basis applies. If no lawful basis applies to your processing, your processing will be unlawful and in breach of the first principle. Individuals also have the right to erase personal data which has been processed unlawfully. The individual's right to be informed under Article 13 and 14 requires us to provide information about our lawful basis for processing.

Lawful Basis

Under the GDPR regulations we are allowed to process certain information under our declared lawful bases, for which we will be processing data which includes your personal information. The lawful basis for processing data for the Southend Seedbed Business Centre are;

- **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract
- **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).

Why we use your personal information

Do you know what personal information is?

Personal information can be anything that identifies and relates to a living person. This can include information that when put together with other information can then identify a person. For example, this could be your name and contact details.

Should we ask you to provide certain information by which you can be identified then you can be assured that it will only be used in accordance with this privacy statement.



SEEDBED BUSINESS CENTRE – DATA PROTECTION STATEMENT

We may change this policy from time to time by updating the Data Protection statement on our website. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 1st May 2018.

The information we collect and maintain

We collect and process various categories of personal information; all in connection with the license agreement; including basic information such as name and address, contact information including phone numbers of your business and business email addresses, demographic information such as postcode, rental levels and service charges, other information relevant to the license agreement that exists between us; this includes your signature for the license agreement and site regulations.

Most of this information will have been provided by you, or created through the contract process.

There are also occasions where your data will be collected via our website through the process of you advertising your business; or responding to sales adverts on the website. This information will include telephone numbers and email addresses, and a brief description of your business activities.

Personal data will also be collected from businesses contacting the Seedbed Business Centre via our website as part of an enquiry as to available business units. This data would include a businesses' name and address, contact telephone numbers. This information is processed by the website controllers and the Seedbed Business Centre's data processor, currently Barry Robins.

The storage of personal data will be via a range of different media; PC/ laptop hard drives; cloud based storage; USB data storage; hand-held mobile devices. As stated under 'security' (see below) we have a range of security measures in place to keep this data safe and secure. We would confirm that, where data is stored in 'the cloud' it may be transferred to and stored in countries outside of the European Economic Area (EEA) and maybe processed by people outside of the EEA. This will be the case when data is either provided or processed by our website provider Silkstream. You can obtain further information about the data protection procedures of Silkstream by visiting the following link; www.silkstream.net/privacy-policy.html.

What we do with the information we gather

We require this information as part of our contract terms and legal basis, and, in particular, for the following reasons:

- To maintain our services to you under the license agreement
- To negotiate or confirm annual rentals
- Our own internal record keeping
- In case of any dispute between us
- In case of emergencies
- As evidence that you have agreed to certain conditions
- As part of an enquiry for tenancy opportunities

This information will be processed by us in various ways, so we are able to maintain our contracts of tenancy with you. We may contact you by email, phone, fax or mail.

How do we process your personal data?

We comply with our obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data only in connection with the licence agreement we have with you for your tenancy at The Seedbed Business Centre, or as a result of an enquiry for tenancy, or as a result of your advertising on the SBC website.



SEEDBED BUSINESS CENTRE – DATA PROTECTION STATEMENT

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect and maintain.

The information retained will be stored in password protected documents, all passwords will be encrypted.

Your personal data will be treated as strictly confidential, and should we feel (although this is very unlikely) that your personal data needs to be shared, we will ensure we contact you first to obtain your consent.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

- whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes
- if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us

We will not sell, distribute or disclose your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about the activities and services of Seedbed Business Centre which we think you may find interesting. If you tell us that you not wish this to happen we will not send you the information.

You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you please write to the Seedbed Business Centre.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

Your rights

You have the right to ask to see any information we hold about you by submitting a 'Subject Access Request' to the Data Protection Officer. You also have the right to ask for information which you believe to be incorrect to be rectified.

If you are concerned about the way your information is being handled, please contact us using the above details. If you are still unhappy you have the right to complain to the Information Commissioner's Office.

Retention of your personal data

We keep your personal data for no longer than reasonably necessary, but will be for the duration of the contract and for a period of 12 months following the end of the contract. We may elect to retain your personal data for longer periods in case of any legal claims, complaints, or other legal purposes.



SEEDBED BUSINESS CENTRE – DATA PROTECTION STATEMENT

Your rights and your personal data

Unless subject to an exemption, under the GDPR, you have the following rights with respect to your personal data;

- The right to request a copy of your personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary for us to retain such data
- The right to withdraw your consent to the processing of your personal data at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to lodge a complaint with the Information Commissioners Office

Transfer of Data Abroad

We will only transfer your information where lawfully permitted and in compliance with applicable laws. We have no intention to transfer any of your personal data to countries or territories outside the EU. Should this change for any reason, we will make sure that we request your permission first, provide you with details of how the data will be protected, together with details of how to obtain copies of the relevant safeguards.

Accuracy

We take reasonable steps to ensure that personal information is accurate, complete, and current. Please note that you have shared responsibility with regard to the accuracy of your personal information. Please notify us of any changes to your personal information or that of your beneficiaries or dependents.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Director of the Seedbed Business Centre, Barry Robins.

If you wish to raise a complaint on how we have handled your personal data you can contact the Information Commissioners Office (ICO). For more information, visit www.ico.org.uk.