



PRIVACY NOTICE

LETTING & MANAGEMENT OF COUNCIL LAND & PROPERTY

WHAT IS THE PURPOSE OF THIS DOCUMENT?

Three Rivers District Council is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you in connection with the letting and management of the Council's land and property assets where you are or may become an occupier.

Three Rivers District Council is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

DATA PROTECTION PRINCIPLES

We will comply with data protection legislation. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

THE KIND OF INFORMATION WE HOLD 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).

In order to process your application for lettings of Council land and property assets or in connection with the management of Council-owned land & premises, we will collect, store, and use the following categories of personal information about you:

- personal contact details such as your name, title, company, addresses, telephone numbers, and email addresses;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;

- any credit/debit card, bank account or other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through our website(s), IP addresses, user names and other IT system identifying information;
- copies of your business or organisations risk assessments or such documentation that the Council is entitled to request;
- referees' contact information which you may have provided to support your application for business premises, including previous landlord; trade, bank and accountancy references and records;
- details of any of your employees, vehicles or other assets;
- quotations, invoices, estimates, tender returns and supporting documentation;
- images in photo and/or video;
- your marketing preferences so that we know whether and how we should contact you.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about you and your business directly from application forms, written correspondence, telephone calls, face to face or virtual meetings. In addition we will also collect information about you or from any referees or third parties that you authorise us to contact or information that may be held about you or your business that is published by you or third parties that is publicly accessible.

HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to.

The lawful basis for processing your personal data will be:

- You have given consent to the processing of your personal data for one or more specific purposes;
- Processing is necessary for the performance of a contract;
- Processing is necessary for compliance with a legal obligation.

The situations in which we will process your personal information are listed below.

- In consideration of applications to lease, licence or occupy land or premises belonging to the Council;
- In consideration of any licence to alter, licence to assign, sub-let or part with possession of the Council's land or premises where such right exists;
- To operate, manage, repair and maintain land or premises belonging to the Council;
- To consider applications for any easement, wayleave, right of way or other such application affecting Council land or premises.

If you fail to provide certain information when requested, we may not be able to permit you to occupy Council land or premises

DATA SHARING

We will share your personal information with third parties where required by law or where it is necessary to share with other internal departments or external organisations, utility providers and agencies that we are obliged to and for the detection and prevention of fraud and money laundering or in the compliance of statutory requirement.

Your personal information may be shared with and processed by:

- Utility providers and statutory undertakers;
- Landlord, Tenant or relevant other party with an interest within the Council's land or premises
- Your bank/building society, referees or third parties that you authorise us to contact on your behalf;
- Internal Council departments, such as our Legal Services, Revenue & Benefits, Leisure Services Teams or other such internal Council department;
- Police or other Enforcement Agency;
- The Council's BACs Bureau and bank for the management of any Direct Debits.
- Other such organisation where a statutory obligation exists for the Council to disclose information.

All of the Council's third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes and they may only process your personal information for specified purposes and in accordance with our instructions.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees and third parties who have a business need to process it. Third parties will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Information from you will be entered into electronic databases which are controlled by the Council and are held on a secure server at the Council's office and on a secure server in the UK.

Personal data will not be published without your express consent. Anonymised data may be used for statistical reporting purposes, but will not include any personal data.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

We will only retain your personal information 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 information, 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Personal data is only held as long as is necessary, unless superseded by statutory regulation, and disposed of securely when it is no longer needed.

Personal data will be retained for as long as you remain an occupier of Council land & property.

Personal data is reviewed and updated annually. Personal information is deleted after four years of inactivity.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

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

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

No fee usually required

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

However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

DATA PROTECTION OFFICER

The Council's Data Protection Officer (DPO) is responsible for overseeing compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO – see [the Data Protection page](#) for details.

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.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

PRIVACY NOTICE OWNERSHIP

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