

GHH (POC) Limited business incubator and flexible workspaces privacy notice

The data controller for the purposes of the Data Protection Act and the General Data Protection Regulation is GHH (POC) Limited of 70 Grosvenor Street, London, W1K 3JP.

GHH (POC) Limited strongly believes in protecting your privacy and the confidentiality of your personal information. To explain how GHH (POC) Limited collects, uses and protects personal information in we have developed the following privacy notice. In this privacy notice, 'We' and 'Us' means GHH (POC) Limited.

1 Contact details

You can contact us with any questions you may have about privacy and/or data protection. Our contact details are: hello@grosvenorhart.com

2 About this privacy notice

We explain in detail below the types of information that we collect, how and why we use that information, and what rights you have in connection with your personal information.

3 What personal information do we collect about you and how do we collect it?

We may require you to provide certain personal information to us where it is necessary. If you fail to provide certain information when requested, we may not be able to offer you a specific service or perform the contract with you.

We may collect and use the following information about you:

- Contact information, such as your full name, postal address, email address and telephone number(s)
- Identification documents (driving license or birth certificate for example)
- Information about your employment
- Information to show that you have the right to work and/or reside in the UK
- Financial information, such as your bank account details, unique tax reference number
- Insurance certificates

4 Personal information we collect about you from other sources

We may collect personal information about you from other sources. This may include the following:

- From Cheshire West and Chester Council, because of any reporting purposes to do with funding.
- References and/or referrals from organisations giving information on education and/or employment status, for example educational establishments and the Department of Work and Pensions
- Publicly available information, from sources such as Companies House, the Electoral Roll, County Court Judgments, decrees for payment, and repossessions this may include details about your home, household, vehicles, financial situation, and debts
- Information from third party databases or data suppliers, such as commercial property sites, auction sites and credit reference agencies, including details about your home, belongings, and creditworthiness

This list is not exhaustive, and, in specific instances, we may need to collect additional personal information for the purposes set out in this notice.

5 How do we use your personal information?

5.1 Main purpose for using your personal information

We may use your personal information for the following purposes:

- So that we can verify who you are and your eligibility for the service we are delivering
- So that we can determine the best support and/or services suitable to your needs and requirements
- To enable us to track and report on service performance outcomes, including to third parties who may require this information for funded programmes
- To gain feedback from you so that we can evaluate and improve our services
- To minimise risks and liabilities to GHH (POC) Limited

So that we can contact you when needed, e.g., to confirm a booking, in case of emergencies, or to let you know about our services that are available to you

5.2 For access and security purposes

- If you become a customer, then we will require your email address, to enable you download the access control app, for you to be able to access the building
- CCTV is in operation for safety and crime reduction purposes

5.3 Sensitive personal information

Sensitive Personal information, such as ethnicity, religion, sexual orientation, and physical and mental health requires higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal information. We may process this personal information in the following circumstances:

- With your explicit written consent
- Where we need to carry out our legal obligations and in line with this privacy notice
- Where it is needed to assess any special requirements you may have due to any disabilities or health issues you may have, subject to appropriate confidentiality safeguards

Less commonly, we may process this type of personal information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the personal information public.

5.4 Telling you about events and activities that we think may be of interest to you

We may use your personal information to identify and tell you about events and activities that we think may be of interest to you. We will only do this by email where you have informed us that you would like to receive these communications via email. Whether you choose to receive this information via email is entirely up to you. You can update your preferences by responding to our emails to you, or by contacting us (see contact details above).

We may also use your information to invite you to participate in market-research. If we do contact you about market-research, you do not have to participate. If you tell us that you do not want to receive market-research communications, we will respect this.

5.5 Change of purpose

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6 Legal basis to use your personal information

We take data protection law seriously. The principal legal bases on which we use your personal information are as: (a) to allow us to enter and perform a contract, (b) to enable us to comply with legal obligations, and (c) in order to pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests).

7 Who do we share your personal information with?

7.1 Sharing your personal information internally

We may share your personal information with our employees where this is necessary, such as for internal administration purposes. Your personal information will only be shared with such employees as are reasonably necessary for these purposes.

7.2 Sharing your personal information with third parties

We may share your personal information with Cheshire West and Chester Council, because of any funding requirements.

We may need to share your personal information with certain third parties, including third-party service providers, and we require third parties to respect the security of your personal information and to treat it in accordance with the law.

There are also certain exceptional circumstances in which we may disclose your personal information to third parties. This would be where we believe that the disclosure is:

- Required by the law, or to comply with judicial proceedings, court orders or legal or regulatory proceedings
- Required due to the collection of debt and/or and tracing agencies
- Necessary to protect the safety of our employees, our property, or the public
- Necessary for the prevention or detection of crime, including exchanging personal information with other companies or organisations for the purposes of fraud protection and credit risk reduction

8 How long do we keep your personal information?

8.1 Application not progressed

If you decide you no longer want to progress your application, then we will not retain your personal information.

8.2 Application progressed

All other personal information will only be kept for up to 10 financial years after the end of your contract with us.

8.3 Access control purposes

If you become a customer, then your personal information will only be kept for access control purposes, for as long as you are a customer.

8.4 CCTV images

This is kept for 30 days, unless required for evidential purposes.

9 How do we protect your personal information?

We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this notice.

All personal information you provide to us is stored securely, including in a physically secure environment, on our secure servers.

Access to your personal information will be restricted to such employees and other individuals as are necessary for the purposes for which the information was collected.

10 What rights do you have in respect of your personal information?

10.1 You have the right to be informed

We have a legal obligation to provide you with concise, transparent, intelligible, and easily accessible information about your personal information and our use of it. We have written this notice to do just that, but if you have any questions or require more specific personal information, you can contact us (see contact details above).

10.2 You have the right to access your personal information

You have the right to ask us to confirm whether or not we hold any of your personal information. If we do, you have the right to have a copy of your information and to be informed of the following:

- Why we have been using your personal information
- What categories of personal information we were using
- Who we have shared your personal information with
- How long we envisage holding your personal information

To maintain the security of your personal information, we will have to verify your identity before we provide you with a copy of the information we hold.

10.3 You have the right to correct any inaccurate or incomplete personal information

You have the right to amend any inaccurate personal information about you which we hold. If you need any support, please contact us (see contact details above).

10.4 You have the right to be forgotten

There may be times where it is no longer necessary for us to hold personal information about you. This only relates to the following:

- The personal information is no longer needed for the original purpose that we collected it for
- You withdraw your consent for us to use the personal information (and we do not have another lawful reason to use it)
- You object to us using your personal information and we have no overriding reason to keep using it
- We have used your personal information unlawfully
- We are subject to a legal requirement to delete your personal information

In those situations, you have the right to have your personal information deleted. If you believe one of these situations applies to you, please contact us (see contact details above).

10.5 You have the right to have a copy of your personal information transferred to you or a third party in a compatible format

Also known as Data Portability, you have the right to obtain a copy of your personal information for your own purposes. This right allows you to move, copy or transfer your personal information more easily from one IT system to another, in a safe and secure way. This right shall only apply where:

- we are processing your personal information for the purposes of entering or performing a contract; or
- you have provided consent for us to process your information

If you would like us to transfer a copy of your personal information to you or another organisation in a structured, commonly used, and machine-readable format, please contact us (see contact details above).

10.6 You have the right to object to receiving emails from us about events and activities

You can tell us at any time that you would prefer that we do not use your email address to be contacted about events and activities. If you would like to stop receiving emails about events and activities please contact us (see contact details above) or respond to the emails that we send, and we will stop sending these immediately.

10.7 You have the right to object to us using your personal information for our own legitimate interests

Sometimes, we use your personal information to pursue our own legitimate interests, or those of third parties (please see 'How do we use your personal information?' above for more information about such interests).

We aim to always ensure that your rights and personal information are properly protected. If you believe that the way we are using your personal information is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal information for these purposes.

To exercise your right to object to our use of your personal information for the purposes above, please contact us (see contact details above).

10.8 You have the right to restrict how we use your personal information

You have the right to ask us to stop using your personal information in any way other than simply keeping a copy of it. This right is available where:

- You have informed us that the personal information we hold about you is inaccurate, and we have not yet been able to verify this
- You have objected to us using your personal information for our own legitimate interests and we are in the process of considering your objection
- We have used your personal information in an unlawful way, but you do not want us to delete your personal information
- We no longer need to use the personal information, but you need it for a legal claim

If you believe any of these situations apply, please contact us (see contact details above).

11 Complaints

If you wish to make a complaint about our collection or use of your personal information, please contact us in the first instance so that we may seek to resolve your complaint.

If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the statutory body which oversees data protection law in the UK. This is the link to the [ICO website](#) if you wish to lodge a complaint with the ICO.