



## Helical plc's privacy notice

---

Helical is committed to ensuring that your privacy is protected and our use of your personal information is governed by this Privacy Notice. In this notice, “Helical”, “our” and “we” each mean all the companies in the Helical plc group which collect and use your information in the manner set out in this Privacy Notice. Any reference to “you” or “your” refers to anyone whose personal information we process.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the notice. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

- 1. Important information and who we are**
- 2. The data we collect about you**
- 3. How is your personal data collected?**
- 4. How we use your personal data**
- 5. Disclosures of your personal data**
- 6. International transfers**
- 7. Data security**
- 8. Data retention**
- 9. Your legal rights**
- 10. Glossary**

### **1. Important information and who we are**

#### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Helical plc collects and processes your personal data.

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

#### **Controller**

Helical plc is the controller and responsible for your personal data.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Company Secretary using the details set out below:

#### **Contact details**

Controller: Helical plc

Name of company secretary: Mr James Moss

Email address: [jm@helical.co.uk](mailto:jm@helical.co.uk)

Postal address: 5 Hanover Square, London, W1S 1HQ

Telephone number: 020 7629 0113

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



## **Changes to the privacy notice and your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect your full name and contact details (such as phone number, email addresses and postal addresses) from you whenever you engage with us.

In addition, if you are providing us with goods or services, or we are providing you with a service, we may also collect the following information relating to your identity:

- Bank account details to arrange for the payment of invoices or the collection of payments
- CCTV images for site security if you visit our office
- Your dietary requirements if you attend a hospitality event

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **3. How is your personal data collected?**

We collect data from and about you through direct interactions. You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise.

## **4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests
- Where we need to perform the contract, we are about to enter into, or have entered into with you.
- Where we need to comply with a legal or regulatory obligation
- Where you have given us your consent to process your personal data.



In more limited circumstances we may also use your personal data when the following legal bases apply:

- Where we need to protect your interests (or someone else’s interests); and/or
- Where it is needed in the public interest or for official purposes

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us using the details provided at the beginning of this notice.

### **Other uses of your personal information**

If we sell any part of our business and/or integrate it with another organisation your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their advisers. If this occurs the new owners of the business will only be permitted to use your information in the same or similar way as set out in this privacy notice.

We will share personal information with our regulators, governmental or quasi-governmental organisations, law enforcement authorities and with courts, tribunals and arbitrators as may be required from time to time in order to comply with our regulatory and legal obligations.

Where we use third party services providers who process personal information on our behalf in order to provide services to us. This may include IT systems providers, property contractors, property consultants, marketing agencies/website managers, lawyers, banks and third-party screening agencies for the purposes of the prevention and detection of crime.

We may share your personal information with any person working within the Helical Group on a need to know basis to ensure we are able to perform our obligations to you.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us using the details provided at the beginning of this notice if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To engage in a, or manage our, relationship with you.	(a) Contact	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (to keep our records updated and to enable engagement with you).



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To administer our business.	(a) Contact (b) Bank account details	(a) Necessary for our legitimate interests (for running our business, provision of administration services and in the context of a business reorganisation or group restructuring exercise).  (b) Necessary to comply with a legal obligation.  (c) Performance of a contract with you.
To protect our business, including ensuring the safety of our staff and visitors.	(a) Contact (b) CCTV images (c) Dietary requirements	(a) Necessary for our legitimate interests (for running our business, provision of administration services, to carry out due diligence checks and in the context of a business reorganisation or group restructuring exercise).  (b) Necessary to comply with a legal obligation.  (c) Performance of a contract with you.
To develop our understanding of the real estate sector and review our strategy.	(a) Contact	(a) Necessary for our legitimate interests (to engage with you to share best practice and discuss sector updates and trends).
To promote our business, brands and products.	(b) Contact	(a) Necessary for our legitimate interests (to send you information from time to time after you have engaged us to provide services or receive services from us either which may be similar and of interest to you or where you have expressly indicated that you would like to receive such information. You have the right to opt out of receiving this information at any time).  (b) Consent - where you have registered to receive marketing information and updates and you have provided your consent for us to process your personal data for this purpose.



## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. We have established the following personal data control mechanisms:

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Helical plc for marketing purposes.

### Opting out

You can ask us to stop sending you marketing messages at any time by following opt-out links on any marketing message sent to you or by contacting us, at any time, using the details provided at the beginning of this notice.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us by using the details provided at the beginning of this notice.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Internal Third Parties as set out in the ***Glossary***.
- External Third Parties as set out in the ***Glossary***.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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.

## 6. International transfers

We do not transfer your personal data outside the European Economic Area **(EEA)**.

## 7. Data security

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.



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

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us using the details provided at the beginning of this notice.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the following information to find out more about these rights:

**Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**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.

**Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request

**Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.



**Request the transfer 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. Note that 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.

**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.

If you wish to exercise any of the rights set out above, please contact us by using the details provided at the beginning of this notice.

#### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

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.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **Lawful basis**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contact us using the details provided at the beginning of this notice.

**Performance of contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.



## **Third parties**

### **Internal third parties**

Other companies in the Helical Group acting as joint controllers or processors and who are based the United Kingdom and provide system administration services and undertake leadership reporting.

### **External third parties**

- Service providers acting as processors based the United Kingdom who provide IT and system administration services.
- Service providers acting as processors based the United Kingdom who provide communication and investor relations services.
- Service providers acting as processors based the United Kingdom who provide real estate/property related services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.