

# BROWNLOW LIMITED

## Privacy Notice Clients / Customers

### Overview

At Brownlow Limited we take your privacy seriously and we are committed to protecting your personal data. We aim to be clear about how we use personal data and this privacy notice will inform you as to how we look after your personal data, what personal data we process and why. It includes the relevant requirements of the General Data Protection Regulation. This notice is addressed to individuals who are users of our services, website users and third parties. We refer to all these individuals as "client / customer" or "you" in this notice.

This Privacy Notice will give you information about:

1. Who we are and who is responsible for your personal data
2. Where you can contact us if you have any questions about how your personal data is processed by us
3. What types of personal data we process and where we get that personal data from
4. How we use your personal data and what our legal basis for doing so is
5. Who we disclose your personal data to and why
6. Whether we transfer any of your data internationally
7. How we store your data securely
8. How long we hold your personal data for
9. What rights you have in relation to your personal data and how you can exercise those rights.
10. Complaints

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

This privacy notice aims to give you information on how Brownlow Limited collects and processes your personal data through your dealings with us, including your use of this website or when you use any service we offer.

We are **Brownlow Limited (XR38654)** Our offices are located at **1 Bluestone Business Park, Moyraverty West Road, Craigavon BT65 5HU** and we can be contacted via telephone on **028 38344908** or by email: **info@brownlowlimited.co.uk**.

### **Third-party links**

This website may include links to third-party websites, 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 websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. Where you can contact us if you have any questions about how your personal data is processed by us

If you have any questions about this privacy notice, including any requests to exercise your legal rights (as set out in paragraph 9), please contact Brownlow Limited at [info@brownlowlimited.co.uk](mailto:info@brownlowlimited.co.uk) or telephone **028 38344908**. All written requests should be addressed to the Chairperson.

## 3. What types of personal data we process, where we get that personal data from

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

- **Identity data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact data** includes billing address, email address and telephone numbers.
- **Financial data** includes payment details.
- **Transaction data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical data** includes internet protocol (IP) address and other technology on the devices you use to access this website.
- **Profiling data** – includes personal information Brownlow Limited will use to make certain decisions about you which will be based on your previous interactions with the Organisation.
- **Marketing and communications data** includes your preferences in receiving marketing from us.

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) unless if one of the limited legal exceptions in GDPR applies. These include:

- Your explicit consent;
- Processing is necessary to protect your vital interests (for use in emergencies);
- Processing related to personal data which are manifestly made public by you;
- Processing is necessary for the establishment, exercise or defence of legal claims; and
- Processing is necessary for reasons of substantial public interest under UK law and which is proportionate to the aim pursued.

Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data 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 services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

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

We use different methods to collect data from and about you 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, and email or otherwise. This includes personal data you provide when you:

- Use our services (e.g. receive any information, advice and signposting);
- Participate in our events / workshops
- Participate in our Business Support Programmes
- Enquire and/or use our conferencing facilities, IT Suite
- Enquire and/or rent our managed workspace
- Give us some feedback

#### **Automated technologies or interactions**

As you interact with our website, we **do not** automatically collect Technical Data about your browsing actions. *We do not collect this personal data by using cookies.*

#### **Information obtained from third parties**

We may also collect information about you from other persons and this also forms part of your personal data. This includes information from:

- Armagh City, Banbridge & Craigavon Borough Council
- Armagh Business Centre Ltd
- Banbridge District Enterprises Ltd.
- Invest Northern Ireland
- Mayfair Business Centre Ltd
- Craigavon Industrial Development Organisation (CIDO Ltd)

- **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 to perform the contract we are about to enter into or have entered into with you.
- 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 you have expressly given us consent to process your personal data

- Where we need to comply with a regulatory obligation

### 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 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 register you as a new customer / client	(a) Identity (b) Contact	Performance of a contract with you. We cannot provide our services to you unless you provide us with your personal data.
To manage our relationship with you which will include:  (a) Notify you about information relevant to our services;  (b) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you. We cannot provide our services to you unless you provide us with your personal data.  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services). We balance this interest with the impact on you and it will assist us to provide the best service to you.  (d) Data subject has given consent to the processing of his or her specified marketing purposes
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance,	(a) Identity (b) Contact (c) Technical	(a) <i>Performance of a contract with you. We cannot provide our services to you unless you provide us with your personal data</i> (b) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group

support, reporting and hosting of data)		restructuring exercise). We balance this interest with the impact on you and it will assist us to provide the best service to you. (c) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) Necessary for our legitimate interests (to develop our products/services and grow our business). We balance this interest with the impact on you and it will assist us to provide the best service to you. (b) Data subject has given consent to the processing of his or her specified marketing purposes
To register you as a tenant of Brownlow Limited	a) Identity (b) Contact (c) Profile  (d) Marketing and Communications  (e) Financial (f) Transaction	(a) Performance of a contract with you. We cannot provide our services to you unless you provide us with your personal data.  (b) Necessary to comply with a legal obligation such as to provide Land & Property Services with your contact details.  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services). We balance this interest with the impact on you and it will assist us to provide the best service to you.

**Marketing**

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

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 **opted in**, via email and have requested information from us or purchased services from us/ expressed an interest in purchasing services and, in each case you have not opted out of receiving that marketing.

### **Third-party marketing**

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

### **Opting out**

You can ask us to stop sending you marketing messages at any time by following the **opt-out** links on any marketing message sent to you, by using the opt-out links on our website [www.brownlowlimited.co.uk](http://www.brownlowlimited.co.uk) or by contacting us at any time [info@brownlowlimited.co.uk](mailto:info@brownlowlimited.co.uk) or telephone **028 38344908**.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, business programme registration, service experience or other transactions.

### **Cookies**

As you interact with our website, we **do not** collect Technical Data about your browsing actions. We do not collect any personal data by using cookies.

- **Who we disclose your personal data to and why**

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**

Other companies acting as joint controllers or processors with Brownlow Limited and who are based in the EEA and who may provide IT and system administration services as well as undertake leadership reporting.

#### **External third parties**

- Service providers acting as processors based in the EEA who provide services including IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, business advisors, auditors and insurers based in the United Kingdom 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.
- Sub-contractors engaged in business support programme delivery on behalf of Brownlow Limited.
- Statutory bodies for legal purposes

- Armagh City, Banbridge & Craigavon Borough Council if you are registered on the Council run 'Go for It' programme or have requested to be signposted to one of the Council's business support programmes
- Invest Northern Ireland only if you have requested or agree to be referred for additional business support
- Southern Regional College only if you have requested or agree to be referred for additional business support
- Mayfair Business Centre Ltd only if you have requested or agree to be referred for additional business support
- Armagh Business Centre Ltd only if you have requested or agree to be referred for additional business support
- Craigavon Industrial Development Organisation (CIDO Ltd) only if you have requested or agree to be referred for additional business support
- Banbridge District Enterprises Ltd only if you have requested or agree to be referred for additional business support
- If you are a Brownlow Limited tenant, your information may be passed to 3rd party organisations including Land & Property Services or electricity suppliers

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. Data processing outside Europe**

Brownlow Limited is not normally required to send data outside of the EEA, but in the instance that this would be necessary we will ensure adequate safeguards are in place before doing so to ensure full compliance with the required legislation.

## **7. How we store your data securely**

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 the Information Commissioners Office (the "ICO") 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. We have set out the common retention periods for Personal Data we collect below. ***(Please note that these are standard timeframes and may need to be extended e.g. if a dispute emerges or there is a legal reason to continue to hold them).***

- |  |                                  |
|--|----------------------------------|
| • Business Support Programme Participation             | Max 6 years                      |
| • Business Support Programme (no further intervention) | Max 2 years                      |
| • Tenant of Brownlow Limited Business Parks            | Max 6 years after end of tenancy |
| • Bookings for Conference Facilities/ IT Suite         | Max 6 years                      |
| • Enquires for Facilities / Units                      | Max 2 years                      |
| • Attendance at Brownlow Limited Workshop              | Max 2 years                      |
| • Business Support General Enquiries                   | Max 2 years                      |

In some circumstances we may make anonymous 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. What rights you have in relation to your personal data and how you can exercise these rights**

You have the right to:

- **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 or "right to be forgotten". This enables you to ask us to delete or remove personal data where there is no lawful basis for us continuing to process it. You 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 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). You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases (other

than for direct marketing), we may demonstrate that we have compelling legitimate grounds to process your information which overrides 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. *This is known as a "data portability" right.*
- **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 via telephone on **028 38344908** or by email: **info@brownlowlimited.co.uk**.

#### **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. Complaints

If you are unhappy with how we are processing your Personal Data, please contact us to discuss via telephone on **028 38344908** or by email **info@brownlowlimited.co.uk**. All written complaints should be addressed to the Chairperson.

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)).  
Address: **Information Commissioner's Office 3rd Floor, 14 Cormac Place, Belfast, BT7 2JB**  
Tel: **028 9027 8757** or **0303 123 1114** Email: **ni@ico.org.uk**.

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

### **Changes to our privacy policy**

**We keep our privacy policy under regular review and we may update this Privacy Notice from time to time. We will place any updates on our website. This policy was last updated on the 25<sup>th</sup> May 2018. Customers will be informed where there is a material change and it will be on the website as and when required.**