

## PRIVACY POLICY

At Lee Baron, we are committed to safeguarding and preserving the privacy of our visitors. This Privacy Policy explains what happens to any personal data that you provide to us, or that we collect from you whilst you visit our website or share with us in any other way in the context of the services we provide, in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We review and update this Policy annually. The next review is due in January 2027.

### Controller

For the purposes of the Data Protection Regulations, we are not always the 'data controller'. This means that on occasion we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection legislation to notify you of the information contained in this privacy policy.

### Contact

If you have any questions about this privacy policy or our privacy practices, including any requests to exercise your legal rights, you may make contact via e-mail or post:

Full name of legal entity: Lee Baron Ltd

E-mail address: datacontroller@leebaron.com

Postal address: 41 Foley Street, London, W1W 7TS

### Information We Collect

In running and maintaining our business we may collect and process the following data about you:

- Information about your use of our website including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data.
- Information provided voluntarily by you. For example, when you register for information.
- Information that you provide when you communicate with us by any means.
- Information from third parties and/or publicly available resources (including for example, from your employer, your agent, your bookkeeper, your bank, your IFA, mortgage lenders or landlords seeking a reference, your former accountant, HMRC, Companies House).

### Use Of Your Information

We use the information that we collect from you to provide our services to you. In addition to this we may use the information for one or more of the following purposes:

- To provide information to you that you request from us relating to our products or services.
- To provide information to you relating to other products that may be of interest to you. Such additional information will only be provided where you have consented to receive such information.
- To inform you of any changes to our website, services or goods and products. If you have previously purchased goods or services from us we may provide to you details of similar goods or services, or other goods and services, that you may be interested in. Where such consent has been provided it can be withdrawn by you at any time.

Document Reference	ITC-POL-001	Date	Jan 2026	Corporate	<input checked="" type="checkbox"/>	Operational	<input checked="" type="checkbox"/>
Lee Baron Privacy Policy, v2, I Jones							

We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are a tenant, lessee, landlord, subcontractor, supplier or customer of our client.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

#### Storing Personal Data

In operating our business it may become necessary to transfer data that we collect from you to locations outside of the European Union for processing and storing. By providing your personal data to us, you agree to this transfer, storing or processing. We do our upmost to ensure that all reasonable steps are taken to make sure that your data is treated stored securely. Unfortunately the sending of information via the internet is not totally secure and on occasion such information can be intercepted. We cannot guarantee the security of data that you choose to send us electronically. Sending such information is entirely at your own risk.

#### Disclosing Your Information

We will not disclose your personal information to any other party other than in accordance with this Privacy Policy and in the circumstances detailed below:

- In the event that we sell any or all of our business to the buyer.
- Where we are legally required by law to disclose your personal information.
- To further fraud protection and reduce the risk of fraud.

#### Third Party Links

On occasion we include links to third parties via our website and other tech platforms. Where we provide a link it does not mean that we endorse or approve that website's policy towards visitor privacy. You should review their privacy policy before sending them any personal data.

#### Access to Information

In accordance with the General Data Protection Regulation (GDPR), you have the right to access any information that we hold relating to you.

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## CCTV, ANPR and EACS

This section of the policy applies to the management of personal data collected by CCTV, ANPR and/or Electronic Access Control Systems (EACS) at sites operated or managed by Lee Baron. In the cases of sites managed by Lee Baron, the data is processed on behalf of the system owner as registered with the ICO.

Sufficient CCTV signage will be installed to indicate the owner or controller of each system.

Where these systems are able to process data which by itself or with other data available to us can be used to identify you, this is known as personal data.

This Privacy Policy sets out how we use that personal data. If you have any questions including site specific details of whether or not a particular site you are or are about to visit has a CCTV, ANPR and/or Access Control System installed, which does or could process your personal data and where and if data processors are operating for and on behalf of us at that site, please do contact us to clarify this.

Only suitably trained staff will be permitted to review CCTV images at any time.

We take the security of your personal data very seriously and take a stringent approach to data protection including its secure storage and taking the appropriate technical, physical and organisational steps to protect it. We regularly evaluate whether it is necessary and proportionate to use such systems at each of the sites for which we are responsible as Data Controllers.

Prior to disclosing any CCTV footage, we seek the advice of a specialist data protection advisory service to protect your personal data from inappropriate or wrongful disclosure. Typically, no CCTV information will be released unless it is formally requested by the appropriate law enforcement agencies, or where the images requested are of your own personal data.

The lawful basis for processing personal data by the use of CCTV, ANPR and/or Access Control is for the legitimate interest of the Data Controller or that of other persons or organisations.

We will use the data obtained for the purposes of:

- Good property management,
- Maintaining the security of the premises and the prevention and investigation of crime.
- To monitor goods and services.
- For health and safety.
- For Protecting the rights, property and for the personal safety of the occupiers of the buildings, including the staff and the tenants, visitors to the buildings including, the tenant's staff, visitors to the building or premises including members of the public and those of Lee Baron.
- When you exercise your rights under data protection law and make requests
- Based on your consent. When you request us to disclose your personal data to other people or organisations such as a company handling a claim on your behalf, or otherwise agreed to disclosures:
- For the security and wellbeing of equipment and vehicles

Recorded data will be kept for a limited period only usually a maximum of 30 days and are then erased. The exception is where images are required for evidential purposes or another legally valid reason including responses to your legal rights (subject rights).

## Your Rights Under Applicable Data Protection Law

Document Reference	ITC-POL-001	Date	Jan 2026	Corporate	<input checked="" type="checkbox"/>	Operational	<input checked="" type="checkbox"/>
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Your rights are as follows:

- The right to be informed about the processing of your personal data;
- The right to have your personal data corrected if it's inaccurate and to have incomplete personal data completed.
- The right to object to processing of your personal data
- The right to have your personal data erased (the "right to be forgotten")
- The right to request access to your personal data and information about how we process it (Subject Access requests)
- The right to move, copy, or transfer your personal data (data portability) and
- Rights in relation to automated decision-making including profiling

Complaints

If you believe that your personal data has been mis-handled at any time, you have the right to make a data protection complaint to the relevant supervisory authority. However, before doing so, we do request that you follow the process within our Complaints Handling Procedures for both consumer and B2B.

If we have been unable to resolve your concerns and you wish to lodge a complaint with a supervisory authority, which is The Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk))

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Lee Baron Privacy Policy, v2, I Jones							