

## **Privacy Statement for The Sudbury Estate**

The Sudbury Estate (as defined in Note 1) takes the protection of your privacy very seriously. We will only use your personal information in our dealings with you, and to meet our legal responsibilities.

### **How do we collect information from you?**

We obtain information about you during the course of our dealings with you and when you use our website, for example, when you contact us.

### **What type of information do we collect from you?**

The personal information we collect from you will vary depending on our dealings with you. The personal information we collect might include your name, address, telephone number, email address, your Unique Tax Reference (UTR) number (for self-employed tenants), your National Insurance number, bank account details, your IP address, which pages you may have visited on our website and when you accessed them.

### **How is your information used?**

In general terms, and depending on our dealings with you, we may use your information to:

- Contact you by post, email or telephone
- Verify your identity where this is required
- Understand your needs and how they may be met
- Maintain our records in accordance with applicable legal and regulatory obligations
- Process financial transactions
- Prevent and detect crime, fraud or corruption

We are required by legislation, other regulatory requirements and our insurers to retain your data where we have ceased to deal with you. The period of data retention varies but is typically five or six years. To ensure compliance with all such requirements, it is our policy to retain all data for a period of six years.

### **Who has access to your personal data?**

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

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

Any of our staff with access to your information have a duty of confidentiality that they are required to adhere to.

### **Third Party Service Providers working on our behalf**

We may in some cases pass your information to third party service providers for the purposes of completing tasks and dealing with you.

Whenever we use third party service providers, we disclose only the personal information that is necessary to deliver our service and they are required to keep your information secure and not to use it for their own purposes.

We will not release your information to third parties unless you have requested that we do so, or we are required to do so by law, for example by a court order or for the purposes of prevention and detection of crime, fraud or corruption.

### **How you can access and update your information**

Keeping your information up to date and accurate is important to us. We commit to regularly review and correct where necessary the information that we hold about you. If any information changes, please let us know by using the contact details below.

### **Security precautions in place to prevent the loss, misuse or alteration of your information**

We have put security measures in place to prevent your information from being accidentally lost, used or accessed in an unauthorised way. We also limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

Your data will usually be processed in our office in the UK. However, to allow us to operate efficient digital processes, we may need to store information in servers located outside the UK, but within the European Economic Area (EEA). We take the security of your data seriously and so our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.

### **Your rights in connection with personal data**

*Access to your information:* You have the right to request a copy of the personal information about you that we hold.

*Correcting your information:* We want to make sure that your personal information is accurate, complete and up to date. You may ask us to correct any personal information about you.

*Deletion of your information:* You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- You have validly objected to our use of your personal information – see ‘Objecting to how we may use your information’ below
- Our use of your personal information is contrary to law or our other legal obligations

*Restricting how we may use your information:* In some cases, you may ask us to restrict how we use your personal information. The right might apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

*Objecting to how we may use your information:* Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

*Withdrawing consent to use your information:* Where we use your personal information with your consent, you may withdraw that consent at any time and we will stop using your personal information for the purposes for which consent was given.

Please contact us as set out in ‘Contact information’ below if you wish to exercise any of these rights.

### **Changes to this privacy notice**

We keep this privacy notice under regular review and will place any updates on our website.

You can get paper copies of this privacy statement by emailing [office@sudburyestate.com](mailto:office@sudburyestate.com).

This privacy statement was last updated on 7<sup>th</sup> June 2018.

A copy can be viewed at The Estate Office, Sudbury, Ashbourne, Derbyshire, DE6 6HT on a Monday or Thursday by appointment only.

### **Contact details**

If you have any questions regarding this notice, please email [office@sudburyestate.com](mailto:office@sudburyestate.com).

### **Complaints**

We seek to resolve directly all complaints about how we handle your personal information but you also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's contact details are:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545745

Website: <https://ico.org.uk/concerns>

### **Note 1**

Throughout this statement the term "The Sudbury Estate" includes, but is not restricted to, the following entities:

The Sudbury Estate  
Sudbury Farming Partnership  
The Sudbury Settlement  
The J. E. Fitzalan Howard Trust  
The A. R. Fitzalan Howard Trust  
The 10<sup>th</sup> Lord Vernon's Will Trust