

Locale Privacy Notice

Introduction

Welcome to the Locale privacy notice.

Locale respects your privacy and is committed to protecting your personal data. This privacy notice is intended to inform our Customers ('you') how we look after your personal data when you visit our Website/Portal and other portals we're responsible for, regardless of where you visit from, and tell you about your privacy rights and how the law protects you.

Please 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

1.1 Purpose of this privacy notice

This privacy notice aims to give you information on how Locale collects and processes your personal data through your use of this Website/Portal, including any data you may provide through this Website/Portal when you sign up to our newsletter.

This Website/Portal is not intended for children and we do not knowingly collect data relating to children.

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.

1.2 Who we are

Locale is a registered company and our registered address is: Prama House, 267 Banbury Road, Summertown, OX2 7HT. Locale is registered with the ICO under registration number Z9585836.

1.3 Our role as a Data Controller

Locale is a Data Controller, which means we are responsible for the personal data we process in relation to our own prospective, current and previous employees, to prospective, current and previous Customers (You) and to our prospective, current and previous Suppliers. This privacy notice covers how we process personal data relating to our Customers and Suppliers.

1.4 Our role as a Data Processor

1.4.1 Locale Portal

Locale is a Data Processor, which means we process personal data on behalf of our Customers. Our Customers ('You') are typically the Data Controller for personal data processed via the portal we provide to you. You trust us to process data about your tenants, residents, visitors to your site. We can only process personal data in accordance with your instructions and your purposes. Please refer to our Fair Processing Notice for how we handle personal data as a Data Processor for our Portal Customers.

If you sign up for certain services we offer through our portal, the personal data that you (the Customer) are responsible for as the Data Controller will be shared with a sub-Data Processor, who The Locale Group have partnered with to offer further additional services. We have taken our responsibility to select a sub-Data Processor who complies with all relevant data protection legislation seriously and have undertaken appropriate checks to ensure that the personal data processed will remain secure. Both Locale and the sub-Data Processor can only process the personal data in accordance with your instructions and for the purposes identified by you. We will notify you if the services you choose involve personal data being shared with partner companies.

1.4.2 Locale Consulting

Locale also provides consulting services such as project management, event management, stakeholder management, strategic marketing advice and practical marketing support to our Customers. If you engage us to provide these services, we will be acting as a data processor on your behalf. You trust us to process data about individuals involved in your projects or events, including attendees and hosts. We can only process personal data in accordance with your instructions and your purposes. We also provide a Fair Processing Notice for our Consulting Customers and for those involved in the Projects which we manage on behalf of our Customers. This is available upon request via email to GDPR@locale.co.uk.

(We will be referred to collectively as "Locale", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

1.4.3 Our role as a sub-Data Processor

In some circumstances, You (the Customer) may be engaged as a data processor by the Building Owner to manage the building on their behalf. In this case, the Building Owner is the data controller. They will have delegated authority to you as their data processor to engage us as a sub-data processor to deliver the portal product and associated services. We can only process personal data in accordance with your instructions and your purposes, as agreed in your data processing agreement with the Building Owner. Please refer to our Fair Processing Notice for how we handle personal data in the portal.

1.5 Contact details

Our full details are:

Locale

Data privacy manager is Marta Gonçalves

gdpr@locale.co.uk

Prama House, 267 Banbury Road, Summertown, OX2 7HT

+44(0)1865 249758

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

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

This version was last updated on 14th May 2024 and historic versions can be obtained by contacting us.

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.

1.7 Third-party links

This Website/Portal may include links to third-party Website/Portals, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party Website/Portals and are not responsible for their privacy statements. When you leave our Website/Portal, we encourage you to read the privacy notice of every Website/Portal you visit.

2. The data we collect about you

2.1 The data we collect

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 and there is no possibility of identifying the individual from our own data, or linked or publicly available data, which we may have access to. (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website/Portal.
- **Profile Data** includes your username and password, purchases or orders made by you, your business interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our Website/Portal, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website/Portal feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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.

2.2 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 use different methods to collect data from and about you are including through:

• **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you

- apply for our products or services;
- create an account on our Website/Portal;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

• **Automated technologies or interactions.** As you interact with our Website/Portal, we may collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Some of this Technical Data is essential to enable our Website/Portal to function properly, which is necessary for us to process. Other Technical Data gives us insight into how individuals use our website, which is not strictly necessary and we will ask for consent prior to setting cookies or similar technology on your devices.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties: analytics providers such as Google, based outside the EU.

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 we need it to perform the contract we are about to enter into or have entered into with you.
- Where we need it to perform the contract we have entered into with your organisation, or an organisation to which you or your organisation are affiliated
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, other than if you sign up for our e-mail newsletter via our Website and for the use of non-essential cookies on our Website/Portals. You have the right to withdraw consent marketing at any time by contacting support@locale.co.uk or calling us on +44(0)1865 249758 .

4.1 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 based on more than one lawful ground, depending on the specific purpose for which we are using your data. 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, please contact us on: gdpr@locale.co.uk.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a prospect or contact for a new customer	(a) Identity (b) Contact	Performance of a contract with you Internal forms and Cognito to gather set up information to start our Portal services with you.
To process and deliver orders including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Marketing Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To deliver the consulting services which we have been contracted to deliver by our Customers	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

(b) Asking you to leave a review or take a survey	(d) Marketing and Communications	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this Website/Portal (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Performance of a contract with you (provision of administration and IT services to you) (b) Necessary for our legitimate interests (network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (c) Necessary to comply with a legal obligation
To deliver relevant Website/Portal content and advertisements to you at your request, and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website/Portal, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) Consent (for non-essential cookies – including Google Analytics or similar technologies to enable us to understand how the Website/Portal is used) (b) Necessary for our legitimate interests (to define types of

		customers for our products and services, to keep our Website/Portal updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

4.2 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established a link at the bottom of any marketing information we send you and you will always have the choice to:

- Change how you receive these emails
- You can update your preference
- Unsubscribe from this list

4.3 Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing. As outlined above, we process your personal data on the basis of legitimate interests for marketing purposes, and you will always have the opportunity to unsubscribe from receiving such communications.

4.4 Opting out

You can ask us to stop sending you marketing messages at any time by calling into support or by sending us an email to support@locale.co.uk or by following the opt-out links on any marketing message sent to you.

If you opt-out of receiving marketing messages, we will not send you any further marketing communications. However, we may still need to send you operational, update or support

messages in relation to any contract we hold with you for the provision of products/services or other associated transactions (such as warranty registrations, product/service experiences etc).

4.5 Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Cookies provide information about individuals' usage of the website, which may identify you as the same individual even if we do not know your name, we can identify location, IP address and device information (see Technical Data above). As such, we make sure you have a choice about the cookies that are placed on your device for our statistical purposes by Google Analytics, which help us to understand more about the ways in which people use our website. We would appreciate it if you opt-in to accept these cookies when the website asks you, as it will help us to improve it over time.

Cookie	Name	Purpose	More information
_ga _gid _gat	Google Analytics	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information, including IP address, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	Click here for an overview of privacy at Google.

Necessary Cookies

Necessary cookies enable core functionality such as page navigation and access to secure areas. The website cannot function properly without these cookies, and can only be disabled by changing your browser preferences. You can set your browser to refuse all or some browser cookies, or to alert you when Website/Portals set or access cookies. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org. If you disable or refuse cookies, please note that some parts of this Website/Portal may become inaccessible or not function properly.

4.6 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 Locale directly.

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 external third parties, and consent will be obtained from you prior to sharing. Currently we do not currently share your data with third parties, but if this changes in the future we will of course notify you:

- 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 may store or transfer some or all of your personal data to countries that are not part of the UK or European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data are treated just as safely and securely as they would be within the UK and under our Data Protection Legislation as follows:

- We share your data with external third parties, (e.g Mailchimp), that are based outside of the UK & EEA. The following safeguards are applied to such transfers:
 - o We will only transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the Information Commissioner’s Office.
 - o We assess the risk of transferring personal data to a third country, taking into account key factors around the nature of the data to be transferred, balanced against privacy and other human rights laws within the country. We use the International Data Transfer Risk Assessment provided by the Information Commissioner's Office to make this assessment.
 - o We use specific contracts with external third parties that are approved by the Information Commissioner’s Office and European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the European Commission and the ICO
 - o Where we transfer your data to a third party based in the US additional steps have been taken to ensure your personal data will be treated as securely and safely as it

would be in the UK and under the GDPR. We check whether or not the US-based organisation is certified to the UK extension to the EU-US Data Privacy Framework. If not, we continue to rely on signed Data Processing Agreements with our data processors based on model contract clauses provided by the Information Commissioner's Office and European Commission (also known as 'standard contract clauses'), which impose suitable data protection standards on a contractual basis.

· On occasion, we may share your data with employees or contractors who may be based in third-countries. The data they access remains in the UK, and in addition to the above, we ask them to adhere to our data protection policies as part of their work with us.

Please contact us using the contact details provided above for further information about the particular data protection mechanisms used when transferring your personal data to a third country.

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

How long will you use my personal data for?

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 aspects of your personal data are available in our retention policy which you can request from us.

Also, by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for tax and accounting purposes.

In some circumstances you can ask us to delete your data: see [*Request erasure*] below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

9.1. Personal data

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Be informed** that we are processing your personal data. This means we will let you know at the earliest opportunity that we are processing personal data about you.
- **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 gdpr@locale.co.uk for further details and access rights.

9.2 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.

9.3 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.

9.4 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

10.1 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 contacting gdpr@locale.co.uk .

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.

10.2 Third Parties

• Internal Third Parties

There are currently no internal third parties only Locale staff, who are based in the EEA and, occasionally, in other countries around the world, and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Online service providers such as MailChimp and Survey Monkey to help facilitate our communications with prospective and current customers.

Last updated 14/05/2024