

## Privacy and Data Protection Policy

### Introduction and purpose

Our privacy and data protection policy sets out Align Property Partners (APP) commitment to protecting information in general and personal data in particular.

### Scope of policy

The policy applies to the information processed by all services delivered by APP and all its employees when conducting the business of APP, all temporary and contract workers, and all contracts delivered by third parties on behalf of APP.

### Policy statements

- APP will comply with the eight Principles of the Data Protection Act (DPA), and follow the guidance of the Information Commissioner's Office (ICO).
- APP will maintain its registration as a data controller with the ICO.
- APP will reply to all requests for personal data made by means of a properly completed Subject Access Request (SAR) within 40 days.
- APP will comply with other relevant legislation and requirements, when handling information, including: Article 8 of the Human Rights Act, the Privacy and Electronic Communications (EC Directive) Regulations 2003, the common law duty of confidence, the Payment Card Industry Data Security Standard (PCI DSS), and APPs Information Security Policy.
- All personal information held in App's records is regarded as confidential. Information will not normally be disclosed to third parties without the consent of the person concerned. Information may normally be disclosed without consent to meet statutory requirements; to comply with a court order; to prevent duplication of payments from public funds; or where there is a compelling public interest in making the disclosure.

### Guidance and further information

This policy is supported by guidance, procedures and advice.

### Compliance

All employees of APP are responsible for actively supporting this policy.

Employees who handle information must familiarise themselves with this policy and supporting guidance.

Information Asset Owners and other managers must ensure that:

- employees are aware of this policy and are sufficiently trained in the handling of information.
- there are appropriate procedures in their service areas to ensure that this policy is complied with.

APP has appointed a Data Protection Officer, who is responsible for supporting compliance with this policy, in particular by:

Ensuring that replies to requests for personal data (SARs) or those made by other means for example by a request under the Freedom of Information Act, are dealt with in accordance with the law;

- Checking and monitoring employee compliance on a routine basis;
- Supporting the development of Privacy Impact Assessments;
- Providing general advice, and awareness where necessary, and supporting the management of incidents;
- Reporting to senior management as appropriate.

Any failure to comply with this policy may result in disciplinary action, which may lead to dismissal, and/or criminal proceedings.

Signed

A handwritten signature in blue ink, appearing to read 'R. Wall'.