



## GLOBAL PRIVACY STATEMENT

**City Facilities Management Holdings Limited is committed to protecting the privacy and security of personal information.** This privacy statement covers a number of companies within the City group, each of which processes your personal information for different purposes. Further information is provided at the *Legal Information* section at the end of this privacy statement.

**This privacy statement describes how we collect and use personal information, in accordance with the General Data Protection Regulation (GDPR).**

In this privacy statement, references to “our website” refers to the following websites of the City Group: -

- [www.cityfm.com](http://www.cityfm.com)
- <https://www.cityfm.us/>
- <http://www.cbes.co.uk>
- [www.cityholdings.com.au](http://www.cityholdings.com.au)
- <http://www.atriummaintenance.com>
- <https://www.cityholdings.asia/index.html>

### Types of personal information we collect

We may collect, use and store different types of personal information about you, which we have grouped together as follows:

Types of personal information	Description
<i>Identity Data</i>	<i>ID information including your name, marital status, title, date of birth, gender and National Insurance Number</i>
<i>Contact Data</i>	<i>Where you live and how to contact you</i>
<i>Financial Data</i>	<i>Your financial position, status and history, including bank details and credit rating</i>
<i>Social-demographic</i>	<i>Details about your work or profession, nationality, and education.</i>
<i>Contractual</i>	<i>Details about the services we provide to you</i>
<i>Transactional Data</i>	<i>Details about payments to and from you and other details about services you purchase from us</i>
<i>Contractual Data</i>	<i>Information obtained by providing services to you</i>
<i>Communications Data</i>	<i>What we learn about you from letters, emails and conversations between us</i>
<i>Publicly Available Data</i>	<i>Details about you that are publicly available, such as on Companies House or elsewhere on the internet</i>
<i>Marketing Data</i>	<i>Details about your preferences in receiving marketing communications from us and our third parties</i>
<i>Consents Data</i>	<i>Any permissions, consents or preferences that you give us</i>
<i>Usage Data</i>	<i>Privacy Statement General</i>

<p><i>Special Categories of more sensitive data</i></p>	<p><i>Some types of personal data are defined as special. We will only collect and use these types of data if the law allows us to:</i></p> <ul style="list-style-type: none"> <li><i>Racial or ethnic origin</i></li> <li><i>Religious or philosophical beliefs</i></li> <li><i>Trade union membership</i></li> <li><i>Health data including any injury you may sustain in an accident</i></li> <li><i>Criminal convictions data</i></li> </ul>
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## How we use your personal information

In general terms, we collect and use personal information to:

- *deliver our services and meet our legal responsibilities*
- *verify your identity where this is required*
- *contact you by post, email or telephone*
- *understand your needs and how they may be met*
- *maintain our records*
- *process financial transactions*
- *prevent and detect crime, fraud or corruption*

More specifically, the table below explains how we use your personal information and the reasons that we rely on in doing so. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>• <i>To deliver our services</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Contractual performance</i></li> <li>• <i>Legitimate interests</i></li> <li>• <i>Legal obligations</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Being efficient about how we fulfil our legal and contractual duties</i></li> <li>• <i>Complying with regulations that apply to us</i></li> </ul>
<ul style="list-style-type: none"> <li>• <i>To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance and audit</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Legitimate interests</i></li> <li>• <i>Legal obligations</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Being efficient about how we fulfil our legal duties</i></li> <li>• <i>Complying with regulations that apply to us</i></li> </ul>
<ul style="list-style-type: none"> <li>• <i>To exercise our rights set out in contracts and agreements</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Contractual performance</i></li> </ul>	
<ul style="list-style-type: none"> <li>• <i>To carry out credit checks</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Legitimate interests</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>To assess the financial worthiness of those to whom we may provide services to assess their ability to pay any sums due for those services</i></li> </ul>
<ul style="list-style-type: none"> <li>• <i>To contact you in the course of providing our services to the organisation</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Legitimate interests</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>To provide the organisation with legal services and fulfil our contractual obligations</i></li> <li>• <i>To keep our records up to date,</i></li> </ul>

<ul style="list-style-type: none"> <li>To carry out identity verification, background checks and anti-money laundering procedures (directors, officers, partners, shareholders/owners only)</li> </ul>	<ul style="list-style-type: none"> <li>Legal obligation</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To engage the organisation as a client and allow us to provide you with legal services</li> <li>To protect our reputation</li> </ul>
<ul style="list-style-type: none"> <li>To improve our products and services and develop new ones</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> </ul>	<p>To improve our efficiency and provide clients with new or improved products and services</p>
<ul style="list-style-type: none"> <li>For marketing and business development activities, including seeking new business, promoting our business and events management</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Soft opt-in (i.e. where we have an existing relationship that allows us to send electronic marketing communications to you on an opt-out basis)</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To develop our relationship with you and the organisation</li> <li>To attract new business</li> <li>To promote our business</li> <li>To provide corporate hospitality to promote our business and its services</li> <li>To seek your consent if we need it to contact you</li> </ul>
<ul style="list-style-type: none"> <li>For data analysis, testing, research, statistical and survey purposes</li> <li>For analytical purposes relating to electronic marketing communications that we issue</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> <li>Consent (where required by law)</li> </ul>	<ul style="list-style-type: none"> <li>To understand how our communications are used and what content is accessed by those who receive them</li> <li>Data management for marketing and business development purposes</li> <li>To assess which of our services may be of interest to you and to tell you about them</li> <li>Improving our systems and services</li> </ul>
<ul style="list-style-type: none"> <li>To receive the products or services you provide to us</li> </ul>	<ul style="list-style-type: none"> <li>Contractual performance</li> <li>Legal obligation</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>For firm management</li> <li>To maintain access and control records</li> <li>For incident/breach reporting, management and investigation</li> </ul>
<ul style="list-style-type: none"> <li>For procurement purposes, including supplier due diligence, background checks and the assessing of tenders</li> <li>To carry out credit checks</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To carry out supplier due diligence</li> <li>To ensure our contracts provide us with best value</li> <li>To assess the financial worthiness and reliability of those with whom we deal</li> </ul>

<ul style="list-style-type: none"> <li>• For financial administration, including calculating and managing payments, benchmarking, calculating fees and interest and collecting and recovering money that is owed to us</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual performance</li> <li>• Legitimate interests</li> <li>• Our legal duties</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our contractual obligations to you or your organisation</li> <li>• To ensure that we benefit from the terms of the contracts we have entered into and properly manage the risks and liabilities associated with them</li> <li>• To comply with laws and regulations that apply to us</li> </ul>
<ul style="list-style-type: none"> <li>• To manage our business properly</li> <li>• For corporate activity, such as a sale, transfer, merger or re-organisation of our business</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Contractual performance</li> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• To manage our business efficiently and properly in accordance with normal business practices, legal requirements and to optimise its value for shareholders</li> <li>• To ensure that we run our business in accordance with good business principles and meet corporate governance, accounting and audit standards</li> </ul>
<ul style="list-style-type: none"> <li>• To prevent crime and for public safety, including through the use of CCTV</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• To manage the risk of crime and safety for us, our employees and our clients</li> <li>• To develop and improve how we deal with crime</li> <li>• To report criminality or the suspicion of criminality for the wider benefit of society</li> <li>• To be efficient about how fulfilling our responsibilities generally</li> </ul>
<ul style="list-style-type: none"> <li>• To register you as a visitor to our premises in accordance with our visitor access policies</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligations</li> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• To prevent crime and for public safety (including the safety of our own employees)</li> <li>• To keep City's premises safe and secure</li> <li>• For incident/breach reporting, management and investigation</li> </ul>
<ul style="list-style-type: none"> <li>• To ensure your health and safety when on our premises</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligations</li> <li>• Vital interests</li> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• To ensure your health and safety whilst on our premises</li> <li>• To ensure a safe working environment for our staff</li> </ul>

<ul style="list-style-type: none"> <li>To keep our premises secure</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To restrict access to our premises to authorised persons</li> <li>To prevent crime and ensure public safety</li> </ul>
<ul style="list-style-type: none"> <li>To ensure your health and safety when on our premises or on premises for which we are responsible</li> </ul>	<ul style="list-style-type: none"> <li>Legal obligations</li> <li>Vital interests</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To ensure your health and safety whilst on premises for which we are responsible</li> <li>To ensure a safe working environment for our staff and others</li> </ul>
<ul style="list-style-type: none"> <li>To report any incidents on our premises or on premises for which we are responsible</li> </ul>	<ul style="list-style-type: none"> <li>Legal obligations</li> <li>Vital interests</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To ensure your health and safety whilst on our premises or on premises for which we are responsible</li> <li>To ensure a safe working environment for our staff and others</li> <li>To notify our insurers, regulators and other interested parties</li> </ul>
<ul style="list-style-type: none"> <li>To establish, enforce and defend legal claims</li> </ul>	<ul style="list-style-type: none"> <li>Legal claims</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To comply with laws and regulations that apply to us</li> <li>To respond to questions or complaints</li> <li>To maintain records to evidence matters that may be in dispute</li> </ul>

### Where we collect your personal information from

We may collect personal information about you (or your business) from the following sources:

- Data you give to us: e.g. When you talk to us over the phone / email us /submit information on a portable device or via the post.
- Directly from the organisation for whom you work and the organisation's website
- Credit reference agencies and fraud prevention agencies
- Publicly available resources, such as Companies House and local authorities
- The internet and social networking sites such as LinkedIn
- Intermediaries such as professional firms who know you
- Cookies (See Policy at the very end of the document)

### Who we share your information with

We may share your personal information with the following third parties:

- Your organisation and your colleagues within it
- Our anti-money laundering service provider
- Agents and service providers who we utilise in the provision of our products and services, including banks, insurers, insurance brokers, our legal and other professional advisors, sub-



contractors, external quality assessors and event organisers (if we are organising an external event which you are attending)

- The police and other law enforcement agencies, HMRC and other government bodies where it is necessary to do so for the purpose of providing you with our services, or where we have a legal or regulatory obligation to do so
- Public information resources, such as Companies House
- Relevant regulators, including the Information Commissioner's Office in the event of a personal data breach, the Health and Safety Executive and local authorities
- Emergency services
- Credit reference agencies and fraud prevention agencies
- Other professional advisors and agents engaged by your organisation
- Other companies within the City group of companies
- Potential or actual purchasers of any part of our business or assets, or other third parties in the context of a possible transfer or restructuring of our business

### **Automated decisions**

We do not envisage taking any decisions about you based solely on automated processing (i.e. without human involvement), which have a legal or similarly significant effect on you.

### **How long we keep your personal information**

We will only retain your 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. These purposes including the establishment, pursuit or defence of legal claims.

In general terms, we will retain personal data for the duration of our relationship with you and, thereafter, for a minimum period of 6 years or such other period as is required by law. The rules that apply to determine how long it is appropriate to hold records for particular matters can be complex and varied. If you wish to know how long we may hold your particular personal information as a record of a particular matter then please e-mail **DPO@City-Holdings.co.uk**.

### **Where we hold your personal information internationally**

[Data is not held internationally, however should the need arise in the future the Data Protection Officer will complete a full Data Protection Impact Assessment (DPIA) before proceeding, to ensure that appropriate safeguards are put in place. These may include

- ensuring that your information is only transferred to countries that have been recognised by the EU as adequate protecting personal information to the same standards as the EU
- putting in place a contract with the recipient of your information which requires them to protect that information to the same standards as if the information were being processed within the EEA

The safeguards we use will depend on the location of the recipient, the function they are performing and the personal information being transferred.

OR

We process personal information in countries around the world where we have operations. If you are within the European Economic Area (EEA), we may transfer your personal information to countries outside the EEA for the purposes of carrying out our obligations under our contract with our customers/vendors, to operate our business, and/or to comply with legal obligations. Some of the countries outside the EEA in which we operate, are not covered by an adequacy decision by the European Commission which means that such countries are not deemed to provide an adequate level of protection for your personal information. However, in such cases, we will take appropriate



measures to safeguard your personal information in a way that complies with relevant data protection laws. These measures may include approved standard data protection clauses, binding corporate rules, and/or the EU-US Privacy Shield Framework.]

## Your rights

We are committed to complying with all applicable data protection laws that apply to our processing of your personal information. This privacy statement applies on a worldwide basis across our operations, unless it conflicts with the laws in any particular jurisdiction, in which case we will process personal information in accordance with those laws to the extent they apply. While this privacy statement is designed, in part, to satisfy the requirements of the EU General Data Protection Regulation (GDPR) and to apply standards which are generally consistent with it, this privacy statement does not create GDPR rights for individuals whose personal information is being processed outside the scope of the application of GDPR.

Under applicable data protection laws and regulations, you may have various rights in relation to your personal information. In particular, where GDPR applies, you have a right to:

**Access to your information** – You have the right to request a copy of the personal information about you that we hold.

**Correcting your information** – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

**Deletion of your information** – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and you have withdrawn your consent – see *Withdrawing consent to using your information* below
- You have validly objected to our use of your personal information – see *Objecting to how we may use your information* below
- Our use of your personal information is contrary to law or our other legal obligations.

**Objecting to how we may use your information** – You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest or pursuant to the legitimate interests of us or a third party then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

**Restricting how we may use your information** – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

**Portability** – if we process personal information that you provide to us on the basis of consent or because it is necessary for the performance of a contract to which you are party, and in either case that processing is carried out by automated means, then you have the right to have that personal information transmitted to you in a machine readable format. Where technically feasible, you also have the right to have that personal information





transmitted directly to another controller.

**Withdrawing consent using your information** – Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in the *Contact information and further advice* section if you wish to exercise any of these rights.

### **Changes to our privacy statement**

We keep this privacy statement under regular review and will place any updates on this website. Paper copies of the privacy statement may also be obtained from the Data Protection Officer (DPO) via the following email address [DPO@City- Holdings.co.uk](mailto:DPO@City-Holdings.co.uk).

This privacy statement was last updated on December 2019

### **Contact information and further advice**

We have appointed a Data Protection Officer. If you have any questions about this privacy statement or how we handle your personal information please contact the data protection officer by e-mailing [DPO@City-Holdings.co.uk](mailto:DPO@City-Holdings.co.uk).

### **Complaints**

We seek to resolve directly all complaints about how we handle personal information but in some jurisdictions, you also have the right to lodge a complaint with the relevant regulatory body:

#### **UK: Information Commissioner's Office**

Online: <https://ico.org.uk/global/contact-us/email/>

By phone: 0303 123 1113

By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK95AF

#### **France: Commission Nationale de l'Informatique et des libertés (CNIL)**

Online: <https://www.cnil.fr/en/contact-cnil>

By phone: +33 (0)1.53.73.22.22

By post: Commission Nationale de l'Informatique et des Libertés, 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, France.

#### **US: U.S. Federal Trade Commission**

Online: <https://www.ftc.gov/contact>

By phone: (202) 326-2222

By post: Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580

#### **Australia: Office of the Australian Information Commissioner**





Online: <https://www.oaic.gov.au/about-us/contact-us/>

By phone: From within Australia: 1300 363 992

From outwith Australia: +61 2 9284 9749

By post: oGPO Box 5218, Sydney, NSW 2001 or Office of the Australian Information Commissioner, Level 3, 175 Pitt Street, Sydney NSW 2000

### **Malaysia Personal Data Protection Commissioner**

Online: <http://www.pdp.gov.my/index.php/en/hubungi-kami/permohonan-mendapatkan-maklumat-lanjut>

By phone: 03-8000 8000

By post: Jabatan Perlindungan Data Peribadi (JPDP), Aras 6, Kompleks Kementerian Komunikasi dan Multimedia, Lot 4G9, Persiaran Perdana, Presint 4, Pusat Pentadbiran Kerajaan Persekutuan, 62100 Putrajaya, Malaysia

### **Legal Information**

- **City Facilities Management Holdings Limited**, a limited liability company (incorporation no: [SC199503]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **City Facilities Management Holdings (UK) Limited**, a limited liability company (incorporation no: [SC148945]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **City Facilities Management (UK) Limited**, a limited liability company (incorporation no: [SC092623]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G50US, Scotland, UK
- **City Facilities Management (Distribution) Limited**, a limited liability company (incorporation no: [SC372968]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **City Facilities Management (NI) Limited**, a limited liability company (incorporation no: [NI065640]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G50US, Scotland, UK
- **City Facilities Management Limited**, a limited liability company (incorporation no: [SC287679]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **CBES Limited**, a limited liability company (incorporation no: [SC288763]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G50US, Scotland, UK
- **City Refrigeration (UK) Limited**, a limited liability company (incorporation no: [SC161511]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **Maintenance Management Limited**, a limited liability company (incorporation no: [SC04274143]) having its registered office at Apollo House, 6 Bramley Road Mount Farm, Milton Keynes, Bucks, MK1 1PT, England, UK
- **LESPRIT Limited**, a limited liability company (incorporation no: [SC08020588]) having its registered office at Apollo House, 6 Bramley Road Mount Farm, Milton Keynes, Bucks, MK1 1PT, England, UK



## **Cookies Policy:**

When you view CITY's Site, CITY may also use cookies, web beacons, pixel tags, and other technologies ("Cookies") to keep records, store your preferences, improve our advertising, and collect certain non-identifying information about your interactions with our Site, like log data and device data. Cookies can help us in many ways, for example, by allowing us to better understand how you use our Site, to tailor our Site to better match your interests, to troubleshoot and diagnose any problems or issues you may be having, and to otherwise administer and improve the quality of our Site. Cookies also help you to smoothly navigate our Site.

### ***What is a cookie?***

Cookies are small text files that are stored on your computer or mobile device. They are widely used in order to make websites work, or work in a better, more efficient way. They can do this because websites can read and write these files, enabling them to recognize you and remember important information that will make your use of a website more convenient (e.g. by remembering your user preferences).

### ***What cookies do we use?***

- **Performance Cookies.** Performance cookies, which are sometimes called analytics cookies, collect information about your use of this Site and enable us to improve the way it works. For example, performance cookies show us which are the most frequently visited pages on the Site, allow us to see the overall patterns of usage on the Site, help us record any difficulties you have with the Site and show us whether our advertising is effective or not.
- **Functionality Cookies.** In some circumstances, we may use functionality cookies. Functionality cookies allow us to remember the choices you make on our Site and to provide enhanced and more personalized features, such as customizing a certain webpage, remembering if we have asked you to participate in a promotion and for other services you request, like watching a video or commenting on a blog. All of these features help us to improve your visit to the Site.

### ***How do I control cookies?***

You may configure how your browser and mobile device handles Cookies by adjusting its privacy and security settings. Browsers and mobile devices are different, so refer to instructions related to your browser and device to learn about cookie-related and other privacy and security settings that may be available. While you may choose to adjust, block or not allow the use of Cookies, doing so may impair your use of our Site.

Some web browsers may transmit "Do Not Track" ("DNT") signals to the Site and other online services with which the browser communicates. There is no standard that governs what, if anything, websites should do when they receive these signals. Currently, we do not alter our data collection and use practices in response to DNT signals. If and when a standard for responding is established, we may revisit our Privacy Policy on responding to these signals. CITY does not knowingly allow other parties to collect personal information from users on our Site.