



HANGER HILL GARDEN ESTATE RESIDENTS ASSOCIATION



DATA PRIVACY NOTICE

Hanger Hill Garden Estate Residents Association (HHGERA, or the Association) acts on behalf of everyone who lives on the Hanger Hill Garden Estate (the Estate) - whether in houses or flats - as our official representative in the local community with Ealing Council and other organisations. Within HHGERA, a Houses Committee acts as the managing agent for Hanger Hill Garden Estate Residents Ltd, the company which owns the Houses communal gardens and service roads. HHGERA is committed to protecting your information and acting in accordance with your rights under data protection law.

This privacy notice contains information on:

- what personal information we collect about you;
- what we do with this information;
- the legal basis for using your personal information; and
- your rights.

Collecting your information

If you are a resident or the owner of property on the Estate, we may collect, store and process the following information about you:

- your personal details which can include your name, address (including postcode), telephone numbers, e-mail address, and country of residence;
- information relating to your property (e.g. planning applications, Deed of Easement, managing agent where let), financial standing with HHGERA (e.g., as relevant, payment of the Houses annual service charge and contribution to service road repairs), and holding of keys to service road gates;
- records of attendance at HHGERA Annual General Meetings and involvement in HHGERA activities;
- records of communications with you; and
- any other information the Association deems necessary to carry out its responsibilities, as set out in the Rules of the Association (available on the Association's website hhgera.com).

We will not collect, store or process sensitive personal information about you, i.e. information concerning areas such as your religion, state of health or sexuality.

**Hanger Hill Garden Estate Residents Association is the Managing Agents for
Hanger Hill Garden Estate Residents Ltd
Company No: 01757836. Registered Office: 43 Monks Drive, London W3 OEB**

How we use your personal information

We may use your personal information for the following purposes:

- to communicate with you about your property, financial standing with HHGERA and keys to service road gates;
- to administer the Association, which may mean maintaining lists of residents, property owners and their contact details;
- to collect and manage the Houses annual service charge and ensure prudent financial management of the Association;
- to support the security of residents through maintenance of a register of key holders to the Houses service roads for which HHGERA is responsible;
- to support community building and the enjoyment of the Estate by all who live here (e.g. by organising events, mediating in case of disputes between neighbours, or combatting antisocial behaviour);
- to maintain the amenities of the Conservation Area covering the Estate for everyone who lives here;
- to liaise with residents and owners of property on the Estate about matters the Association judges may affect their interests (e.g. maintenance of land owned by the Association);
- to maintain liaison between HHGERA's Houses Committee and the management company for the blocks of flats on the Estate; or
- to meet any other legal and regulatory responsibilities, for example disclosures to the local authority, Police and other government agencies.

Data protection law (notably the Data Protection Act 2018 and EU General Data Protection Regulation) allows us to use your personal information as described above because it is necessary for HHGERA's legitimate interests in pursuing its responsibilities, such interests not being overridden by your privacy interests.

Sharing your personal information

We may share your personal information with the following:

- Association members and officers, for the purpose of collecting annual service charge and other financial contributions to the running of the Estate;
- our suppliers and other providers of services who use the information on our instructions, for example to produce mailings and service charge invoices or to maintain the register of key holders for service roads on the Estate;
- our solicitors (currently Muscatt Walker Hayim), e.g. to issue Deeds of Easement for houses on the Estate;
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and

- other persons from time to time when the disclosure is needed to exercise or protect our legal rights, including the rights of other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others. This may include the police or by order of the court if, for example, there is suspected or actual criminal activity on the Estate.

When we share your personal information with our suppliers and service providers, we take steps to ensure they meet our data security standards, so that your personal data remains secure.

We will not share your personal information with outside bodies other than where it is necessary to carry out HHGERA's responsibilities. In particular, we will not share property owners or residents' details for commercial purposes such as the creation of mailing lists for businesses.

Keeping your personal information

We will make every endeavour to keep your information safe, for instance by password-protecting databases and lists used to generate the Houses service charge invoices and by storing information wherever possible on secure shared drives such as Dropbox.

We will keep your personal information only for as long as required in order to meet our responsibilities under the Association's Rules referred to above, and to meet our legal or regulatory responsibilities.

Your rights

You have rights under data protection law to access and correct your personal information and (in some circumstances) to restrict its use or have it deleted.

In some circumstances, you also have the right to object to the processing of your personal information and to require certain personal data to be transferred to you or a named third party.

You can exercise any of these rights by contacting us at the address set out below.

You can also lodge a complaint about our processing of your personal information with the office of the Information Commissioner, contact details for which are available at www.ico.org.uk.

Status of this privacy notice

This privacy notice was last updated on 24 May 2018.

This document is a notice to you and not a contract between us. It may be subject to amendments from time to time.

Any future changes or additions to our processing of personal data (as described in this privacy notice) which affect you, will be brought to your attention in a way which is appropriate, having regard to the way in which we normally communicate with you.

Contact information

You can contact us about the matters set out above via the Contact Form on the Association's website (<http://www.hhgera.com/#!/contact-form>) or by emailing mail@hhgera.com.