

Canary Wharf Group

General Privacy Notice

1. Introduction

Canary Wharf Group plc and all associated group companies (“Canary Wharf Group”) of One Canada Square, Canary Wharf, London, E14 5AB, respects the privacy of individuals. We want you to understand how we protect and safeguard your data privacy rights and comply with our obligations concerning your personal data.

Employees and contractors working for Canary Wharf Group should also refer to our *privacy notice for employees and contractors*.

This notice outlines how we collect and use your personal information, for example when you:

- visit **www.canarywharf.com** or any of Canary Wharf Group’s other website on which this privacy notice is posted.
- register for information or when you communicate with us in another way, such as by phone, mail or email or when you visit Canary Wharf in person.
- utilise our services such as the Canary Wharf visitors or residents Apps or make customer enquiries.
- apply for jobs at Canary Wharf Group. If you are applying for a vacancy, please also view our *Privacy Notice for Candidates*.
- are assisted by or otherwise come to the attention of security personnel, for example if you have been involved in an accident, or you have been challenged about your activities on the Canary Wharf estate.

We wish to help you make informed decisions, so please take a few moments to read the sections below and learn how we may use your personal information.

2. What personal information may we collect about you?

Most of the information we collect about you is obtained directly from you when you enter it via a website or write to us. However, we may also collect information about you from public sources or that which we observe, for example via cookies when you visit one of our websites.

Below we list some of the most common categories of personal information we may collect about you.

- Your contact details (including, name, date of birth, title, postal addresses, telephone numbers and email addresses) to keep in touch with you and/or contract with you.
- Your image where you choose to upload or share this, for example if you link an image containing personal data to an account profile. This may be removed or changed at your discretion, but you are responsible for and should obtain permission for any content you upload which should comply with relevant terms and conditions of use.
- Your age, gender, employment history, work experience, aspirations, leisure and interests that you may provide us when enquiring about or applying for a job at Canary Wharf Group.

- Professional relationship information such as business contact information, including your industry, job title or role, your primary Canary Wharf Group contacts and record of interactions with us, as well as other information you may provide to us concerning a business relationship.
- Financial information from an individual and/or supplier in order to fulfil contractual obligations or with a view to entering into a contract with you. This can include your payment and bank details.
- Any personal information you choose to give us when contacting Canary Wharf Group
- Sensitive personal information relating to your health, race or ethnicity, for monitoring equal opportunities and/or to provide you with the necessary support when attending Canary Wharf Group sites and/or events taking place outside Canary Wharf Group sites.
- Audio, video recordings, live stream footage and/or videography or other image(s), if your consent has been given, in connection with Canary Wharf Group's business purposes, for advertising promotion and other commercial purposes.
- Other operational personal data created, obtained, or otherwise processed in the course of carrying out our business activities, including but not limited to, CCTV footage, information gathered via cookies regarding your use of any of Canary Wharf Group's websites, recordings of telephone conversations, logs of visitors, and logs of accidents, injuries and insurance claims.

3. How do we use your personal information?

Your relationship with us will determine why we collect and process information about you and the lawful basis on which we rely when doing so. We may be required by law to collect certain information to need information to perform or conclude a contract. We may rely on our legitimate business interests to process your personal data where this is permitted and does not override your rights or interests.

We may collect and use your information to:

- Effectively respond to and deal with your query in the event that you contact us.
- Supply you with goods and/or services that you have requested.
- Process your application form in the event you have applied for any Canary Wharf Group vacancies.
- Ensure you see relevant and interesting content on our website(s) using your electronic information (cookies) in line with our website terms and conditions.
- Report and manage information for budgeting and forecasting.
- Process information that is required or requested by regulatory bodies or law enforcement agencies.
- Investigate, respond to and/or process any complaints, claims for loss, damage and/or injury.
- Prevent and/or detect crime or anti-social behaviour.
- Prevent or detect trespass or access or attempted access to unauthorised areas throughout the Canary Wharf estate.
- Monitor the safety and security of our employees and visitors.
- Facilitate your access to our on-site facilities.
- Obtain your views on Canary Wharf Group's services, development projects or planning proposals.
- Notify you of any events we hold which we think may be of interest to you.
- Aggregate/process personal data for research, statistical and/or scientific purposes
- Processing audio, video recordings, live stream footage and/or videography or other image(s) to enhance your user experience when using our services or for profile identification, advertising, marketing and/or promotional purposes, where you have given your consent.
- Communicate marketing or other information where you have given your consent.

4. Who has access to your personal information?

Your information will be processed by employees of Canary Wharf Group in order to fulfil our obligations to you as outlined in this notice and any content you publicly share via your profile when using the Canary Wharf App will be shared with other App users. We may also share your details with third parties including:

- Contractors working on behalf of or in partnership with Canary Wharf Group.
- Our third-party suppliers/service providers who perform functions on our behalf under contract to support our systems, operations and/or processes.
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this information.
- Law enforcement, local authorities and other organisations who can legally request access to information about you for prevention and detection of crime, the apprehension or prosecution of offenders, and the assessment or collection of tax.
- Businesses across the Canary Wharf estate where we have a legitimate interest or other lawful basis to share your data, for example, to prevent or detect unlawful acts or protect the public against dishonesty.

5. The Canary Wharf Business Crime Reduction Partnership

If you are suspected of committing an offence or anti-social behaviour anywhere on the Canary Wharf estate, your personal data may be processed under the Canary Wharf Business Crime Reduction Partnership (BCRP) scheme. Under BCRP schemes local businesses, the police and local authorities share information with a view to preventing, detecting and reducing crime and anti-social behaviour. The *Canary Wharf BCRP privacy notice* explains the processing of data under the scheme in more detail. This is available on our website and the websites of other scheme members

6. Information security and International Transfers

Canary Wharf Group is committed to being transparent and taking all reasonable and appropriate steps to keep your personal information secure and to protect it from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures.

At Canary Wharf Group we have a strict selection process when it comes to our suppliers/service providers and our contract terms with third parties ensure your personal information is stored and transferred in a way which is secure.

In the event any of your personal information is required to be transferred to service providers outside the UK and the European Economic Area (EEA)*, we will take all reasonable steps to ensure that your personal data is processed securely. We will only agree to the transfer of personal information outside the UK and EEA where this is compliant with applicable data protection legislation and where the means of transfer provides adequate safeguards in relation to your personal information.

*The currently comprises the Member states of the European Union plus Norway, Iceland and Liechtenstein.

If you use any of our services that are provided by or supported by third parties, such as the Canary Wharf visitor or resident apps, please ensure you refer the privacy notice(s) published by those third parties to understand how your data is used and shared when doing so and to any related terms and conditions of use.

7. How long will you keep my personal information?

Information is only kept as long as necessary for the period it is required. When deciding how long we keep your information we take into account any minimum retention requirements set out in law; for example, financial and statutory reporting requirements mean we must keep certain records for a period of 7 years. Depending on the purpose for which we hold your personal data, retention periods may vary and some data may be stored for longer than the stated retention period for the purposes of business continuity. CCTV footage is held securely for 28 days (unless there are grounds for preserving it) and data relating to visitor passes is held for 39 months following pass card or QR code deactivation. Please contact dataprotection@canarywharf.com if you require further information.

8. Changes to this notice

Just as our business changes constantly, this notice may also change. To assist you, an effective date set out at the end of this notice.

9. What rights do I have with regards to my personal data?

To exercise your privacy rights, please send your request in writing. We may be required to verify your identity for security purposes. Your rights are outlined below:

- The right to access information we hold about you, why we have that information, who has access to the information and where we obtained the information from.
- The right to correct and update the information we hold about you. If the data we hold about you is out of date, incomplete or incorrect you can inform us and your data will be updated.
- The right to have your information erased. If you feel we should no longer be using your data you can request that we erase the data that we hold. Upon receiving a request for erasure, we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest)
- The right to object to processing of your data. You may request that we stop processing information about you. Upon receiving your request, we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or bring or defend legal claims.
- The right to data portability. You have the right to request that we transfer your data to another controller.
- The right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data: (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.
- The right to withdraw consent at any time where we are relying on consent to process your personal data.

We will comply with your request where it is feasible to do so, within 30 days of receiving your request. There are no fees or charges for the first request. However additional requests for the same data may become subject to an administrative fee in some circumstances.

To exercise your rights please do so by contacting us using the email or postal address at the end of this notice.

10. Consent

We may rely on legitimate interest or other permitted grounds for processing your personal information. Where we need your consent to process your information, we will ask you to confirm this in writing. Where we do rely on consent, you have the right to change your mind and withdraw that consent at any time by writing to us. If you withdraw your consent, we will cease using any personal information obtained and processed under that consent, unless we have some other legal obligation to continue to use it.

11. Use of Cookies

Canary Wharf Group utilises cookies to enhance your browsing experience. Details can be found in Canary Wharf Group's Cookies Policy on our websites.

12. What can I do if I am not satisfied with how my personal information is processed?

We aim to ensure all information collected about you is done so fairly and lawfully, whilst implementing robust measures to keep your information secure. If you are not satisfied with the information provided in this notice, please contact us in the first instance so we can resolve your queries or provide you with any additional information required.

Please address any queries in relation to this notice, or need more information please do not hesitate to contact us at: dataprotection@canarywharf.com

Or by writing to us at:

Data Protection
Canary Wharf Group
One Canada Square
Canary Wharf
London
E14 5AB

Alternatively, it is your right to contact your local Data Protection Authority and lodge a complaint. In the UK the lead Data Protection Authority is the Information Commissioner. For more information please visit the Information Commissioner's office at www.ico.org.uk/concerns, call them on 0303 123 1113, or write to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

Effective date: November 2024