

# Privacy Notice

At Wishtower we collect a small amount of data from clients and people (referred to as 'Data Subjects' in this document) who have demonstrated a legitimate interest in our products and services and who have shown an intent to purchase or find out more information about what Wishtower provides as a business.

Maintaining the security of your data is of paramount importance to us and we are committed to respecting your privacy rights.

We take your privacy seriously and will only use your information lawfully to keep you informed, process your order, manage your account and to provide the products and services you have requested from us. We don't ever share your personal data with third parties for financial gain or otherwise.

This notice provides you with information about:

- How we use your data
- What personal data we collect
- Who we share your data with
- How we ensure your privacy is maintained; and
- Your rights relating to your personal data
- Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (EU Regulation 2016/679, when applicable, the “GDPR”), and the EU Data Protection Directive (Directive 95/46/EC), the data controller is the Privacy Administrator, Wishtower, 23 Marshall Road, Eastbourne, East Sussex, BN23 9AD.

## **data subjects**

These data subjects are defined as:

- Existing clients across all our markets
- Prospective clients across all our markets
- Past clients across all our markets
- End clients who have expressed interest in Wishtower
- Key influencers who have expressed interest in our service, similar to our end clients
- Current employees who need to be kept informed about Wishtower’s external marketing
- Former employees who have expressed interest in keeping informed about Wishtower
- Suppliers
- Media contacts
- Sponsorship, partnership and trade association contacts

Collecting the following data enables Wishtower to administrate sales contracts with clients, in addition to keeping all ‘data subjects’ informed of the news and developments taking place at the company through targeted and relevant marketing communications.

Our communications are time-sensitive and we ensure that our product news & mailshots are occasional and not over-whelming.

## **data we collect from you**

Although the precise details of the personal information collected will vary according to the specific purpose for which we are collecting the information, we may collect and process the following data about you:

- Information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our website, subscribing to our service, posting material or requesting further services. We may also ask you for information when you report a problem with our website.
- If you contact us by phone, email or otherwise and is provided voluntarily, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our website including, but not limited to, traffic data, location data, web blogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- We may also collect behavioural and browsing data from you for the purposes of offering you a tailored or personalised online experience.
- We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about our clients' browsing actions and patterns and does not identify any individual. We collect some of this information using Cookies, see below and our cookies policy at here. We may also collect any personal information which you allow to be shared that is part of your public profile on a third party social network.
- We obtain certain personal information about you from sources outside our business. We may receive your personal information from other sources, such as: public databases, our supplier partners as well as from other third parties. For example, this other personal data helps us to:
  - provide the relevant services in an accurate manner;
  - review and improve the accuracy of the data we hold; and
  - improve and measure the effectiveness of our marketing communications

## **what data do we collect and store for all data subjects?**

We may collect and process the following data about you:

- First name and surname
- Correspondence address
- Email address
- Telephone and mobile numbers

## **what data do we collect and store for business contract purposes e.g. clients, prospective clients and suppliers?**

- First name and surname

- Company name
- Company status
- VAT number
- Registered office number
- Email address
- Contact telephone number(s)
- Registered business address or (if a sole trader) a proprietor's home address
- Telephone numbers and mobile numbers
- Credit requirements and limit if applicable
- Payment terms requirement

For our clients: We may hold bank and payment details on record to facilitate payments receipts or payments such as ground rents collected.

For our suppliers: In addition to the above information we hold bank and payment details. These are held securely with accounting and banking systems, with access strictly limited to relevant accounts payable staff only.

In order to fulfil our obligations when engaging in a business transaction, we require the above details, and by entering into a business contract with us, you have shown legitimate interest in receiving our communications. If at any point, you do not want to receive our communications, please get in touch using the details stated further down on this page.

### **other uses made of your data**

We use information held about you in the following ways:

- To ensure that content from our website is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To enhance your experience whilst using our website and portal.
- To notify you about changes to our service.
- We may use your personal information to contact you if there is any urgent issue to communicate to you where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any personal negative impact on your or your property.

### **third-party links**

Our 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.

## **where do we store your data?**

We store the above data for all 'data subjects' within our secure cloud-hosted server environment protected with antivirus and firewall software systems in the following databases:

- Secure password protected email system (Office365)
- Secure password protected email software system (Resident)

## **how do we use your data?**

Unless you ask us not to, we use the above data to send out periodic service charge notices and communications to enable you as one of our valued stakeholders to be kept informed about the news, events, projects, partnerships developments that take place at Wishtower.

We are the sole owners of the information collected. Only Wishtower staff have access to information that you voluntarily give us via email or other direct contact with you. We will not sell or rent this information to any third parties. We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organisation, other than as necessary to fulfil your request.

## **legal basis for processing your personal data**

The personal data that you provide to us in order to manage our contract with our client (Landlord, Freeholder, Resident Management Company or Right To Manage Company).

All other personal data is processed for our legitimate interests (as set out below) and to comply with our legal obligations.

## **what are your rights?**

You can unsubscribe to any of Wishtower's email marketing mailshots at any time by either contacting the main point of contact (as shown below) or by clicking the opt out / unsubscribe button on the email marketing mailshots you receive. The unsubscribe button will usually be located at the header or footer of the mailshot.

All data subjects have the right to be erased from Wishtower's databases, unless minimum statutory data retention regulations state otherwise.

## **how long do we store your data?**

We will store your data for management purposes in the pursuance of our management contract or subsequently for the statutory minimum terms

## **in accordance with the GDPR, you will be entitled to request from us:**

- The personally identifiable information that we have collected from you, how it is used and with whom it may be shared.
- The choices that are available to you regarding the use of your data.

- The security procedures in place to protect the misuse of your information.
- How you can correct any inaccuracies in the information we hold.

### **changes to our privacy policy**

Any changes we may make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by email.

### **who is the main point of contact regarding the use and storage of data?**

If you have any questions about how we use your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

Telephone: 01323 312121

Email: [marketing@wishtower.com](mailto:marketing@wishtower.com)

Write to us:

*Privacy Administrator  
Wishtower  
23 Marshall Road  
Eastbourne  
East Sussex  
BN23 9AD*