PRIVACY POLICY

We take your privacy very seriously and we ask that you read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and how to contact us and supervisory authorities in the event you have a complaint.

WHO WE ARE

Cranmer Capital Ltd trading as Folkestone Storage ("we", "us") is the operator of the website www.folkestone-storage.co.uk. We collect, use and are responsible for certain information about you. When we do so, we are regulated under the General Data Protection Regulation ("GDPR") which applies across the European Union (including the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

THE PERSONAL INFORMATION WE COLLECT AND USE

Personal information provided by you

In the course of operating our self-storage business, we collect personal information when you provide it to us, such as your name, postal address, email address, phone numbers, date of birth, and payment details.

We also collect personal information from you if you apply for a job with us or work for us for any period of time. In this context, personal information we gather may include: contact details, financial and payment details, details of education, qualifications and skills, marital status, nationality, NI number, job title, and CV.

Personal information provided by third parties

Occasionally we may receive information about you from other sources (such as credit reference agencies), which we will add to the information we already hold about you in order to help us provide services to you and to improve and personalise our service to you. If you apply for a job with us, we may receive information from the people who provide references.

Personal information about other individuals

If you give us information on behalf of someone else as an alternate contact, referee or next of kin, you confirm that the other person has agreed that you can:

- Å give consent on his/her behalf to the processing of his/her personal data;
- Å receive on his/her behalf any data protection notices; and
- Å if relevant, give consent to the transfer of his/her personal data abroad.

Sensitive personal information

We will not usually ask you to provide sensitive personal information. We will only ask you to provide sensitive personal information if we need to for a specific reason, for example, if we believe you are having difficulty dealing with your account due to illness. If we request such information, we will explain why we are requesting it and how we intend to use it.

Sensitive personal information includes information relating to your ethnic origin, political opinions, religious beliefs, whether you belong to a trade union, your physical or mental health or condition, sexual life, and whether you have committed a criminal offence. We will only collect your sensitive personal information with your explicit consent.

Children

We do not knowingly collect personal data relating to children under the age of 16. If you are a parent or guardian of a child under the age of 16 and think that we may have information relating to that child, please contact us. We will ask you to prove your relationship to the child but if you do so you may (subject to applicable law) request access to and deletion of that child's personal data.

HOW AND WHEN DO WE COLLECT INFORMATION FROM YOU?

We gather information directly from you face to face if you come to our site for information or to sign a storage agreement and over the telephone if you ring us to make an enquiry. We collect personal information via our website and mobile applications or 'Apps' and other technical systems. We collect this when you use our website or Apps to sign up to, participate in or receive a service from us, such as requesting a quote online or entering a live chat. Our website also uses cookies (see "Use of cookies" section below) and collects IP addresses (which means a number that can uniquely identify a specific computer or other device on the internet). We also collect personal information when you contact us, or send us feedback.

We may monitor and record communications with you (such as telephone conversations and emails). We may do this for a number of reasons, such as to check the quality of our customer service, for training purposes, to prevent fraud or to make sure we are complying with legal requirements.

If you visit our storage facility, some personal data may be collected from monitoring devices and systems such as closed-circuit TV (CCTV) and door entry systems at the site.

Use of cookies

A cookie is a small text file which is placed onto your computer (or other electronic device such as a mobile telephone or tablet) when you use our website. We use cookies on our website. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify you individually. We use analysis software to look at IP addresses and cookies to improve your experience as a user of our website. We do not use this information to develop a personal profile of you. If we do collect personally

identifiable information, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

You can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.

For further information on our use of cookies, please see our Website cookie policy. For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org.

REASONS WE CAN COLLECT AND USE YOUR PERSONAL INFORMATION

We rely on a different lawful basis for collecting and using personal data in different situations.

Contracts

Where you make enquiries about storing with us before you become a customer, we need to collect personal information about you so that we can take steps to enter into a contract with you. Once you have become a customer, we need to collect and use personal information to provide services to you and to claim our right to be paid in return for our services under our standard terms of business/contract with you. This includes collecting and using your personal information to:

- Å enable us to follow up on enquiries made by you in relation to storing with us in accordance with industry guidelines and to give you our quote;
- Å do a credit check—see 'Credit checking' section below;
- Å prepare a storage agreement with you and arrange insurance cover if required;
- Å manage any accounts you hold with us;
- Å contact you for reasons related to the service you have signed up for or to provide information you have requested;
- Å deal with payment for our services;
- Å notify you of any changes to our website or to our services that may affect you; and
- Å resolve disputes or collect overdue payments.

If you apply for a job with us, we will collect and use personal information to process your application and check references. If you take a job with us, we will collect and use your personal information to enter into an employment contract with you and to administer the employment relationship, including making payments to you, accounting for tax, ensuring safe working practices, monitoring and managing staff access to systems and facilities, monitoring absences and performance and conducting assessments.

Legal obligations

We collect and use personal information from our customers and staff to comply with our legal obligations. For example, we will take copies of documents that identify you so that we can comply with anti-money laundering and counter-terrorist financing requirements.

Legitimate business interests

Our priority is to make sure we give a high quality and secure service to customers and to follow up effectively on enquiries even though we accept that not all enquiries will lead to a business relationship or contract. We collect personal information to:

- follow up on enquiries in accordance with industry guidelines and provide quotes for storage/details of offers;
- conduct research and analyse website visitor behaviour patterns;
- customise our website and its content to your particular preferences;
- improve our services;
- detect and prevent fraud;
- prevent offensive, inappropriate or objectionable content being sent to or posted on our websites or to stop any other form of disruptive behaviour.

It is a key feature of our storage service that we operate CCTV within the storage facility. We collect and process CCTV images

- so we can fulfil our contractual obligation to deliver a secure self-storage environment;
- to establish whether you are doing something that breaches your contract with us; and
- to assist in the establishment or defence of any crime or other investigation.

If we propose to use your information for any other uses we will ensure that we notify you first. If we need your consent to use your information for these other purposes, we will give you the opportunity to opt in or to refuse. If you opt-in, you will be able to opt-out at any time.

Credit checking

We may do a credit check on you so that we can make credit decisions about you and people or businesses associated with you. These checks may also be used to help prevent and detect fraud and money laundering.

Our search will be recorded on the files of the credit reference agency.

We may also disclose information about how you conduct your account to credit reference agencies and your information may be linked to records relating to other people living at the same address or who are financially linked to you.

Other credit businesses may use your information to make credit decisions about you and the people with whom you are financially associated, trace debtors, and prevent and detect fraud and money laundering.

If you provide false or inaccurate information to us and we suspect fraud, we will record this.

When will we contact any other person about you?

If you provide us with details of any other person we can contact to discuss your account, we may contact that person and discuss and share the details of your account with that person and deal with that person in relation to your account as if that person was you. We may particularly want to do this if we are unable to get in touch with you for any reason. If you change your mind, you can email or write to us and have this person taken off your account as an alternate contact person (see '***How can you contact us?'*** below).

If you provide us the details of a person who we can contact for a job reference, we may contact that person in connection with your job application.

Who your information might be shared with

We may disclose your personal data to:

- Å service providers under contract with us to support our business operations, such as fraud prevention, debt collection, payroll, technology services;
- Å credit reference agents—see 'Credit checking' above;
- Å our insurers and insurance brokers if you take out insurance cover through us;
- Å trade associations of which we are a member;
- Å law enforcement or government agencies in connection with any investigation to help prevent or detect unlawful activity;
- Å any person or agency if we need to share that information to comply with the law or to enforce any agreement we may have with you or to protect the health and safety of any person;
- Å any person who you have named as a person we can contact to discuss your account;
- Å any person who is your agent or representative, such as the holder of a power of attorney, a legal guardian or person administering a will;
- Å any person who we are negotiating with as a potential buyer of our business or property or if we are proposing to merge our business with another business;
- Å credit card associations if specifically required;

If we pass data on to insurers, they may enter your data onto a register of claims which is shared with other insurers to prevent fraudulent claims. If we use an outside party to process your information, we will require them to comply with our instructions in connection with the services they provide for us and not for their own business purposes.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those people processing

your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We will use measures to safeguard your personal data, for example:-

- Access to your personal account paperwork is stored in a locked cupboard;
- We store your personal data on secure servers.

We have procedures in place to deal with any suspected data security breach. We will notify you and any applicable supervisory body of a suspected data breach where we are legally required to do so.

While we will use all reasonable efforts to keep your personal data safe, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that is transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (see '***How to contact us***' below).

Our website contains links to websites and applications owned and operated by other people and businesses. These third party sites have their own privacy policies and use their own cookies and we recommend that you review them before you provide them with personal information. They will tell you how your personal information is collected and used whilst you are visiting these other websites. We do not accept any responsibility or liability for the content of these sites or the use of your information collected by any of these other sites and you use these other sites at your own risk.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

TRANSFERS OF YOUR PERSONAL INFORMATION OUT OF THE EEA

We will not transfer your personal data outside of the United Kingdom or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will usually hold your personal information as a customer or employee on our system for the period we are required to retain this information by applicable UK law, currently 6 years from the end of our contract or 6 months after any unsuccessful job application, unless you have told us you want us to delete the information earlier (see section "***What rights do you have***" below).

WHAT RIGHTS DO YOU HAVE?

Under the General Data Protection Regulation you have a number of important rights. These include the following rights:-

- request a copy of your information which we hold (subject access request);
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations
- require us to stop contacting you for direct marketing purposes;
- object in certain other situations to our continued processing of your personal information;
- restrict our processing of your personal information in certain circumstances;
- object to decisions being taken by automated means which produce legal effects concerning you or which affect you significantly; and
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.

Further information on each of these rights is available from the Information Commissioner's Office.

If you would like to exercise any of these rights, please:

- Å email, call or write to us (see '***How to contact us***' below)
- Å provide proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- Å let us know the information to which your request relates, including any account or reference numbers, if you have them

We will not charge any fee for any of these services in most cases.

HOW TO CONTACT US

We hope that we can resolve any query or concern you may raise about the way we use your personal information. Please contact us if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us, please send an email to contact@folkestone-storage.co.uk or write to us at 104 Foord Road, Folkestone, Kent, CT19 5AB or call us on 01303 850630.

The General data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns/ or telephone 0303 123 1113.

CHANGES TO THE PRIVACY POLICY

This Privacy Notice was published on 1st May 2018 and last updated on 12th June 2018. We may change this Privacy Notice from time to time. You should check this policy occasionally to ensure you are aware of the most recent version.

DO YOU NEED EXTRA HELP?

If you would like this policy in another format (for example: audio, large print, braille) please contact us (see '***How can you contact us***?' above).