

Calton Privacy Notice

Calton Limited (known as "Calton") is the data controller responsible for processing your personal information. We are committed to protecting your privacy and ensuring you have a positive experience when you interact with us. This privacy notice explains how we collect, use, and protect your personal data in accordance with the Data Protection (Jersey) Law 2018. Calton is registered with the JFSC, Registration Number: 116935 and the JOIC, registration number 57583.

The Data Protection Manager ("DPM")

Calton has appointed a Data Protection Manager who is responsible for overseeing our compliance with data protection law. If you have any questions about how we handle your personal information, or if you wish to exercise your rights, you can contact our DPM at:

- Email: info@calton.je
- Telephone: 01534525252

The Kind of Information We Hold About You

Calton is a property and facilities management company providing services including work carried out at Andium Homes properties in Jersey. To deliver these services and meet our contractual and legal obligations, we collect and process personal information about our clients and service users.

The personal data we collect is limited to what is necessary to provide our services to you and to comply with applicable law. This includes your contact details, information about the work you have requested, and in some cases CCTV footage at our facilities.

How Is Your Personal Information Collected?

We collect your personal information directly from you when you contact us to request our services, or when you provide information to us in connection with work we carry out on your behalf or at your property. This may be through:

- Written enquiries or forms
- Telephone conversations
- Email communication
- In-person meetings or site visits
- CCTV systems at facilities where we operate

We may also receive information about you from third parties, such as Andium Homes or other referring organisations, where they have instructed us to carry out work on their behalf or at their properties.

What Information Do We Collect About You?

The table below sets out the categories of personal information we collect and the purposes for which we use that information:

Category of Personal Data	Purpose of Processing
Name, title, address, telephone number and email address	To identify you, communicate with you about our services, provide quotations, arrange access to properties, deliver services, issue invoices, and maintain records of our business relationship
Details of work required and specifications	To understand your requirements, provide appropriate services, schedule work, track progress, and maintain service records
CCTV footage	To monitor and secure facilities, investigate incidents, protect property and personnel, and comply with security obligations

Special Category Data

Special category data (which includes health information and other sensitive personal data) is not routinely collected by Calton. However, we recognise that you may voluntarily provide us with health or other special category information where this is relevant to the work we carry out for you, for example if you have a health condition that affects access to a property or the work we need to do.

Where you do provide special category data to us, we will process it only with your explicit consent and only for the purpose you have indicated. We will handle such information with appropriate care and in strict confidence. You may withdraw your consent to this processing at any time by contacting our DPM.

How We Will Use Information About You

We process your personal information on the following lawful bases set out in the Data Protection (Jersey) Law 2018:

Contract (Schedule 2 Part 1, Condition A). We process your name, contact details, and details of work required because this is necessary to enter into and perform a contract with you for the supply of our property and facilities management services. For example, we need your address and contact information to arrange site visits, to quote for work, and to deliver services at your property.

Legal Obligation (Schedule 2 Part 1, Condition C). We process personal information to comply with legal and regulatory obligations that apply to our business. This includes data we hold for accounting, tax, and business record purposes, and to comply with health and safety or security legislation.

Legitimate Interests (Schedule 2 Part 1, Condition D). We also process personal information where it is in our legitimate interests to do so, provided that this does not override your rights and freedoms. For example, we may use your contact information to send you important updates about services we provide to you, or to investigate and resolve service issues or complaints.

Consent (Schedule 2 Part 1, Condition E). Where we process personal information on the basis of your explicit consent, we will always make clear to you what we are asking your consent for and why. You are free to withdraw consent at any time.

Public Task (Schedule 2 Part 1, Condition F). To the extent that any processing is carried out in the exercise of a function conferred by law, we will rely on this condition where it applies.

We do not use automated decision-making or profiling to make decisions about you.

Change of Purpose

We will only use your personal information for the purposes stated in this notice, or where those purposes are compatible with the original purpose for which we collected the information.

If we intend to use your information for a materially different purpose than that for which it was originally collected, we will provide you with information about that new purpose before we process your data, and we will seek your consent where required by law.

Data Sharing

Calton shares your personal data with carefully selected third parties (called "processors") who help us deliver our services. These processors act on our instructions and are bound by confidentiality and data protection obligations.

The table below sets out our main processors and describes what they do with your information.

Processor	Description of Processing	Link to Privacy Notice
Propelfwd	Data Protection Advisors	Privacy Notice
SimPro	CRM system for employees and clients	Not publicly available
Microsoft 365	General IT operating system	Privacy Notice
Radius	Tracking system	Privacy Notice
XERO	Accounting software	Privacy Notice

Processor	Description of Processing	Link to Privacy Notice
Ezzy Bills	Invoicing application	Privacy Notice
Trello	Teams project management	Privacy Notice
Google (CCTV)	CCTV system processor	Privacy Notice
G4S	Confidential waste bin processing	Privacy Notice
Aareon QL	Housing management software	Not publicly available
E-gress	Online government receipts accounting system	Privacy Notice
Hot Frog	IT support	Not publicly available
Norman Limited	Management of customer accounts, enquiries, quotations, orders, deliveries, payments and warranty claims	Privacy Notice
Flow Vendor	AI and Automation for Operators in Energy	Privacy Notice

Processor	Description of Processing	Link to Privacy Notice
Bisense	Processing personal data for the development and delivery of virtual reality (VR) technology and related software, including user interaction, movement tracking and haptic feedback, as well as managing enquiries and communications relating to the product and project	Privacy Notice
CookieScan	Cookie compliance and consent management services, including scanning websites for cookies and trackers	Privacy Notice
iPOP Digital	Provision of website design, development and digital marketing services, including client communications, service delivery and related business administration.	Privacy Policy

Your personal data may also be shared with law enforcement, regulatory authorities or other third parties where required by law, or where necessary to protect our rights or the rights of others.

International transfers: Your personal data may be transferred outside Jersey to processors and other recipients located in the United Kingdom, the European Economic Area, or other jurisdictions. Where transfers occur outside Jersey, Calton ensures appropriate safeguards are in place to protect your information in accordance with data protection law.

Data Security

Calton takes data security seriously. We implement technical and organisational measures to protect your personal information against unauthorised access, alteration, disclosure or destruction. These measures include encryption, access controls, staff training and regular security reviews.

However, no system is completely secure. While we work hard to protect your data, we cannot guarantee absolute security. If a security breach occurs that puts your personal information at risk, we will notify you and the Jersey Office of the Information Commissioner without undue delay as required by law.

Data Retention

Calton retains personal information for as long as necessary to fulfil the purposes for which it was collected, including to meet our legal, accounting and reporting obligations, and to defend against any legal claims.

CCTV recordings are retained for thirty days. After that period, recordings are automatically deleted unless we have a specific legal reason to retain them longer.

Where appropriate, we anonymise information so that it can no longer identify you, and such anonymised data may be retained indefinitely.

A detailed Data Retention Schedule setting out how long we keep different categories of personal information is available on request from our Data Protection Manager. Please contact the details provided in the "How to Contact Us" section.

Rights of Access, Correction, Erasure and Restriction

Under the Data Protection (Jersey) Law 2018, you have the following rights in relation to your personal information.

- **Right of access:** You have the right to obtain confirmation as to whether we hold your personal data, and if we do, to request a copy of it together with information about how we use it, who we share it with, and how long we keep it.
- **Right to rectification:** You have the right to request that we correct any personal information we hold about you that is inaccurate or incomplete.
- **Right to erasure:** You have the right to request that we delete your personal information in certain circumstances, for example where it is no longer necessary for the purposes we collected it, or where you withdraw your consent (if consent was the basis for processing).
- **Right to restrict processing:** You have the right to request that we restrict or suspend processing of your personal information in certain circumstances, for example whilst we verify the accuracy of disputed information.
- **Right to data portability:** You have the right to request that we provide your personal information in a structured, commonly used and machine-readable format, and to transmit it to another organisation if technically feasible.
- **Right to object:** You have the right to object to processing of your personal information on the basis of our legitimate interests, and in certain other circumstances.

These rights are not absolute. In some cases we may not be able to comply with a request, for example where we need to retain information for legal or contractual reasons, or where doing so would breach another person's rights. We will explain our reasons if we cannot fulfil your request.

How to Request Your Information

You can exercise any of the rights listed above by submitting a request to Calton. We will respond to your request within **four weeks** of receiving it.

If your request is complex or if you have submitted multiple requests, we may extend the response period by a further **eight weeks** (so up to 12 weeks in total). If we do this, we will inform you within the original four-week period and explain why the extension is necessary.

To submit a request, please use our [Data Rights Portal](#).

Alternatively, you can also email us at info@calton.je or write to us at the address below.

Calton

West Store D, Halcyon House, West Hill, St Helier, JE2 3HB, Jersey.

When you make a request, please provide as much detail as you can about the information you are seeking. This helps us to locate your data quickly and accurately. We may ask you for proof of identity to confirm that you are the person the information relates to.

Right to Withdraw Consent

If Calton is processing your personal information based on your consent, you have the right to withdraw that consent at any time. You can do this by contacting us using the contact details above, or by using our [Data Rights Portal](#).

Withdrawing consent will not affect the lawfulness of any processing we have already done based on your consent before the withdrawal. It will only stop us from processing your information in that way going forwards.

Automated Decision-Making

We do not use automated decision-making or profiling in relation to your personal information.

Changes to this Privacy Notice

Calton may update this privacy notice from time to time to reflect changes in our business, legal requirements or other factors. If we make significant changes, we will notify you by email or by posting a notice on our website. Your continued use of our services after any changes have been made will constitute your acceptance of the updated privacy notice.

We encourage you to review this privacy notice regularly to stay informed about how we handle your personal information.

Complaints

If you are unhappy with how Calton is handling your personal information, please contact us first so that we can try to resolve the issue.

Calton

Data Protection Manager

Email: info@calton.je

Telephone: 01534 525252

Address: West Store D, Halcyon House, West Hill, St Helier, JE2 3HB, Jersey

JOIC Registration Number: 57583

If you are not satisfied with our response, or if you wish to make a complaint about how we handle your data, you have the right to lodge a complaint with the Jersey Office of the Information Commissioner (JOIC), which is the supervisory authority for data protection in Jersey.

Jersey Office of the Information Commissioner

2nd Floor

5 Castle Street

St Helier

Jersey JE2 3BT

Telephone: +44 (0) 1534 716530

Email: enquiries@jerseyoic.je

Website: jerseyoic.org

You also have the right to lodge a complaint with another supervisory authority if you believe a breach of data protection law has occurred. **Last updated:** 18 Septemebrr 2026.