

COMMERCIAL LETTINGS PRIVACY NOTICE

About this privacy notice

This privacy notice has been written to provide you with information about how London Luton Airport Limited (trading as Luton Rising) (“Luton Rising”, “we”, “us”, “our”) handles or intends to handle personal information relating to our commercial lettings service in accordance with the UK General Data Protection Regulation (“**UK GDPR**”). This notice relates specifically to our collection and use of personal information of commercial landlords and tenants who engage with our services.

About us

We are London Luton Airport Limited, trading as Luton Rising. We are a private limited company (company number 02020381). Our registered office address is Hart House Business Centre, Kimpton Road, Luton, LU2 0LA. We are registered as a data controller with the Information Commissioner’s Office and our registration number is ZA535129.

We aim to process information about you fairly, lawfully, and in a transparent manner. The aim of this notice is to provide you with sufficient information for you to be able to understand what we are doing with your information. If you are unsure how we are handling information about you or you think we could improve our privacy information, please let us know.

Information we collect

We collect and hold a range of information about you during the course of our relationship with landlords and tenants who engage with our commercial lettings service. This includes:

- Contact details including your name, job title, employer’s details, email address, postal address and telephone numbers.
- Identification documents such as your passport and/or driving licence.
- Property preference details such as types of interest, size, budget, areas and tenure.
- Details of sources of funding.
- Financial records of payments made and received.
- Legal records such as leases and licences.
- Visitor records such as your name, company and car registration number.
- CCTV images.
- Records of your correspondence with us, either through our website, telephone, e-mail or post.
- Your marketing and communications preferences.

This list is not exhaustive, as we hold records of most contacts we have with you, or about you, and we process this information, so we can manage our commercial lettings services.

How information is collected

Generally, the information we hold will have been provided by you (e.g. as you engage with our services), but we may also hold information provided by third parties where this is relevant to your own circumstances, for example if you contacted us via a third party.

We will only ask for personal information that is appropriate to enable us to provide our services to you. In some cases, you can refuse to provide your details if you deem a request to be inappropriate.

Purposes for processing

We have set out below a description of all the ways we plan to use your information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We may process your information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To register you as a landlord or tenant	Contact details Identification documents Property preferences Sources of funding	Performance of a contract
To manage our commercial lettings arrangements	Contact details Financial records Legal records Records of correspondence	Performance of a contract
To manage payments, fees and charges and to collect and recover any money owed to us	Contact details Financial records Records of correspondence	Performance of a contract Necessary for our legitimate interests in order to recover debts due to us
To maintain accurate accounts and records	Contact details Financial records Legal records Records of correspondence	Performance of a contract Necessary to comply with our legal obligations
To conduct anti-money laundering checks	Contact details Source of funding Identification documents	Necessary to comply with our legal obligations
To manage our relationship with landlords and tenants	Contact details Marketing and communications information	Performance of a contract Necessary to comply with our legal obligations
To maintain visitor records at our office	Visitor records	Necessary to comply with our legal obligations

To ensure the safety and security of our premises, staff and visitors	CCTV images	Necessary for our legitimate interests for the prevention or detection of crime
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Our marketing communications

Where you have agreed for us to contact you with updates relating to our commercial lettings service, we will send you information we believe might be of interest to you via email or text message (we call this marketing communications).

You can ask us to stop sending you marketing communications at any by following the unsubscribe links on any marketing communications sent to you or by contacting us at any time.

Sharing personal information

Where necessary or required, we may share your personal information as follows:

- With third party service providers, in connection with services performed on our behalf. For example, our email provider, our website provider, our professional advisors and our consultants assisting with provision of our services.
- With government bodies and law enforcement agencies.
- With third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations.
- In connection with legal proceedings (or where we are instructed to do so by Court order).

Our relationships with third party services providers are governed by contractual provisions with us and they only have access to personal information to perform the described purposes and may not use it for other purposes.

Where we store personal information

The personal information that we collect is stored within the UK and European Economic Area (EEA). However, there may be some circumstances where it is necessary to transfer and store personal information at a destination outside the UK or the EEA. In these circumstances, we will take all steps reasonably necessary to ensure that personal information is treated securely and in accordance with data protection law and, in the event that personal information is transferred outside the UK or the EEA, shall ensure that this is carried out subject to the requirements of the UK GDPR.

How long we keep it for

We will only retain personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We are required to keep information relating to our landlords and tenants for a minimum period of 6 years following the end of our relationship and copies of leases and other legal property records for a period of at least 12 years following completion.

Your rights

Under the UK GDPR and the Data Protection Act 2018, you have the following rights:

- **Right of access** - You have the right of access to information we hold about or concerning you.
- **Right of rectification or erasure** - If you feel that any data that we hold about you is inaccurate you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data.
- **Right to restriction of processing** – In certain circumstances, you have a right to request that we refrain from processing your data.
- **Right of portability** – In certain circumstances, you have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller.
- **Right to object** – In certain circumstances, you have a right to object to our processing of your personal data.
- **Right to withdraw consent** - In the circumstances where you may have provided consent to the collection, processing and transfer of personal information for a specific purpose has been provided, you have the right to withdraw consent for that specific processing at any time.

Please note, there are some specific circumstances where these rights do not apply and we can refuse to deal with your request.

To exercise any of these rights, please contact Luton Rising's Data Protection Officer using the contact details below.

Complaints

If you have a concern about the way we are collecting or using personal information, we would ask that you raise your concern with us in the first instance by using the contact details below.

You also have a right to lodge a complaint with the Information Commissioner's Office (ICO) should you feel that we have not handled your information in line with legislative and regulatory requirements. They can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113 | www.ico.org.uk

Contact Details

For further information on how to request your personal information, exercise any of your data protection rights or request further information in relation to how and why we process your information, you can contact us by emailing the Data Protection Officer at DataProtection@lutonrising.org.uk.

Alternatively, you can write to the Data Protection Officer at the following address:

Data Protection Officer
Hart House Business Centre
Kimpton Road
Luton
LU2 0LA

Changes to this privacy notice

We may change this privacy notice from time to time. This privacy notice was last updated in April 2022.