

CAMDEN MARKET PRIVACY POLICY

OVERVIEW

(A) Who we are:

We are Camden Market Management Company Limited.

We own and run Camden Market and other iconic real estate in the area, allowing a range of diverse traders to sell to a wide spectrum of visitors and, in some cases, to provide residential real estate assets to tenants (our “Services”).

We are based in England. Our company number is 09307488 and our registered office is at 54–56 Camden Lock Place, London, United Kingdom, NW1 8AF.

All references in this policy to “Camden Market”, “our”, “us” or “we” refer to Camden Market Management Company Limited, or our group companies and suppliers which provide services to us, as appropriate. All references in this policy to our “Website” are to the websites owned by Camden Market at www.camdenmarket.com and www.hawleywharfcamden.com

(B) Our values and what this policy is for: We value your privacy and want to be accountable and fair to you as well as transparent with you in the way that we collect and use your personal information. We also want you to know your rights in relation to your information which you can find [here](#).

In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you.

We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

If you have any feedback on this privacy policy, please let us know using our contact details in section 12.

(C) Who this policy applies to: This policy applies to:

1. Visitors to our Website and people who contact us with enquiries
2. Visitors to our markets and buildings
3. Traders/tenants or prospective traders/tenants and
4. Our suppliers and employees of our suppliers

Depending on our relationship, we will collect and use your information in different ways.

(D) What this policy contains: This privacy policy describes the following important topics relating to your information

1. How we obtain your personal information
2. Collection of your personal information and how we use it
3. Our legal basis for using your personal information
4. How and why we share your personal information
5. How long we store your personal information
6. Your rights
7. Marketing
8. Where we may transfer your personal information
9. Risks and how we keep your personal information secure
10. Links to other websites
11. Changes to this privacy policy and
12. Further questions and how to make a complaint

(E) Your rights to object: You have various rights in respect of our use of your personal information as set out in section 6. Two key rights are that you may:

1. ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose; and
2. ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person’s, legitimate interest.

You can find out more information in section 6.

(F) What you need to do and your confirmation to us: Please read this privacy policy carefully to understand how we handle your personal information.

THE DETAIL

1. How we obtain your personal information

1.1 You may provide us with your personal information voluntarily. However, we may also receive information about you from third parties such as market traders, our suppliers, contractors and consultants at our group companies, market research companies, your colleagues and business contacts, public websites, social media platforms with whom you have an account and public agencies, which we refer to as “third party sources” or “suppliers” throughout this policy.

1.2 You may give us personal information about yourself by using the online forms provided on our Website, when making a purchase with a trader, when connecting to WiFi or by contacting us by phone, email or other means. This includes, for example, where you provide your personal information to us in order to receive information or Services from us. If you or your employer are a supplier, you or they may also give us personal information about yourself when offering or providing services to us.

2. Collection of your personal information and how we use it

Please go to the section or sections below that best describes our relationship with you to find out the information that we collect about you and how we use this information. We refer to this as “personal information” throughout this policy.

2.1 Visitors to our Website and people who contact us with enquiries

(a) What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) if you contact us with an enquiry:
 - (A) your first and last name;
 - (B) your email address;
 - (C) your telephone number;
 - (D) your address;
 - (E) your enquiry and/or general information about your interest in our Services;
 - (F) information provided when you correspond with us; and
 - (G) information about your business;
- (ii) any updates to information provided to us;
- (iii) personal information we collect about you or that we obtain from our third party sources;
- (iv) the following information created and recorded automatically when you visit our Website, download our content or subscribe to our blog:
 - (A) **Technical information.** This includes: the Internet protocol (IP) address used to connect your computer to the internet address; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our Website, to measure the efficiency of our systems and to undertake an analysis on the locations from which people access our webpages; and
 - (B) **Information about your visit and your behaviour on our Website** (for example, the pages that you click on). This may include the website you visit before and after visiting our Website (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads. We use this personal information to undertake an internal analysis on the age, gender, interests and habit of which people access our webpages, where such data is available.

b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to allow you to access and use our Website;
- (ii) to receive enquiries from you through the Website;
- (iii) to respond to enquiries, for instance regarding filming, event space hire, trading at our markets and general enquiries about our markets or other properties such as opening hours and lost property;
- (iv) for improvement and maintenance of our Website and to provide technical support for our Website;
- (v) to ensure the security of our Website;
- (vi) to recognise you when you return to our Website, to store information about your preferences, and to allow us to customise our Website according to your individual interests; and
- (vii) to evaluate your visit to the Website and prepare reports or compile statistics to understand the type of people who use our Website, how they use our Website and to make our Website more intuitive. Such details will be anonymised as far as reasonably possible and you will not be identifiable from the information collected.

Please see sections 2.5 and 2.6 for more details about how we use your personal information.

(c) A word about cookies

- (i) Some pages on our Website use cookies, which are small files placed on your internet browser when you visit our Website. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.
- (ii) Where we use cookies on our Website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our Website or to use all the functionality provided through our Website.
- (iii) For detailed information on the cookies we use and the purposes for which we use them, please refer to our cookies policy [here](#).

2.2 **Visitors to our markets and buildings**

(a) What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your first and last name;
- (ii) your email address;
- (iii) your home or business address;
- (iv) your telephone number;
- (v) general information about your interest in our Services;
- (vi) your Facebook profile details;
- (vii) your MAC address;
- (viii) CCTV recordings;
- (ix) your image and likeness, in the form of photos and film recordings;
- (x) information provided when you correspond with us;
- (xi) any updates to information provided to us;
- (xii) personal information we collect about you or that we obtain from our third party sources, including data about your purchases from traders at our markets;
- (xiii) information about your marketing preferences; and
- (xiv) the following information created and recorded automatically when you connect to the public WiFi in our markets:
 - (A) **Technical information.** This includes: the Internet protocol (IP) address used to connect your device to the WiFi; the files requested; browser type and version; internet service provider; location (where enabled on your device) and device information (including device type).
 - (B) **Information about your visit and your behaviour on our Website** (for example, the pages that you click on). This may include the websites you visit when connected to the WiFi (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), location data (where enabled on your device), language and weblogs.

(b) How we use your personal information

We will collect, use and store the personal information listed above as follows:

- (i) to respond to your enquiries and communicate with you;
- (ii) to provide you with any Services that you request;
- (iii) to understand footfall and flows of people through our markets and buildings;
- (iv) to understand transaction trends across our markets and buildings;
- (v) to advertise our markets or traders within our markets, including on social media, on our Website and in the press;
- (vi) to carry out statistical analysis and market research on people who may be interested in our Services;
- (vii) to ensure your safety and security and that of others, by the use of CCTV; and
- (viii) if you have provided a personal email address and consented or, if it is in our legitimate interests (and we are lawfully permitted to rely on this), for marketing purposes, to contact you (including by email, SMS or post) with information about our products and Services which either you request, or which we feel will be of interest to you (including newsletters).

Please see sections 2.5 and 2.6 for more details about how we use your personal information.

- (c) Source of personal information. We may receive some of your personal information from third parties, such as traders who you make purchases with or from our third party service providers who look after our WiFi network.

Traders/tenants or prospective traders/tenants**(a) What personal information we collect about you**

We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your first and last name;
- (ii) your company/trading name;
- (iii) your email address;
- (iv) your telephone number;
- (v) your address
- (vi) your job title;
- (vii) your bank/payment details;
- (viii) your Facebook profile details;
- (ix) a copy of your passport or other identification document;
- (x) your MAC address;
- (xi) CCTV recordings;
- (xii) your image and likeness, in the form of photos and film recordings;
- (xiii) information about your interest in our Services;
- (xiv) details about how you use our Services, including details of your tenancy/licence;
- (xv) sales data;
- (xvi) information provided when you correspond with us;
- (xvii) any updates to information provided to us;
- (xviii) personal information we collect about you or that we obtain from our third party sources;
- (xix) information you provide to help us provide you with improved Services, for example if we ask you to fill in a survey or questionnaire; and
- (xx) information about your marketing preferences.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to provide you with our Services, including your tenancy;
- (ii) to deal with any enquiries you have about our Services or your tenancy (or potential tenancy);
- (iii) to provide support for any issues you might have with our Services, and to improve our Services;
- (iv) to send you certain communications (including by email) about our Services such as service announcements and operational messages (for example, about down time or maintenance);
- (v) to ensure your safety and security and that of others, by the use of CCTV;
- (vi) to advertise our markets or traders within our markets, including on social media, on our Website and in the press;
- (vii) to carry out statistical analysis and market research on people who may be interested in our Services;
- (viii) to understand transaction trends across our markets;
- (ix) with your prior consent, to post a testimonial to our Website;
- (x) for KYC purposes; and
- (xi) if you have provided a personal email address and consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you (including by email or post) with information about our Services which either you request, or which we feel will be of interest to you (including newsletters).

Please see sections 2.5 and 2.6 for more details about how we use your personal information.

(c) Information we need to provide Services to you. We need certain types of personal information so that we can provide Services to you and perform contractual and other legal and regulatory obligations that we have. If you do not provide us with such personal information, or if you ask us to delete it, you may no longer be able to access our Services.

(d) Source of personal information. We may receive some of your personal information from third parties, such as property agents/brokers, existing Camden Market traders, your colleagues or business contacts that may feel our Services are relevant to you.

Our suppliers and employees of our suppliers**(a) What personal information we collect about you**

We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your first and last name;
- (ii) company contact information (phone number, postal address, and email address);

- (iii) your job title;
- (iv) information provided when you correspond with us;
- (v) any updates to information provided to us;
- (vi) if you attend our buildings, CCTV recordings; and
- (vii) personal information we collect about you from third party sources such as LinkedIn.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to enable us to receive and manage services from you (including supplier due diligence, payment and expense reporting and financial audits);
- (ii) to deal with enquiries from you;
- (iii) for health and safety records and management; and
- (iv) for CCTV monitoring and other means of ensuring security of company facilities.

Please see sections 2.5 and 2.6 for more details about how we use your personal information.

(c) Source of personal information. We may receive some of your personal information from third party sources, such as your employer or your employer's company website. We may also collect this personal information from publicly-available sources, such as LinkedIn.

(d) Information we need to provide Services to you. Please note that we need certain types of personal information so that you or your employer can provide services to us. If you do not provide us with such personal information, or if you or your employer ask us to delete it, you may no longer be able to provide services to us.

2.5 Whatever our relationship with you is, we may also collect, use and store your personal information for the following additional reasons:

- (a) to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
- (b) for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;
- (c) to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so; and
- (d) to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

2.6 Further processing

Before we use your personal information for purposes which fall outside those set out in this section 2, we will take steps to consider whether our proposed new use is compatible with these purposes. Please contact us using the details in section 12 if you want further information on these steps.

3. **Legal basis for use of your personal information**

3.1 We consider that the legal bases for using your personal information as set out in this privacy policy are as follows:

- (a) our use of your personal information is necessary to perform our obligations under any contract with you (for example, to provide Services to you, to enter into a tenancy agreement or licence if you are a trader, to comply with the terms of use of our Website which you accept by browsing our Website and/or to comply with our contract to provide services to or receive services from you or your employer); or
- (b) our use of your personal information is necessary for complying with our legal obligations; or
- (c) where neither (a) nor (b) apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our Website). Our legitimate interests are to:
 - (i) run, grow and develop our business;
 - (ii) operate our Website;
 - (iii) select and interact with appropriately skilled and qualified suppliers;
 - (iv) marketing, market research and business development;
 - (v) provide efficient and effective Services to traders and visitors and make and receive payment for such Services;
 - (vi) place, track and ensure fulfilment of orders with our suppliers;
 - (vii) ensure the security of our markets, buildings and personnel; and
 - (viii) for internal group administrative purposes.

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by using the contact details at section 12 or

- (d) we will process your personal information in some cases on the basis of your consent, including but not limited to:
- (i) where you provide a client testimonial to us; and
 - (ii) where you have provided a personal email address or mobile phone number to us and we request your consent to use these details for marketing purposes.

If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at info@camdenmarket.com and we will stop doing so.

4. **How and why we share your personal information with others**

4.1 We may share your personal information with our group companies where it is in our legitimate interests to do so for internal administrative purposes (for example, ensuring consistent and coherent delivery of our Services to our customers, corporate strategy, compliance, auditing and monitoring, research and development and quality assurance).

4.2 We will share your personal information with the following third parties or categories of third parties:

- (a) our service providers and sub-contractors, including but not limited to payment processors, suppliers of technical, software and support services, insurers, legal advisers, logistic providers, and cloud service providers;
- (b) any legal, regulatory or governmental body that we are required to disclose information to, credit control and debt collection agencies;
- (c) companies that assist us in our marketing, advertising, promotional, real estate management/agency and public relations activities;
- (d) group companies, who may have access to shared databases;
- (e) traders in our markets; and
- (f) analytics and search engine providers that assist us in the improvement and optimisation of our Website.

4.3 Any third parties with whom we share your personal information are limited by law in their ability to use your personal information for any purpose other than to provide services for us. In addition, we take steps to ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

4.4 We will also disclose your personal information to third parties:

- (a) where it is in our legitimate interests to do so to run, grow and develop our business, such as:
 - (i) if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets; and
 - (ii) if substantially all of Camden Market's or any of its affiliates' assets are acquired by a third party, in which case personal information held by Camden Market will be one of the transferred assets;
- (b) if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation, any lawful request from government, regulator or law enforcement officials or prevent illegal activity;
- (c) in order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party or to prevent any illegal activity; or
- (d) to protect the rights, property or safety of Camden Market, our staff, our customers or other persons.

4.5 We may also disclose and use anonymised, aggregated reporting and statistics about users of our Website, our products and Services and use of our markets and buildings by visitors and traders for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.

4.6 Except as expressly set out above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.

5. **How long we store your personal information**

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time for which we retain personal information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

6. **Your rights**

6.1 You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us at any time via email at camdenconnect@camdenmarket.com if you are a tenant of our markets or info@camdenmarket.com if you are not a tenant of our markets. You have the following rights:

- (a) **Right of access.** You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the European Economic Area ("EEA").

(b) **Right to update your information.** You have a right to request an update to any of your personal information which is out of date or incorrect.

(c) **Right delete your information.** You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in section 12.

We will pass your request on to other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are using the contact details in section 12.

(d) **Right to restrict use of your information:** You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in section 12.

We will pass your request on to other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are using the contract details in section 12.

(e) **Right to stop marketing:** You have a right to ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.

(f) **Right to data portability:** You have a right to ask us to provide your personal information to a third party provider of services.

This right only applies where we use your personal information on the basis of your consent or performance of a contract and where our use of your information is carried out by automated means.

(g) **Right to object.** You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

6.2 We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

6.3 If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

7. **Marketing**

7.1 We will collect and use your personal information for undertaking marketing by email.

7.2 We will send you certain marketing communications (including electronic marketing communications to existing customers), which may include content offers, surveys event details, where it is in our legitimate interests to do so for marketing and business development purposes.

7.3 However, we will always obtain your consent to direct marketing communications where we are required to do so by law (for example, if you have provided a personal email address to us) and if we intend to disclose your personal information to any third party for such marketing.

7.4 If you wish to stop receiving marketing communications, you can do this by clicking the "unsubscribe" link at the bottom of any email from us, or contact us by email at camdencard@camdenmarket.com or info@camdenmarket.com.

8. **Where we may transfer your personal information**

8.1 Your personal information may be used, stored and/or accessed by staff operating outside the EEA working for us, other members of our group or suppliers. Further details on to whom your personal information may be disclosed are set out in section 4.

8.2 If we provide any personal information about you to any such non-EEA members of our group or suppliers, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this privacy policy. These measures may include the following permitted in Articles 45, 46 and 49 of the General Data Protection Regulation:

(a) in the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>);

(b) in the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them; or

(c) the transfer is necessary for the performance of a contract with you (e.g., to implement a payment instruction).

8.3 Further details on the steps we take to protect your personal information in these cases is available from us on request by contacting us by email at info@camdenmarket.com at any time.

9. **Risks and how we keep your personal information secure**

9.1 The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public information that you would prefer to keep private.

9.2 For this reason, we are committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures. These include, ensuring electronic data is held on secure systems, only giving certain personnel access to certain databases or datasets and confidential disposal mechanisms for physical documents.

9.3 In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information between you and us over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information while it is transmitted in this way and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.

9.4 Where we have given you (or where you have chosen) a password which enables you to access an online account (for example a Practi or iZettle account), you are responsible for keeping this password confidential. We require you not to share a password with anyone.

10. **Social media and links to other websites**

Our Website:

- (a) includes social media features, such as the Facebook, Twitter, Instagram or YouTube “sharing” or “follow” buttons; and
- (b) may contain links and pages to other websites operated by third parties.

Please note that this privacy policy applies only to the personal information that we collect through our Website and Services and we cannot be responsible for personal information that third parties may collect, store and use through third party features and websites. You should always read the privacy policy of each website you visit carefully.

11. **Changes to our privacy policy**

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by post or email. Please check back frequently to see any updates or changes to our privacy policy.

12. **Further questions and how to make a complaint**

12.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact info@camdenmarket.com. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.

12.2 You may also make a complaint to the Information Commissioner’s Office, or (in certain circumstances) the data protection regulator in the country where you usually live or work and where an alleged infringement has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

The practices described in this privacy policy statement are current as of 23 November 2018.