

DATED 24th May 2018

PRIVACY NOTICE provided by Denfords Property Management.

This privacy notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during our management of our clients developments and after it ends. We are required to notify you of this information under the General Data Protection Regulation. Please ensure you read this notice (sometimes referred to as a “privacy notice”) and any other similar notice we may provide to you from time to time when we collect or process personal information about you. This privacy notice contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

1. WHO WE ARE

Denfords Property Management collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

In this privacy notice, references to “we” or “us” or “our” means Denfords Property Management

2. DATA PROTECTION PRINCIPLES

We will comply with the data protection principles when gathering and using personal information, as set out in our GDPR data protection policy.

3. THE PERSONAL INFORMATION WE COLLECT AND USE

INFORMATION COLLECTED BY US

In the course of the performance of our contract as managing agent for our clients where you are a leaseholder, shareholder, member of a company, freeholder and subtenants we collect the following personal information when you provide it to us:

- Your Name, address, email address, telephone number(s) and other contact details
- Name, address, email address, telephone number(s) and other contact details of your emergency/alternative contact.
- Information required to provide you with a service and details of our services that you have used (for example, attendance of a contractor at your property)
- Details of any enquiry you have made to Denfords Property Management (for example, queries submitted via our website)

The provision of the above information is required from you to enable us to perform our contract as managing agent, meet our regulatory and legislative obligations. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

4. THE PERSONAL INFORMATION WE COLLECT AND USE:

INFORMATION COLLECTED FROM OTHER SOURCES

We also obtain personal information from other sources as follows:

- Personal contact details including name, phone number(s), address, email address, alternative emergency contact details including name, phone number(s), address, email address, financial information related to the payment of service charges and/or ground rent from the previous managing agent at the point we take over as managing agent.
- Personal contact details including name, phone number(s), address, email address, alternative emergency contact details including name, phone number(s), address, email address, financial information related to the payment of service charges and/or ground rent from the appointed solicitor and/or conveyancer at the point that a property is purchased
- name, phone number(s), address, email address, alternative emergency contact details including name, phone number(s), address, email address from other lessees, shareholders, members of your management company, freeholders and members of the public.

5. HOW WE USE YOUR PERSONAL INFORMATION

We will typically collect and use this information in order to ensure the performance of a contract you have with our client and pursuant to which we are appointed as their agent and for the purposes of our legitimate interests or those of a third party, but only if these are not overridden by your interests, rights or freedoms. We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

6. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share the following categories of personal data:

- Name
- Phone number(s)
- Address(es)
- Email address(es)
- Financial information related to the payment of service charge(s) and/or ground rent(s)
- Alternative emergency contact details including name, phone number(s), address(es), email address(es).

This personal information may be shared with the following categories of recipients:

- Contractors providing vital services to the development where your property is based
- Auditors from the self-regulatory bodies the Association of Residential Managing Agents (ARMA) and The Royal Institute of Chartered Surveyors (RICS) in compliance with the terms of our membership to the aforementioned organisations.
- The chosen accountant of the management company
- Governmental bodies such as Companies House
- Solicitors appointed to act in the conveyance of a property
- Solicitors appointed to act in collection of service charge or ground rent arrears

This data sharing enables us to perform our contract as managing agent.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

We do not engage in Direct or Indirect marketing.

7. WHERE YOUR PERSONAL INFORMATION MAY BE HELD

Information may be held at our offices and third party agencies, service providers, representatives and agents as described above.

We have security measures in place to seek to ensure that there is appropriate security for information we hold including those measures detailed in our GDPR data protection policy.

8. HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

- We will hold name, phone number(s), address, email address, alternative emergency contact details including name, phone number(s), address, email address, financial information related to the payment of service charges and/or ground rent for the duration of our time as managing agent or for your ownership of a property in the development and/or membership of one of our client companies.
- We will hold name, phone number(s), address, email address, alternative emergency contact details including name, phone number(s), address, email address, financial information related to the payment of service charges and/or ground rent for a period of 7 years plus the current financial year from our time as managing agent or from your ownership of a property in the development and/or membership of one of our client companies; whichever occurs soonest.
- We will hold name, phone number(s), address, email address, alternative emergency contact details including name, phone number(s), address, email address for a period of 3 years plus the current financial when related to a illness or injury allegedly incurred by an adult (over 18 years at the date of the injury or illness) on a development we manage.
- We will hold name, phone number(s), address, email address, alternative emergency contact details including name, phone number(s), address, email address, for a period of 21 years plus the current financial when related to an illness or injury allegedly incurred by an minor (under 18 years at the date of the injury or illness) on a development we manage.

9. REASONS WE CAN COLLECT AND USE YOUR PERSONAL INFORMATION

We rely on Legitimate Interest as the lawful basis by which we collect and use your Personal Data in order to complete the performance of our contract.

10. YOUR RIGHTS

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is

already designed to address

- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us
- let us have enough information to identify you
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them

11. KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

12. HOW TO COMPLAIN

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

13. CHANGES TO THIS PRIVACY NOTICE

This privacy notice was published on 24th May 2018.

We may change this privacy notice from time to time, and when we do information will be displayed publicly on our website