

MULGRAVE ESTATE (“the Estate”)

PRIVACY NOTICE

This Notice was last updated on 21 May 2018

The Mulgrave Estate is a commercially operated rural Estate wholly owned by the Marquis of Normanby.

The Estate owns and rents out property as well as providing certain other goods and services. To undertake these activities the Estate utilises your personal data.

This notice outlines your rights in respect of the personal data that we hold. These rights are set out in more detail at www.ico.org.uk and are regulated by the General Data Protection Regulation (GDPR) which is effective from 25 May 2018.

1. COLLECTION AND USE OF PERSONAL DATA

- You may give your personal details to the Estate directly, by making a booking for a holiday cottage, applying to lease a property, ordering goods and services, applying for work either as an employee or contractor/supplier or,
- Your details may have been identified via publicly available sources in relation to your professional history (e.g. LinkedIn or the CLA website).
- In some circumstances, your personal details may have been provided to us by another person, e.g. a referral.

In any case the Estate must have a legal basis for processing your personal data. We will only use your personal data in accordance with the terms of a contract and our privacy notice.

1.1 PURPOSE OF PROCESSING AND LEGAL BASIS

The Estate will collect and process your personal data, which may include sensitive data, for the purposes of employment or the provision of goods and services including the short-term letting of property.

The legal bases we rely upon when processing your personal data are:

Legal Base	Example of Purpose
Legal Obligation	To comply with the law, e.g. HMRC and Tax legislation.
Contractual Obligation	Lease obligations, supply agreements, employment.
Legitimate Interest	For marketing and public relations in relation to our services in order to improve the services we offer.
Consent	Where we have explicitly obtained your consent to share your data with other parties e.g. to provide an employment or credit reference about our service provision.
Public Interest	<i>Does not apply.</i>
Vital Interest of Data Subject	In the event of an emergency, the limited information we hold on you would be provided to emergency services as necessary.

1.2 RECIPIENT/S OF DATA

Where we need to share your personal data, we have contracts and data sharing agreements in place with the recipients that require them to treat your information as confidential and ensure the continued protection of your data whilst in their possession. The Estate will process your personal data with the following recipients:

- Governing bodies and authorities as required by law,
- Our software providers,
- Third party suppliers, e.g. business associates and professional advisers, such as external consultants, technical and IT support functions and independent auditors,
- Third party, where necessary to protect your vital interest, e.g. emergency services,
- Marketing technology platforms and suppliers,
- We may transfer your personal information to a third party as part of a sale of some or all our business and assets to any third party or a part of any business restructuring or reorganisation. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

2. AUTOMATED DECISION MAKING

The Estate does not use automated decision making, including profiling. Should the Estate intend to change this process you will be notified in advance.

3. DATA ACCESS RESTRICTION AND RETENTION

The Estate will retain your personal data and/or sensitive data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

4. WHERE SERVICES HAVE NOT BEEN PROVIDED

If we have not provided you/your organisation with our services for two consecutive years, your personal data will be deleted from our systems unless save where we believe in good faith that the law or other regulation requires us to preserve it.

4.1 WHERE SERVICES HAVE BEEN PROVIDED

Your personal details may be included in a number of documents created during our contract with you/your organisation. To comply with legal requirements e.g. tax legislation, your data will be kept for 7 tax years directly prior to the last date on which services were provided to you/your organisation.

Where the Estate has obtained your consent to process your personal data and sensitive personal data we will do so in line with the relevant schedule detailed above.

After expiry of that period your data will no longer be kept by the Estate.

5. SECURITY PRECAUTIONS IN PLACE TO PROTECT THE LOSS, MISUSE OR ALTERATION OF YOUR INFORMATION

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures, e.g.:

- encryption of our services and data;
- the review of our information collection, storage and processing practices, including physical security measures;
- the restriction of access to personal access to personal information;
- internal policies setting out our data security approach and training for employees, these include measures to deal with any suspected data breach.

6. YOUR RIGHTS

You have the following data protection rights:

- The right to be informed about the personal data the Estate processes on you,
- The right of access to the personal data the Estate processes on you,
- The right to rectification of your personal data,
- The right to erasure of your personal data in certain circumstances,
- The right to restrict processing of your personal data,
- The right to data portability in certain circumstances,
- The right to object to the processing of your personal data that was based on a public or legitimate interest,

- The right not to be subjected to automated decision making and profiling,
- The right to withdraw consent at any time.

Where you have consented to the Estate processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by emailing the Data Protection Manager at office@mulgrave.net

7. COMPLAINTS OR QUERIES

Any requests about the personal details held by the Estate or how we use this data or confirmation that you wish to exercise your rights under GDPR should be addressed to:

The Data Protection Manager

Estate Office
Mulgrave Castle
Lythe
Whitby
YO21 3RJ
Tel. 01947 893239
Email office@mulgrave.net

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.