

## Privacy Notice

The Bedford Estates handles a variety of personal data during its interaction with individuals. This notice explains who we are, how we handle your personal information, how the law protects you and what your privacy rights are. The notice is part of our suite of privacy notices; further detailed notices are available for employees, tenants and golf club members. Our privacy notices are regularly updated to reflect changes in privacy law, our activities or practices (updated September 2023).

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## Who We Are

The Bedford Estates is the generic name under which the following businesses operate:



**THE BEDFORD ESTATES**

Our London property office is managed by Bedford Estates Bloomsbury Limited, 29a Montague Street, London, WC1B 5BL (company no. 10250020; ICO registration ZX307121). [www.bedfordestates.com](http://www.bedfordestates.com)



**THE BEDFORD ESTATES**

The Woburn Estate includes our property office for Bedfordshire, the deer farm, forestry operation & support functions (including personnel & security). These are managed by the 1987 Settlement, The Bedford Estates, Bedford Office, Woburn, Bedfordshire, MK17 9PQ (company no. 03743508; ICO registration ZA059026). [www.woburn.co.uk](http://www.woburn.co.uk)



Our leisure businesses in Woburn, Bedfordshire are part of Woburn Enterprises Partnership. These are: Woburn Abbey & Gardens, Woburn Safari Park, Woburn Golf Club, and The Sculpture Gallery. The

partnership is managed by Woburn Enterprises Limited, The Bedford Office, Woburn, Milton Keynes, Bedfordshire, MK17 9PQ (company no. 00966094; ICO registration ZA307399).



### **Woburn Farms Partnership**

Our farming operation is managed by R&A Farms, The Bedford Estates, Bedford Office, Woburn, Bedfordshire, MK17 9PQ (company no. 02748881; ICO registration ZA059026).

### **Questions Concerns and Rights**

The data protection laws give you certain rights. You have the right to:

- rectify inaccurate/incomplete personal data
- change your marketing & contact preferences
- ask us for copies of your personal data

In certain circumstances you also have the right to ask that we:

- erase your personal data (though there may be legal or other reasons which compel us to continue to keep your data)
- restrict the processing of your personal data
- transfer a copy of your data to another company

In the first instance please direct any rights requests, questions and concerns you have about how we collect, store and use personal data to the business holding your data. If the business cannot resolve the issue please contact the Data Protection Coordinator: Data Protection, The Bedford Estates, Bedford Office Woburn MK17 tel.: 01525 290 333 email: [data.protection@woburn.co.uk](mailto:data.protection@woburn.co.uk)

If we are still unable to resolve the matter you have the right to lodge a complaint with the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF helpline: 0303 123 1113 website: <https://www.ico.org.uk>

### **Types of Personal Data**

We use different kinds of personal information, here are examples of how we group them together.

Type of information	Description
Contact	Where you live & how to contact you.
Transactional	Details about payments to your account with us.
Financial	Financial position, status & history.
Communications	What we learn about you from letters, emails, conversations between us and social media posts.
Contractual	Details about products or services we provide to you or are provide to us.
Usage Data	Data about how you use our products and services.
Socio-demographic	Details about your work or profession, nationality & education.

Documentary data	Details about you that are stored in documents in different formats, or copies of them. This could be things like your passport, driver's license or birth certificate.
Social Relationships	Your family or other relationships e.g. next of kin
Open data and public records	Details about you that are in public records such as Electoral Register and information about you that is openly available on the internet.
Location, behavioural & technical	The address where you connect a computer to the internet; details about how you use our products and services; details on the devices and technology you use and traffic information when connection to our Wi-Fi.
Consents	Your marketing and contact preferences. If you have agreed we can contact you for marketing purposes we may send you communications relating to products and services which we think will be of interest and relevance to you. We can do this by monitoring the browsing and online shopping habits of customers and providing them with information on products they have viewed and related products.
Images & Audio	When you visit our premises to control access; for safety and security and for animal welfare. [Note: audio recording is strictly limited].

## Where We Collect Personal Information From

Most personal information is provided to us directly by you when you:

- apply for a job, rent a property, become a golf club member or an annual pass holder etc.
- talk to us on the phone or in our business offices
- correspond with us
- make insurance claims
- complete surveys
- if you take part in our events or visit our businesses
- ask us to send you marketing communications
- post on social media
- make payments
- use our websites or portals (e.g. tenants)
- take part in financial reviews and interviews

We also gather profile and usage data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software; through our surveillance equipment (CCTV, ANPR and very occasionally, body worn cameras); and from our building access (fob) system.

Data is also provided to us by third parties working on our behalf including property professionals such as estate agents, chartered surveyors, planning consultants, land agents, building contractors, solicitors, managing agents for our properties.

- utilities companies
- credit reference agencies
- debt collection agencies

- insurers
- local authorities
- solicitors working on your behalf to extend leasehold tenures
- public information sources such as Companies House

Occasionally, we buy marketing lists but only where the company supplying the list can prove such lists are data protection compliant.

## Why We Collect Personal Data

We are only permitted to use personal information if we have an acceptable reason to do so. This includes sharing it outside The Bedford Estates. The law says we must have one or more of these reasons:

Reason	What you need to know
To fulfil a <i>contract</i> we have with you	For example, when you become a tenant; book an event; buy a ticket; join our golf club; work with us.  Failing to give certain information, when requested, may prevent us entering into a contract with you.
When it is our <i>legal duty</i> .	For instance meeting our obligations under Health & Safety and other legislation.
When it is in our <i>legitimate interest</i> .	When we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what it is.  Examples of our <i>legitimate interests</i> are listed below.
When you <i>consent</i> to it.	We only send marketing communications to individuals who have consented to receive them. You can withdraw your <i>consent</i> and change your communication preferences at any time without any impact on a contract you have with us.  Note: there are a few circumstances where we rely upon <i>legitimate interests</i> for marketing but we will always offer an opportunity to opt out of receiving them.

Your data is only used for the reason/s we told you when it was collected, unless we consider that we need to use it for another reason which is compatible with the original purpose. Your personal data may be used without your knowledge or consent, where this is allowable by law.

### Examples of our legitimate interests:

- complying with regulations that apply to us
- being efficient about how we fulfil our legal and contractual duties
- managing our facilities
- making decisions about continued memberships and tenancies, arranging termination and exercising our rights set out in agreements or contracts and dealing with complaints
- efficient and proper estate and business management, planning, communications, keeping records up to date, benchmarking, accounting and auditing

- responding to communications sent to us, incl. social media posts; informing you of important changes to our business or policies; reviewing and improving the performance of our systems, processes & employees (including training)
- obtaining legal advice
- maintaining animal health and welfare
- to monitor and protect people and property for security purposes
- effective resource management
- delivering staff benefits
- notify/invite our community to events
- to decide whether you can provide goods or services to The Bedford Estates and take part in hosted events, and to enable the same
- administering competition entries
- to support the local community

### Archiving

The Bedford Estates has a rich archival heritage. For future research purposes which are in the public interest we store a limited amount of personal details permanently but please bear in mind that these records remain confidential for 100 years. Here are some examples of what we keep forever:

- your image if you have agreed to appear in publicity/print.
- your name, dates of membership and reason for resignation if you are a Golf Club member
- your name and length of agreement if you are a tenant
- letters of thanks and gift presentation information to employees

Further information can be found in the detailed privacy notices available from our businesses.

### Sharing Your Personal Data

Who we share your personal data with	What you need to know
Within the Bedford Estates	We share your information with our employees where this is necessary. For example, for administrative purposes (accounts processing, employee management, delivering our contract with you etc.) and for the purposes of estate management and governance.
With third parties	<p>We have a number of trusted partners with whom we share your data to deliver our services &amp; undertake services on our behalf. Below is an example of some activities carried out by third-parties service providers:</p> <ul style="list-style-type: none"> <li>• web hosting and delivery of marketing communications</li> <li>• IT service providers for the purposes of operating our business, data management &amp; support services and security</li> <li>• property letting &amp; security</li> <li>• providing professional advice</li> <li>• undertaking compliance requirements</li> <li>• research for the purposes of planning applications</li> </ul>

	<ul style="list-style-type: none"> <li>• undertaking maintenance &amp; repair to our properties</li> <li>• debt collection (debt &amp; tracing services)</li> <li>• hosting &amp; facilitating the hosting of events</li> <li>• undertaking satisfaction surveys</li> </ul>
Obligation	<p>We will share your personal information with third parties where we have a statutory obligation e.g.</p> <ul style="list-style-type: none"> <li>• local authorities for business rate assessments, HMO registration etc.</li> <li>• insurance claim information may go on to a register of claims shared with other insurers</li> <li>• HM Revenue &amp; Customs, regulators and other authorities</li> <li>• Tenant Deposit Scheme</li> <li>• The Direct Debit Scheme</li> <li>• insurance claim information may go on to a register of claims shared with other insurers</li> </ul>
At your request	<p>We share your data with companies you have asked us to share your data with. This may include banks, mortgage lenders, prospective employers &amp; organisations to whom employees are seconded.</p>
Exceptional circumstances	<p>In exceptional circumstances where we believe that the disclosure is:</p> <ul style="list-style-type: none"> <li>• Required by the law, to comply with judicial proceedings, court orders or legal or regulatory proceedings and fraud prevention.</li> <li>• Necessary to protect the safety of our employer, employees, yourself, our property or the public.</li> <li>• Necessary for the prevention or detection of crime including exchanging information with other companies or organisations for the purposes of fraud prevention and credit risk reduction.</li> </ul> <p>Occasionally we disclose personal data to authorities such as the police and emergency services where they need it to pursue legal claims or to protect your interest, or someone else's or where you are not capable of giving consent or where the information has already been made public by you. If we do, we make sure we are proportionate in the amount of data disclosed and have procedures in place to keep it secure.</p>

## Data Security

We take all steps reasonably necessary to make sure that all personal information is securely handled in line with this notice. As well as our internal policies and procedures, we train staff in data handling. Access to your personal information is restricted and only used for the purposes for which we collected it.

All information you provide to us is stored securely, both physically and on servers. We have contracts in place with third parties storing data on our behalf outside the UK (but with the EEA). In exceptional circumstance where data is transferred outside the EEA appropriate protections are arranged.

## Special Category Data Handling

Certain data requires special handling because if it disclosed accidentally it could have a harmful effect on you. This includes sensitive data (race & ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health, sex life or sexual orientation), criminal data and children's data. As such, we will only use this data with your consent unless it is in your vital interests (threat to your life), it is in our legitimate interests, where there is a legal obligation or a contractual commitment. Procedures are in place to handle this data appropriately. Some examples of where we use special category data:

- Food requirements for catering (potential health data)
- Medical information of participants of golf and safari park events (health data)
- To support your recovery at work after an absence (health data)
- Race/ethnic origin (equal opportunities monitoring)
- Disclosure and Barring Service checks (criminal data)

## Website & Cookies

The consent of a parent or guardian is required for children under the age of 13 who wish to use the limited online services available to them.

### Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies we use and why. We have tried to cover all cookies in the table that we or our technology partners use. Please be aware that there may sometimes be a delay in updating this list. If you do notice any discrepancies, please be sure to let us know.

#### Across all our domains

Cookie	Description	Type
_fbp	Facebook sets this cookie to display advertisements when either on Facebook or on a digital platform powered by Facebook advertising after visiting the website.	Analytics
_ga	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.	Analytics
_ga_*	Google Analytics sets this cookie to store and count page views.	Analytics
_gat_UA-*	Google Analytics sets this cookie for user behaviour tracking.	Analytics
_gcl_au	Google Tag Manager sets the cookie to experiment advertisement efficiency of websites using their services.	Analytics
_gid	Google Analytics sets this cookie to store information on how visitors use a website while also creating an analytics report of the website's performance. Some of the collected data includes the number of visitors, their source, and the pages they visit anonymously.	Analytics

ai_session	This is a unique anonymous session identifier cookie set by Microsoft Application Insights software to gather statistical usage and telemetry data for apps built on the Azure cloud platform.	Analytics
ai_user	Microsoft Azure sets this cookie as a unique user identifier cookie, enabling counting of the number of users accessing the application over time.	Advertisement
ARRAffinity	ARRAffinity cookie is set by Azure app service, and allows the service to choose the right instance established by a user to deliver subsequent requests made by that user.	Necessary
ARRAffinitySameSite	This cookie is set by Windows Azure cloud, and is used for load balancing to make sure the visitor page requests are routed to the same server in any browsing session.	Necessary
ASP.NET_SessionId	Issued by Microsoft's ASP.NET Application, this cookie stores session data during a user's website visit.	Necessary
CookieControl	This cookie is set by the Civic UK Cookie Control and is used to remember a user's choice of cookies on the website.	Necessary
TiPMix	The TiPMix cookie is set by Azure to determine which web server the users must be directed to.	Necessary
x-ms-routing-name	Azure sets this cookie for routing production traffic by specifying the production slot.	Necessary

#### WoburnSafari.co.uk

Cookie	Description	Type
_hjAbsoluteSessionInProgress	Hotjar sets this cookie to detect a user's first pageview session, which is a True/False flag set by the cookie.	Functional
_hjFirstSeen	Hotjar sets this cookie to identify a new user's first session. It stores the true/false value, indicating whether it was the first time Hotjar saw this user.	Analytics
_hjIncludedInSessionSample_3414506	Hotjar sets this cookie to ensure data from subsequent visits to the same site is attributed to the same user ID, which persists in the Hotjar User ID, which is unique to that site.	Analytics
_hjSession_*	Hotjar sets this cookie to ensure data from subsequent visits to the same site is attributed to the same user ID, which persists in the Hotjar User ID, which is unique to that site.	Analytics
_hjSessionUser_*	Hotjar sets this cookie to ensure data from subsequent visits to the same site is attributed to the same user ID, which persists in the Hotjar User ID, which is unique to that site.	Analytics
IDE	Google DoubleClick IDE cookies store information about how the user uses the website to present them with relevant ads according to the user profile.	Advertisement
test_cookie	doubleclick.net sets this cookie to determine if the user's browser supports cookies.	Advertisement

#### WoburnGolf.co.uk and BedfordEstates.com

Cookie	Description	Type
__cf_bm	Cloudflare set the cookie to support Cloudflare Bot Management.	Functional
aka_debug	Vimeo sets this cookie which is essential for the website to play video functionality.	Functional
vuid	Vimeo installs this cookie to collect tracking information by setting a unique ID to embed videos on the website.	Analytics



Most web browsers allow some control of most cookies through the browser settings. If you do not wish to allow the use of cookies and still wish to browse the website, you can turn off cookies within your browser settings. For information on how to control or delete cookies set by the Woburn website, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

Please note that if you do opt to reject cookies, any personalised functionality of this website will not operate correctly. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

### **Social Cookies**

Our website is integrated with the following social platforms which independently may set cookies on your computer:

- Facebook
- Instagram
- LinkedIn
- X (formally Twitter)
- Pinterest
- Vimeo

Please note that we do not have any control over how the information in these cookies is used nor do we have access to it. Please refer to the cookie policies of the relevant provider for more information.

### **YouTube Cookies**

We embed videos from our official YouTube channel using YouTube's privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode. To find out more please [visit YouTube's embedding videos information page](#).

### **Website User Experience Cookies**

We use [Hotjar](#) to better understand our users' needs. This enables us to optimize the service we offer you and improve your experience. Hotjar uses cookies and other technologies to collect data about user behaviour and the device used to visit our websites.

The following data is collected: a device's IP address (which is captured and stored in anonymized form, device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website, how much time you spend on which pages, which links you choose to click, the completion of forms, what our users do and do not like and judging their overall experience on the site.

Hotjar stores this information in a pseudonymized user profile. This means that your personal data is anonymous to us. Neither Hotjar nor The Bedford Estates will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on [this link](#).

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following [this opt-out link](#).

Our websites contain links to other sites, including those of sponsors and advertisers, whose information practices may be different from ours. Sometimes these sites might conduct contests that are promoted on Woburn Enterprises Limited. Visitors should consult these other third party sites' privacy notices, since these sites are not covered by our privacy policy and may follow different procedures.

**Security of Web Data**

We use Internet standard encryption technology ("SSL" or "Secure Socket Layer" technology) to encode personal data that you send to us when placing an enquiry through the Website. To check that you are in a secure area of the Website before sending personal data to us, please check that your browser displays an image of a closed padlock or an unbroken key.

However, please note that whilst we take appropriate technical and organisational measures to safeguard the personal data that you provide to us, no transmission over the Internet can ever be guaranteed secure. Consequently, please note that we cannot guarantee the security of any personal data that you transfer over the Internet to us.