



OREGA

OREGA PRIVACY POLICY



OREGA (MANAGEMENT) LIMITED

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1. Important information and who we are

Purpose of this Privacy Notice

This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights.

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.

Our role as Controller and Processor

In most cases Orega acts as a data controller in relation to the personal data we collect from our clients, their staff and visitors, because we decide how and why that data is processed in order to provide our services.

In some locations, Orega provides services under a management agreement with the building owner. In those cases, where we collect personal data only for the building owner's purposes (for example, occupier details needed to issue building access passes), Orega acts as a processor on behalf of the building owner, who is the controller.

In certain circumstances both Orega and the building owner may each act as independent controllers where we separately use the same personal data for our own legal or operational purposes (such as CCTV monitoring or fire evacuation lists)

If you would like more information about how responsibility for your personal data is allocated between Orega and the relevant building owner, please contact us at privacy@orega.com

Contact details

Our full details are:

Full name of legal entity: Orega (Management) Limited

Email address: privacy@orega.com

Postal address: 3rd Floor, 70 Gracechurch St, EC3V 0HR

Telephone number: 0800 840 5509

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.

Changes to the Privacy Notice and your duty to inform us of changes

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

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.

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.

2. The data we collect about you

Personal data, or personal information, means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may 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, title and company name. Where you are the principle customer contact we will also collect your date of birth and address, which may also include you supplying us with photo ID, copy passport information and a utility bill for AML/KYC purposes only.
- Contact Data includes billing address, email address and telephone numbers.
- CCTV Data includes video images captured by our CCTV cameras.
- Financial Data includes invoicing 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, 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 our website.
- Usage Data includes information about how you use our website and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Vehicle Data includes vehicle registration number and driver name

We may 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 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 may passively process more sensitive information, known as Special Categories of Personal Data, if the CCTV Data reveals an individual's ethnic or racial origin, or data concerning their health (for instance, if they have a visible disability). If there is a security incident, we may also process some criminal offence data. Where cameras are in use there will be signs in place to inform you of this.

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 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.

3. How is your Personal Data Collected?

We use different methods to collect personal information from and about you including through:

Direct interactions. You may give us your Identity Data, Contact Data, Financial Data, Marketing and Communications Data and Vehicle Data by filling in forms or by corresponding with us by post, phone, email, or otherwise visit our premises. This includes personal data you provide when you:

- register an account with us;
- enter into a contract with us in relation to services provided by us;
- subscribe to marketing communications from us;
- submit enquiries to us or otherwise contact us; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

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;
- advertising networks; and
- search information providers.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

Identity and Contact Data from data brokers or aggregators. We will only accept Identity and Contact Data in this way where we have checked that these third parties either have your consent to disclose your personal data to us for the purposes of contacting you to offer services in relation to which you have made enquiries with those third parties or are otherwise legally permitted or required to disclose your personal data to us. We will notify you when we receive your personal data from a data broker or aggregator to confirm with you that you consent to us processing your data for the purposes advised by that data processor or aggregator.

Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

CCTV Data through the use of CCTV cameras on our premises.

4. How We Use Your Personal Data

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

Performance of a contract with you: Where we need to perform the contract we are about to enter into or have entered into with you.

Legitimate interests: We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) 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).

Legal obligation: We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

Consent: We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to marketing communications.

We have set out below, in a table format, a description of all the ways we plan to use the various categories of 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.

Purpose/Use	Type of data	Legal basis
To address initial enquiries.	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Performance of a contract with you
To register you as new customer	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation
To provide services to you and your clients and visitors, including the provision of parking spaces (at applicable premises)	<ul style="list-style-type: none"> • Identity • Contact • Vehicle 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to administer access to and ensure correct use of our facilities)
To manage our relationship with you, including: <ul style="list-style-type: none"> • managing fees, payments and charges; • collecting and recovering money owed to us; • notifying you about changes to our terms or privacy policy; • sending relevant business updates and communications; and • dealing with your requests, complaints and queries. 	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to recover debts due to us) • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)

Purpose/Use	Type of data	Legal basis
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • 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 restructuring exercise) • Necessary to comply with a legal obligation
To protect our buildings and assets from damage, to protect the health and safety of employees and visitors to our premises and to prevent and detect crime or criminal activity.	<ul style="list-style-type: none"> • Identity • CCTV 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for the purposes of ensuring the security and safety of our premises) <p>Our basis for processing special category personal data is:</p> <ul style="list-style-type: none"> • that there is a substantial public interest in processing this information, for the purposes of detecting or preventing unlawful acts
To use data analytics to improve our website, user experience and website performance.	<ul style="list-style-type: none"> • Technical • Usage 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and offers to you about services that may be of interest to you.	<ul style="list-style-type: none"> • Identity • Contact • Usage • Transaction • Marketing and Communications 	<ul style="list-style-type: none"> • Consent (having obtained your prior consent to receiving direct marketing communications) • Necessary for our legitimate interests (to carry out direct marketing, develop our services and grow our business)

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 compatible purpose. If you wish to receive an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis for doing so. We may also process your personal data without your knowledge or consent where this is required or permitted by law.

5. Cookies and Similar Tracking Technology

For more information about the cookies we use and how to change your cookie preferences, please see <https://www.orega.com/cookies>

6. Disclosures of Your Personal Data

We may share your personal data where necessary with the parties set out below for the purposes set out at section 4 above.

Internal Third Parties such as other group companies.

External Third Parties such as:

- Third-party service providers who provide data processing services to us. We engage a limited number of trusted third-party service providers ("subprocessors") to support the delivery of our services. These subprocessors only process personal data on our instructions and in accordance with our privacy and security requirements. A current list of our subprocessors is maintained and can be accessed at www.orega.com/subprocessors or requested by contacting us at privacy@orega.com.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who may require reporting of processing activities in certain circumstances.
- To an actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice.
- Landlords in relation to premises where we provide services. We are required to notify the landlords of each building when a new tenant takes occupation and this may involve disclosure of your personal data if you are the tenant. We may also share health and safety information, such as visitor logs, in the event of an incident.
- Third parties such as data brokers where our lease for premises is to expire and we consider that the broker may be able to provide assistance to you in relation to you finding alternative accommodation.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets or who take over any of our rights or obligations under a contract that we have with you. This will include where we have entered into a contract with you in relation to premises where our lease in relation to those premises expires and a third party takes over the lease and our liabilities under our contract with you. 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.
- Law enforcement agencies or regulators, or other third parties in order to comply with a court order.
- 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.

7. International Transfers

We do not generally transfer your personal data outside the UK. If such transfers occur (e.g. to subprocessors based outside of the UK), we ensure that a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; or
- We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement or the International Data Transfer Addendum to the European Commission's Standard Contractual Clauses for international data transfers.

8. 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.

9. 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. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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.

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.

10. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

- **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 do not withdraw your consent nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than 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.

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.