

With all the new rules coming into place shortly, we wish to share with you the information we keep and how we use it....

If you have signed up to a service from us;

- we will have your name and address (for the purpose of communication and contracts)
- We have a contact number (for any communication or any queries etc)We will have your email address (for contact and correspondence)
- If you have not signed up to a service from us but shown an interest in our company then we will have your name, email address and possibly a contact number.

## If you wish to be removed completely from my database please email and let us know.

We don't send many emails - so if you choose to stay on our database it will just mean you can stay easily up to date with any new services and products. Statements & contracts will still be sent via email as normal.

We have Facebook (Relocation Lettings and Property Management Ltd)

We have never passed on details to a third party and never would! So rest assured we take

our security seriously.

Any further questions or queries please just get in touch we would love to hear from you.

Scott & The Team at Relocation Lettings and Property Management

E: <u>info@relocationlettings.com</u>

T: 01216165170 or 07930204587

W: www.relocationlettings.com

Please see our full GDPR Policy below:



General Data Protection Regulation Policy

#### Statement

GDPR stands for General Data Protection Regulation and replaces the previous Data Protection

Directives that were in place. It was approved by the EU Parliament in 2016 and comes into effect on 25th May 2018.

GDPR states that personal data should be 'processed fairly & lawfully' and 'collected for specified, explicit and legitimate purposes' and that individuals data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals. Relocation Lettings and Property Management Ltd is committed to protecting the rights and freedoms of individuals with respect to the processing of individuals; tenants or landlords, visitors and staff personal data.

The Data Protection Act gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

Relocation Lettings and Property Management Ltd is registered with the ICO (Information Commissioners Office) under registration reference:

Copies of the certificates are held at our office.

## **GDPR includes 7 rights for individuals**

1) The right to be informed

Relocation Lettings and Property Management Ltd is a Residential Lettings and Property Management Company and as so, is required to collect and manage certain data.

We collect and process personal data about you when you interact with us and our websites and when you register with us to receive our services. Other than the personal data which you give us (which will usually include, name, address, telephone number, email address, date of birth, credit history, previous addresses, identification) in response to requests from us or other parties to a transaction which you are participating in, information that we collect directly from you includes:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

## Information from third parties

Sometimes, we receive information about you from third parties. In particular:

- Through enquiries and website visits;
- Social Media Companies including Facebook etc when you interact with our brand through these platforms;
- Previous or current landlords for the purpose of referencing;
- Enquiries through property portals when you request further information on a property or request information;
- Financial Advisors, mortgage brokers, lenders and solicitors/conveyancing agents through transactions relating to the service we are providing; and
- Other agents/companies as and when required for purposes which will be disclosed.

# Use of this information, and the legal basis for its use

We process this personal data for the following purposes:

- To fulfil a contract. This includes:
- providing our services including processing information in connection with a property's sale or letting, arrangements for the transfers of funds by or to third parties, end of contract arrangements;
- communicating with you.
- As required by us to conduct our business and pursue our respective legitimate interests, in particular:
- we will each use your information to provide services to you before we have a contract with you (for instance sending potential buyers and tenants property details), and to respond to any comments or complaints you may send us;
- the Company monitors use of our websites and online services, and uses your information to

help us monitor, improve and protect our products, content, services and websites, both online and offline, including as set out in our Cookie policy below;

- the Company uses information you provide to personalise our website, products or services for you, including as set out in our Cookie policy below;
- if you provide a credit or debit card as payment, we also use third parties to check the validity of the sort code, account number and card number you submit in order to prevent fraud (see data sharing below);
- we use information you provide to investigate any complaints received from you or from others, about our services or the properties which we deal with;
- we will use data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation); and
- we use data of some individuals to invite them to take part in market research;

#### Where you give us consent:

- we will send you direct marketing in relation to our relevant products and services, or other products and services provided by us and our partners such as:
  - -Mortgage brokers we are partnered with for mortgage services and advice
- -Independent financial advisors for advice relating to your property and the services we offer
- -Solicitors and Conveyancing agents for legal advice relating to your property and the services we offer
- we place cookies and use similar technologies in accordance with our Cookies Policy and the information provided to you when those technologies are used; and
- on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law:
- to verify your identity; and
- In response to requests by government or law enforcement authorities conducting an investigation.

## Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may each have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our respective legitimate interests.

You have an absolute right to opt-out of direct marketing or profiling we carry out for direct marketing, at any time. You can do this by following unsubscribe instructions by contacting us using the details set out below.

#### Who will we share this data with, where and when?

We will share your personal data with companies for the purpose of providing a service to you and understanding your use of our products and services.

# We may share your data with

- Mortgage brokers we are partnered with for mortgage services and advice;
- Independent financial advisors for advice relating to your property;
- Solicitors and conveyancing agents for legal advice relating to your property;
- Any other named party to a signed contract, such as your landlord or tenant;
- Third parties who provide services to the property for maintenance and repairs including plumbers/electricians/builders/carpenters-);
- Surveying companies for surveying services required for the sale/purchase of your property;
- Utilities companies where we are required to do so to adhere to a tenancy agreement;
- Referencing companies to obtain references for letting a property;
- Block managers where a let property is a leasehold property;
- Inventory companies who conduct check ins and check outs; and
- Insurance and warranty companies where you have decided to buy a product or service through us.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on behalf of Viva Lettings and Property Management Ltd to help us run this website and also to provide our services to you. Such third parties include providers of identity checking, referencing, database management, email communications.

In the event that we sell or integrate our business with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

When necessary, we are required to collect certain details of visitors to our Company. We need to know visits names, telephone numbers, and where appropriate company name. This is in respect of our Health and Safety and Safeguarding Policies.

## How long will you retain my data?

Where we process personal data in connection with performing a contract, we keep the data for 7 years from your last interaction with us.

Where we process registration data, we do this for as long as you are an active user of our sites and for 7 years after this.

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

# 2) The right of access

At any point an individual can make a request relating to their data and Relocation Lettings and Property Management Ltd will need to provide a response (within 1 month). Relocation Lettings and Property Management Ltd can refuse a request, if we have a lawful obligation to

retain data but we will inform the individual of the reasons for the rejection. The individual will have the right to complain to the ICO if they are not happy with the decision.

#### 3) The right to erasure

You have the right to request the deletion of your data where there is no compelling reason for its continued use.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office.

#### 4) The right to restrict processing

Customers, visitors and staff can object to Relocation Lettings and Property Management Limited processing their data. This means that records can be stored but must not be used in any way, for example reports or for communications.

## 5) The right to data portability

If Relocation Lettings and Property Management Limited requires data to be transferred from one IT system to another; such as from Relocation Lettings and Property Management Limited to the Insurance Company. These recipients use secure file transfer systems and have their own policies and procedures in place in relation to GDPR.

# 6) The right to object

Parents, visitors and staff can object to their data being used for certain activities like marketing or research.

# 7) The right not to be subject to automated decision-making including profiling.

Automated decisions and profiling are used for marketing based organisations. Relocation Lettings and Property Management Limited does not use personal data for such purposes.

## Storage and use of personal information

All paper copies of clients and staff records are kept in a locked filing cabinet in the Relocation Lettings and Property Management Limited office in Birmingham. Members of staff can have

access to these files but information taken from the files about individual clients is confidential and apart from archiving, these records remain on site at all times. These records are shredded after the retention period.

Information about individual clients is used in certain documents, such as; Contracts and supporting documents. These documents include data such as clients names, telephone number, email address and address, employment details and identification documents. These records are shredded after the relevant retention period.

Relocation Lettings and Property Management Limited collects a large amount of personal data every year including; names and addresses of those who have contacted us with an enquiry. These records are deleted if the customer does not confirm a viewing or any services from ourselves.

Relocation Lettings and Property Management Limited stores personal data held visually in photographs. No names are stored with images in photo albums, displays, on the website or Relocation Lettings and Property Management Limited social media sites.

Access to all Office computers is password protected. When a member of staff leaves the company these passwords are changed in line with this policy and our Safeguarding policy. Any portable data storage used to store personal data, e.g. USB memory stick, are password protected and/or stored in a locked filing cabinet.

GDPR means that Relocation Lettings and Property Management Limited must;

- \* Manage and process personal data properly
- \* Protect the individual's rights to privacy
- \* Provide an individual with access to all personal information held on them

Limited in May 2018.
Signed on behalf of Relocation Lettings and Property Management Limited

This Policy was adapted at a meeting at Relocation Lettings and Property Management

Policy review date: September 2018