

## Privacy Notice

### Introduction

The Romulus Holdings Group and its subsidiaries Romulus Holdings Limited, Romulus Dominion Limited, Romulus Shortlands Limited, Romulus City Limited, Romulus Investments Limited, Romulus Construction Limited, Huddle Shortlands Limited, Romulus Securities Limited, Romulus Wimbledon Limited ("the Romulus Group") is the Data Controller over any personal data we process about you for the purposes set out in this Privacy Notice (see below).

This notice outlines what personal data the Romulus Group collects and processes about you when you interact with the Romulus Group websites (see below); contact us by phone, email, enquiry form or face to face; subscribe to our mailing lists; book an office, meeting room or and/or hot desk; provide feedback to us on any of our developments or properties; or use our premises as a staff member of one of our clients. It also covers use of CCTV at our premises. This notice does not cover personal data we process about our staff

The categories of data subjects whose personal data is covered by this privacy notice include:

- Members of the public including visitors at our locations;
- Professional contacts e.g. individuals working at intermediaries or our clients that we engage with to support professional relationships;
- Staff of our clients that lease office space from us;
- Individuals that may lease our property, office space, hot desk or meeting rooms e.g. sole traders or common law partners.

The websites covered by this privacy notice include:

- romulusperks.com
- Romulusuk.com
- romuluscustombuild.com
- hammersmithcampus.com
- 10dominionstreet.com
- 3shortlands.london
- 30cannonstreet.com
- glenhousew6.com
- thetrianglew6.com
- spaceonelondon.com
- huddle.london
- 101eustonroad.co.uk
- futureofcentrecourt.com
- wimbledonquarter.com

### Who is the Data Controller?

The Data Controller of any personal data collected when you contact us will be the particular group company that you contact e.g. if you contact Romulus Holdings Limited through a contact form, the Data Controller shall be Romulus Holdings Limited. Lastly, the Data Controller of any personal data collected via CCTV at our office locations, shall be the group company that operates the CCTV.

Please read through the privacy notice to understand how the Romulus group uses and processes your personal data obtained. If you have any concerns about our processing of your personal data or you have a general enquiry in relation to data protection, please contact our Data Protection Officer at [dataprotection@romulusuk.com](mailto:dataprotection@romulusuk.com).

#### What is personal data?

**Personal Data:** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Special Category of Data:** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

When we use the term 'personal data' we mean both personal data and special category of data.

#### How will we use your personal data?

Personal Data is collected in several different ways dependent on your interaction with the Romulus Group. The table below sets out what personal data we process about you, where we get it from, why we use it and our lawful basis and who we share it with. Otherwise we will only share your personal data:

1. where we are required to share your personal data in accordance with law e.g. such as to assist with investigations carried out by the police, HMRC, other authorities or any regulatory requirement to which the Romulus Group is subject;
2. where we are undergoing a corporate restructure or sale;
3. where we use third parties to undertake certain services on our behalf and in doing so they require to process personal data in order to do this. If so, we will ensure that adequate arrangements are in place to protect your personal data. These third parties include: our professional advisors, our DPO, cloud storage suppliers, our management platforms, our CRM supplier, our online engagement tool provider, marketing platforms, IT infrastructure suppliers, 3<sup>rd</sup> party payment platforms, debt collection agencies, facilities management, mailing houses, credit reference agencies, external contractors;
4. where we need to share it with another company within the Romulus Group;
5. where we have your consent.

## How the Romulus Group uses your Personal Data

	<b><u>Purpose (categorised by data subject)</u></b>	<b><u>Personal Data</u></b>	<b><u>Where do we get it from?</u></b>	<b><u>Legal Basis</u></b>
<b>1</b>	<p><b>Members of the Public/Visitors to our Locations:</b></p> <ul style="list-style-type: none"> <li>• To respond to enquiries.</li> <li>• To process the information which you provide when you engage with our surveys or provide commentary or feedback on our developments or one of our properties.</li> <li>• To manage visitors in our locations.</li> <li>• To send you our newsletter or other marketing communications.</li> <li>• To build a profile of individuals that we engage with for the purposes of understanding our customers and other users.</li> <li>• To use our Wi-Fi in our locations.</li> <li>• Managing car parking at our Locations.</li> </ul>	Name, email, telephone number, postcode, the registration number of your car and any other information you provide to us including your marketing preferences.	From you, when you submit an enquiry to us, provide feedback or sign up to receive marketing from us, attend our events, visit our locations and/or when you enter the car park at our locations.	<p>Legitimate Interest – it is in our legitimate interest to respond to your enquiries or process your feedback to improve our service offering. It is also in our legitimate interest to understand who is visiting our locations, provide Wi-Fi and manage our car parking. It is also in our legitimate interest to understand the demographics of individuals who attend our events to tailor and improve our events in the future.</p> <p>Consent – we will not send you marketing information without your consent.</p> <p>Contract – we pay process your car registration number in order to perform our contract with you in the provision of car parking facilities.</p>
<b>2</b>	<p><b>Staff members of our Clients/Tenants/Potential Clients:</b></p> <ul style="list-style-type: none"> <li>• To provide you with service related information about our office space e.g. fire exits, help desk etc.</li> <li>• To provide you with direct marketing by email as a representative of our client,</li> </ul>	All personal data listed above in Row 1. Plus work related email.	You, as per Row 1.  Your employer.	<p>As per Row 1.</p> <p>Legitimate Interest – it is in our legitimate interest to inform you of information necessary to fulfil our contract with your employer and ensure that you are fully aware of the benefits of our office locations and the communities we have built which</p>

	<p>your employer to ensure you benefit from our services which we commit to provide to your employer e.g. special offers available within the office or office community events.</p> <ul style="list-style-type: none"> <li>• For all purposes which are outlined in Row 1 – Members of the Public/Visitors to our locations.</li> </ul>			<p>your employer wishes you to have access to.</p>
<b>3</b>	<p><b>Sole Traders/Common Law Partners we supply services to: –</b></p> <ul style="list-style-type: none"> <li>• To manage our relationship with you as a new tenant or user of our hot desks/meeting rooms.</li> <li>• This includes carrying out credit reference checks, processing and collecting rental payments in respect of tenancy or bookings to include managing payments, fees and charges and collecting and recovering monies owed to us.</li> <li>• To send you service communications about your use of our hot desks/meeting rooms.</li> <li>• To send you marketing communications.</li> <li>• For all other purposes which are outlined in Row 1 – Members of the Public/Visitors to our locations.</li> </ul>	<p>All personal data listed above in Row 1. Plus financial information and any other information you provide to us.</p>	<p>You.</p>	<p>As per Row 1.</p> <p>Performance of a Contract- it is necessary to process information about you to provide you with our services and part of that is providing service communications.</p> <p>Legitimate Interest – it is in our legitimate interest to manage our relationship with you and recover payment for our services.</p> <p>Consent – we will not send you marketing communications without your consent.</p>
<b>4</b>	<p><b>Professional Contacts:</b></p> <ul style="list-style-type: none"> <li>• To record you as the point of contact for one of our intermediaries or suppliers,</li> </ul>	<p>As per Row 1</p>	<p>You or your employer.</p>	<p>As per Row 1</p> <p>Legitimate Interest – it is in our legitimate interest to use your personal data to manage our relationship with your</p>

	<p>where they are corporate entities in order to manage the relationship.</p> <ul style="list-style-type: none"> <li>To send you service communication about our service.</li> <li>To send you marketing communications by email or text of things we think you may find interesting about our services.</li> <li>For all other purposes which are outlined in Row 1 – Members of the Public/Visitors to our locations.</li> </ul>			<p>employer. This includes providing you with service and marketing communication.</p>
<b>5</b>	<p><b>Visitors to our Shopping Centres:-</b></p> <ul style="list-style-type: none"> <li>To understand where visitors of the Shopping Centre are visiting us from.</li> <li>For all purposes which are outlined in Row 1 – Members of the Public/Visitors to our locations.</li> </ul>	As per Row 1	You.	<p>As per Row 1.</p> <p>Consent – to provide access to our Wi-Fi and understand where our visitors are from.</p> <p>Consent – we will not send you marketing information without consent.</p>
<b>6</b>	CCTV	CCTV and video surveillance	Through the use of CCTV at our premises.	<p>Legitimate Interest – it is in our legitimate interest to record CCTV footage at our premises for the purposes of health and safety and prevention of crime.</p>
<b>7</b>	To manage our website including to understand usage and how we can improve our websites.	This includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plugin types and versions, operating system and platform and other technology	You.	<p>Legitimate Interest for strictly necessary cookies.</p> <p>Consent for cookies that are not strictly necessary.</p> <p>For more information on how we use cookies, please see our cookie notice.</p>

		on the device if you use to access our website.		
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### Will we share your Personal Data outside of the UK

We do not envisage transferring your personal data outside of the UK.

Where we need to share personal data outside of the UK, we will always put in place appropriate safeguards to protect your personal data and any necessary supplementary measures required under Data Protection Law.

### Security

Romulus treats the security of your personal data seriously and shall enforce strong physical and electronic safeguards while in storage and in transit.

### Retention

Romulus shall keep your personal data for as long as is necessary to fulfil the purpose of processing.

### Your rights

You have certain rights under data protection law, which are summarised below. You can exercise these by contacting our DPO on [dataprotection@romulusuk.com](mailto:dataprotection@romulusuk.com)

- you can withdraw your consent (including for marketing) at any time, at which point we shall stop processing your personal data in that way. Please note this does not affect the legality of our processing up to the date of your withdrawal of consent.
- You can seek to restrict our processing of your personal data, ask us to rectify any personal data we hold about you or object to us processing your personal data for the purposes stated above.
- You have the right to access personal data held by us about you.
- In certain circumstances you have the right to ask us to provide you with your personal data in a structured, commonly used and machine-readable format to allow you (or us on your behalf) to transmit this information to another party.
- In certain circumstances you have the right to ask us to erase the personal data we hold about you. We will consider any such request in line with UK GDPR. Please note this is not an absolute right and there may be circumstances where we choose not to delete all of the personal data we hold about you.
- You have the right to lodge a complaint with the Information Commissioners Office (ICO) if you think that we have infringed your rights. You can find more information about reporting a matter to the ICO at the following link: <https://ico.org.uk/>

### Website

This website may contain links to other websites. Please note that the Romulus group has no control of websites outside our domain. The Romulus group is not responsible for the protection and privacy of any sensitive information provided to a website linked to this website.

### Changes

We reserve the right to amend this privacy notice from time to time.

Last Updated: August 2023