



SIR RICHARD SUTTON  
LIMITED

## Privacy Policy

### 1. Introduction

1.1. This Privacy Notice (Notice) explains how Sir Richard Sutton Limited (we, our, us) collects, uses and discloses your personal data, and your rights in relation to the personal data it holds.

1.2. We may change this Notice from time to time. However, any major changes will be notified directly to those affected wherever practicable. This Notice is effective from May 2018, when it was last updated.

### 2. Data controller

Sir Richard Sutton Limited (a registered company in England (company no. 00346359) with its registered office at Regent House, 41 Great Pulteney Street, London, W1F 9NZ) is the data controller of your personal data and is subject to the Data Protection Act 1998 (DPA) and any related or successor legislation, including the Privacy and Electronic Communications Regulations 2003 and, from 25 May 2018, to EU Regulation 2016/679 (the GDPR) and the UK Data Protection Act 2018.

### 3. How we collect your data

3.1. We may collect your personal data in a number of ways, for example:

3.1.1. From the information you provide to us when you meet with one of our employees or representatives;

3.1.2. When you communicate with us by post, telephone, fax, email or other forms of electronic communication;

3.1.3. When you book or make arrangements to attend one of our events (for example, a sporting or hospitality event on one of our estates);

3.1.4. When you enter into a tenancy agreement in relation to one of our residential or commercial properties. This information may be passed to us by one of our managing agents who manage the properties on our behalf;

3.1.5. If a third party provides information to about your activities in connection to one of our properties (for example if a complaint is made against you);

3.1.6. When we receive information from a third party suggesting that you may be interested in attending one of our events;

3.1.7. When you make a payment in relation to attending one of our events or when paying an invoice in connection to our properties; and

3.1.8. When you or your employer enters into a business contract with us and your personal data is exchanged as part of entering the contract or in the performance of that contract.

REGENT HOUSE | 41 GREAT PULTENEY STREET | LONDON | W1F 9NZ  
T. 020 7493 0545 | E. INFO@SRSL.CO.UK | WWW.SRSL.CO.UK  
REGISTERED NO. 346359 ENGLAND

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**4. The categories of the data we collect**

4.1. We may collect the following categories of personal data about you:

- 4.1.1. Your name, job title, qualifications, and contact information such as address, email address and telephone number;
- 4.1.2. Information about allergies (provided by you in connection to catering services provided by us or a third party);
- 4.1.3. Driving or firearm licence information where this is required for an event that you are attending;
- 4.1.4. Financial information including bank account numbers and sort codes which may be provided to us when you make a payment;
- 4.1.5. Information concerning your engagement with us, including records of communications between you and us and your attendance at our events;
- 4.1.6. Information on the condition of one of our properties that may be related to how you have treated the property;
- 4.1.7. Information about you, your previous property history and credit check which may be passed to us by a managing agent of one of our properties who has carried out background checks on our behalf; and
- 4.1.8. Your opinion and feedback in relation to any surveys or questionnaires that you complete, such as feedback on our events.

**5. The legal basis for processing your data, how we use that data and with whom we share it**

*Where we have a contractual relationship with you*

5.1. We may process your personal data because it is necessary for the performance of a contract to deliver the services you have engaged us for, or in order to take steps at your request prior to entering into a contract. This will include where you are attending one of our events or are a tenant of one of our properties. In this respect, we use your personal data for the following:

- 5.1.1. To correspond with you about services that you have requested from us, including providing details of our events; and
- 5.1.2. To maintain internal records and to perform administrative services in connection to your tenancy.

5.2. In this respect, we may also provide your personal data to the following (but only for purposes connected with our fulfilling contracts with you):

- 5.2.1. Third party service providers who we may engage to assist in delivering the services to you: for example, managing agents, maintenance contractors, caterers, gamekeepers and beaters;
- 5.2.2. Our bank to whom payment details are provided in order to process a payment;
- 5.2.3. Our professional advisers where it is necessary for us to obtain their advice or assistance; and
- 5.2.4. Our IT support and any data storage provider.



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*Legal obligations and legitimate interests*

5.3. We may process your personal data because it is necessary for our or a third party's legitimate interests. This will always be weighed against your rights, interests and expectations.

5.4. Examples of where we process personal data in accordance with our legitimate interests include:

5.4.1. processing enquiries, complaints and analysing our services;

5.4.2. researching our market; and

5.4.3. marketing our goods, services, events and resources by post, telephone and electronic mail – except in situations where it is required or appropriate to seek your specific consent.

5.5. We may also process your data for our compliance with our legal obligations. In this respect we may use your personal data to comply with subject access requests of others, tax legislation, for the prevention and detection of crime, and in order to assist the police and other competent authorities with investigations (including criminal investigations).

*Consent*

5.6. In some circumstances we may seek your specific consent to process your personal data: for example, if we wish to use your likeness or an attributed quote in our marketing materials, or if we wish to process medical information such as information about allergies you have so that we can provide catering services to you.

5.7. We may also request your consent to process your personal data to provide you with information of a marketing nature to your personal email account, if you have provided your email address for those purposes.

5.8. If you have given your consent and you wish to withdraw it, please contact us using the contact details at section 8.4. Please note that where our processing of your personal data relies on your consent and you then withdraw that consent, we may not be able to provide some aspects of our services to you. Equally, where our processing of your personal data does not on your consent, we may not be able to fulfil your request (please see Your Rights section below).

**6. Profiling**

6.1. We may use personal characteristics such as age, gender, address, role, your expressed interests, your previous interactions with us or geographical location to target our communications and advertising and promotions to a specific audience. If you wish to tailor the communications you receive from us then please contact us using the details provided at section 8.4.



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## 7. Retention of your data

7.1. We may retain your personal data only for so long as is necessary to deliver our services to you, and to protect our legal interests (for example where required by relevant authorities, or for a reasonable legal limitation period after we have ceased providing services to you) or as otherwise stated to you when your data is collected. If you have any query about retention of your data, please see Your Rights below.

## 8. Your rights

8.1. You have the following rights:

8.1.1. To require us not to send you marketing communications.

8.1.2. To obtain access to, and copies of, the personal data that we hold about you;

8.1.3. To request that we erase your personal data;

8.1.4. To request that we restrict our data processing activities;

8.1.5. To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and

8.1.6. To require us to correct the personal data we hold about you if it is inaccurate.

8.2. Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply: for example, if we have reason to believe the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this notice.

8.3. You can find out more about your rights under data protection legislation at [www.ico.org.uk](http://www.ico.org.uk).

8.4. If you have any questions about how we use your personal data, or you wish to exercise any of the rights set out above, please contact us below by using the following details:

8.4.1. By post – Sir Richard Sutton Limited, Regent House, 41 Great Pulteney Street, London, W1F 9NZ.

8.4.2. By email – [nick@srsr.co.uk](mailto:nick@srsr.co.uk)

8.4.3. By telephone – 020 7493 0545

8.5. If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner ([www.ico.org.uk](http://www.ico.org.uk)).

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