



Charter Court
Financial Services

CCTV, Supplier & Visitors Privacy Notice

2018 Edition

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About us

Charter Court Financial Services Limited is part of the Charter Court Group. The Charter Court Group is made up of Charter Court Financial Services Group plc and its subsidiary companies Charter Court Financial Services Limited, Charter Mortgages Limited, Exact Mortgage Experts Limited and Broadlands Finance Limited. Charter Court Financial Services Limited trades under the name of Precise Mortgages, Charter Savings Bank and Exact Mortgage Experts.

Charter Court Financial Services Limited will be a data controller of any personal data it holds about you. We may share this information with other parts of the Charter Court Group. Where this occurs, they will be a separate data controller in respect of that personal data, and this privacy notice will also apply to any processing they undertake, unless they provide you with an alternative privacy notice.

A Data Controller is an individual or organisation which decides how your personal data will be used. The Data Controller is referred to as "we", "us" and "our" in this privacy notice.

If you require any further information or wish to contact us or our Data Protection Officer at any time our contact details are:

Address:	Charter Court Financial Services Limited 2 Charter Court Broadlands Wolverhampton WV10 6TD
Telephone Number:	0333 014 3477
Website:	www.chartercourtfss.co.uk
DPO Email:	thedataprotectionofficer@chartercourtfss.co.uk

Who this privacy notice applies to

This privacy notice explains how we will use the personal data of:

- our suppliers and potential suppliers owners, directors, company secretary and senior management;
- visitors, including external contractors, to our premises, and
- persons captured on CCTV

each such person is referred to as "you" and "your" in this privacy notice.

Why we are providing you with this privacy notice

Applicable Data Protection laws (including the General Data Protection Regulation 2016 and the Data Protection Act 2018) impose obligations on us as the data controller, when we collect or create, hold, amend, disclose, share or otherwise use or erase/destroy (collectively referred to as processing) your personal data and give you, as the data subject, rights over your personal data.

One such obligation is to process, (e.g. collect, hold, use or erase) your personal data, fairly, lawfully and in a transparent manner. This privacy notice meets that obligation by explaining what personal data we will hold about you, how we will process your personal data, why we process your personal data and the lawful grounds on which we are processing it. It also sets out some of your legal rights.

We may change this privacy notice in the future and we will always ensure that the latest version is available to you.

How we obtain your personal data

The data we hold about you will be provided by or obtained from you, your employer, the person(s) you visit when you visit our premises, persons working on our behalf or providing services to us, other companies within the Charter Court Group or are images captured on CCTV. We may also obtain data about you that is publicly available such as from the Electoral Register, the Internet, Companies House and the Land Registry

The types of personal data we have about you

We may process a variety of data about you, where necessary, for the purposes set out in the "How We Will Use Your Data" section, including data about:

You as an individual

- name and title
- address and email address
- the company you work for
- car registration number
- the details of any accidents you have on our premises
- your image including your image captured on internal and external CCTV
- time and date of entry to and departure from our premises

and if you are a supplier of services or employed by a supplier to us :

- date and place of birth
- background checks carried out by your employer

How we will use your data

We will use your personal data to:

enable you to visit us and use our car park

This will include to:

- authorise, grant, administer, monitor and terminate access to our premises and car park
- record, monitor and report accidents
- ensure that our suppliers and their employees meet the standards we expect for suppliers working on our sites

monitor our premises and surrounding areas

This will include to:

- assist in the prevention or detection of crime or equivalent malpractice
- assist in the identification and prosecution of offenders
- monitor the security of our business premises
- ensure that health and safety rules and company procedures are being complied with
- assist with the identification of unauthorised actions or unsafe working practices
- promote productivity and efficiency

manage our relationship with our suppliers and potential suppliers	<p>This will include, where you are a supplier of services or employed by a supplier to us, to:</p> <ul style="list-style-type: none"> • undertake due diligence on our suppliers or potential suppliers, their directors, company secretary and senior management • administering the contracts we have with our suppliers • provide our suppliers with information about your attendance at our premises and performance of the contract • contact you • to deal with complaints and disputes that may arise
identify, prevent and investigate financial crime	<p>This will include to:</p> <ul style="list-style-type: none"> • detect, prevent, investigate and/or report suspected money laundering, fraud, bribery, corruption and other crime • identify and prosecute offenders • identify a victim or witness
comply with our legal, contractual and regulatory obligations, codes of practice and to run our business	<p>this will include to:</p> <ul style="list-style-type: none"> • provide data, reports and returns when required by a court order or other legal or contractual obligation • manage, monitor, analyse, develop, forecast and report on the performance of our businesses, suppliers and other third parties • manage risk for us our, customers, clients and suppliers • seek advice from our advisers • comply with any other legal obligation imposed on us, including where you have sought to exercise your legal rights
investigate and respond to complaints, disputes and where necessary to bring or defend legal claims	<p>this will include to:</p> <ul style="list-style-type: none"> • identify and document facts and evidence • investigate and respond to complaints, disputes, regulatory investigations and/or to bring or defend legal claims • allow us to ensure that we offer the highest standard of customer service, by identifying if we have provided any inadequate service and the causes of such failings, and to determine how to avoid any repeat of that situation and improving our services

The legal grounds on which we will process your data

We will only process your personal data if we have a reason to do so that is legally permitted. When using your personal data for the purposes listed above we are relying on one or more of the following legal reasons for processing that data:

- the purpose is necessary for the performance of a contract with you or, if you asked us to, to enable us to enter into a contract with you;
- the purpose is necessary for us to comply with our legal obligations, or
- the purpose is necessary for our legitimate interests

The legitimate interests we have for processing your personal data as described above include to:

- comply with our legal and contractual obligations, best practice and codes of practice;
- exercise our legal rights;
- prevent financial and other crime;
- meet expectations of us;
- verify the information provided to us to ensure its accuracy;
- develop and improve our business;
- undertake analysis, modelling and forecasting;
- manage and mitigate the risks to you and our business;
- be efficient in running our business, providing our products and services, fulfilling our legal obligations and meeting expectations of us;
- ensure our business is profitable and has adequate levels of capital and funding, or
- facilitate investment in, and the growth of, our business

Who we share your data with

We will also share your personal data with other companies within the Charter Court Group and with

- your employer;
- your representatives and advisers;
- any other person you ask us to provide information to;
- your and our insurers;
- our advisers including lawyers, accountants and auditors;
- statutory and regulatory bodies including Tax Authorities, HMRC, Benefits Agency, Information Commissioners Office, Prudential Regulation Authority, Financial Conduct Authority and Health and Safety Executive;
- central and local government;
- the courts and any arbitrator or adjudicator of a dispute involving us;
- law enforcement agencies, or
- agents and suppliers who act or may act on our behalf.

How long we will hold your data for

How long we will keep the data for will depend on how the data is collected and what the data relates to. We will normally keep it for the longer of the following periods.

Data collected	How long we will normally keep data for
Visitors Book	3 months
CCTV	17 days
Accident Book	3 years
Suppliers or Employees of suppliers	for 7 years from the end of the contract with the suppliers
Electronic access records	Indefinitely

We may retain the data for longer where it is necessary for us to do so because:

- it is or may be subject to or form part of a complaint, dispute or investigation;
- to meet our legal or regulatory obligations, or
- for research or statistical purposes or technical reasons.

If you choose not to give us personal data

If you do not provide the information requested we may not give you access to our premises or it may affect how we are able to manage our relationship with our suppliers or potential suppliers.

Your legal rights

You have a number of rights over your personal data processed by us. These include your rights to request:

- [access to your personal data](#). You may request a copy of the personal data that we hold about you.
- [accuracy of your personal data](#). You may request that we correct incomplete, inaccurate or outdated personal data. We take sensible steps to make sure that personal data is accurate, complete, and current. You can help us do this by notifying us of any changes to your personal data.
- [transmission of personal data](#). You may request that we transfer personal data you have provided to us to you or to another person.
- [erasure of personal data](#). You may request that we delete your personal data.
- [that the processing of your personal data be restricted](#). You may request that our use of your personal data ends, is restricted or limited.

The extent of these rights are limited by law and we may not act on part or all of your request(s) where the rights are not applicable. If we do not act on your request we will explain our reasons for not doing so when responding to your request.

If you require any further information about how we handle your personal data or wish to make a request to exercise any of your rights under applicable Data Protection laws, please contact our Data Protection Officer.

Sending your personal data outside the European Economic Area

Your personal data may be processed or transferred outside the United Kingdom and the European Economic Area. If you require further information as to where your personal data is transferred to, and the measures we have implemented to safeguard that information, please contact our Data Protection Officer.

How to complain

If you are unhappy with the outcome of any of your requests to exercise your rights, or how we handle your personal data then please let us know.

You are also entitled to complain with the Information Commissioner's Office:

Address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone Number: 0303 123 1113

Email: Casework@ico.org.uk