

# Data Privacy and Security Policy

## 1. Introduction

This Privacy Policy sets out how we use any information that you share with Central Property Lettings, or we get from other organisations, and how we protect your privacy.

By using our website, social media pages, or providing your information to us you consent to our collection and use of the information you provide in the ways set out in this policy.

## 2. Legal Information

S K Schmuck t/as Central Property Lettings

Central Property Lettings take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation which is applicable from 25<sup>th</sup> May 2018.

We may make changes to this policy from time to time. If we do so, we will post the changes on this page and they will apply from the time we post them.

Our Data Protection Officer is Mr Stephen Schmuck – Contact (01723) 500057 and any questions relating to our privacy practices should be sent to him.

## 3. The Policy in Summary

It is important to consider the full policy to understand what information we hold, how we may use it, and what your rights are – but here is a quick summary:

- We collect information that is either personal data, ie. name, address, email or non-personal data place of employment, salary information
- We collect information about the people we assist; Tenants and Landlords
- We collect and process information to provide services, to provide information and for administration.
- We only collect the information that we need or that would be useful to us in our quest to provide the best possible service.
- We will only collect and use the minimum amount of data for the above purpose. The aim is to cause the minimum privacy impact, and anybody receiving information from us should not be surprised or likely to object.
- In certain instances, we collect and use your personal information by relying on the legitimate interest legal basis set out in General Data Protection Regulations (GDPR) 2018.
- We do our very best to keep personal information secure, including personal data online.
- We will never sell your data and we will never share it with another company for marketing purposes.
- We only share data where we are required by law or with carefully selected partners who do work for us. All our partners are required by their contract to treat your data as carefully as we would, to only use it as instructed by us, and to allow us to check that they do this.
- Our website uses cookies. Cookies are an essential part of our Site works and are placed there and used solely by Central Property Lettings. We also offer you the facility to share your experience on our site through social media sites such as Facebook and Twitter. By using these features, you are consenting to allow cookies from these providers. More information on how these providers use Cookies can be found at their websites.

## **4. The Full Policy - Data Privacy and Security Policy**

This policy applies to all the websites we operate, our use of emails and text messages for marketing purposes, and any other methods we use for collecting information. It covers what we collect and why, what we do with the information, what we won't do with the information, and what rights you have.

## **5. What information do we collect and why?**

We will only ever collect the information that we need to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you.

- Personal information such as name, postal address, phone number, NI number, email address, date of birth (where appropriate), Nationality, your preferred contact preferences, other information relevant to the tenancy, ie. next of kin details and information, bank or debit card details.

## **6. What do we do with the information?**

We will use the information you provide to:

- Process rent payment transactions, other payments and verify financial transactions
- To enable us to supply you with the services and information which you have requested
- To undertake and perform our obligations and duties to you in accordance with the terms of our contract with you.
- Carry out specific activities associated with the setting up and management of a tenancy.
- To carry out due diligence on any prospective tenant, including whether there may be any money judgements against them, or any history of bankruptcy or insolvency.
- Provide a personalised service to you
- Record any contact we have with you
- Prevent or detect fraud or abuses of our websites and enable third parties to carry out other functions on our behalf
- For all other purposes consistent with the proper performance of our operations and business.

## **7. We will mainly use your data to:**

- Provide you with the services or information you have asked for
- Handle instruction, deliver our services and communicate with you about matters relating to the setting up and management of the tenancy.
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services.

## **8. Using your information for marketing**

As of May 2018, We will only send marketing information to people who have specifically said that they agree for us to do so and to those, Central Property Lettings have a legitimate interest in communicating with.

## 9. Consent

Data Protection says that we are allowed to use and share your personal data only when we have a proper reason to do so. The law says we must have one or more of these reasons and these are:

Contract: Your personal information is processed in order for us to fulfil a contractual arrangement – ie. Tenancy Agreement

Consent: where you agree to us using your information in this way

Legitimate interests: This means the interests of Central Property Lettings in managing our business to provide you with the best service in the most secure and appropriate way.

Legal obligation: Where there is a statutory or other legal requirement to share the information – ie. for law enforcement purposes.

Having given consent by any communication channel, you may withdraw that consent at any time by contacting our office on (01723) 500057 during office hours Monday to Friday or by emailing: [info@centralpropertylettings.co.uk](mailto:info@centralpropertylettings.co.uk)

## 10. Sharing your information

We will only share your information if:

- We are legally required to do so, e.g. by a law enforcement agency legitimately exercising a power or if compelled by an order of the Court
- We believe it is necessary to protect or defend our rights, property or the personal safety of our people or visitors to our premises or websites
- We are working with a secure partner that is carrying out work on our behalf. These secure partners may include The Deposit Protection Service, Let Alliance, i-Survey and IT specialists. The kind of work we may ask them to do includes; processing and mailing supporting documentation, answering questions in relation to the analysis they undertake, sending postal mail, emails and text messages, report production, carrying analysis and processing card payments.
- We enter into a joint venture with or merged with a business entity, your information may be disclosed to our new business partners or owners.
- To carry out due diligence on you as a prospective tenant/guarantor, including but not limited to the carrying out of affordability checks, due diligence checks and the obtaining of references from relevant parties, whose data you have provided.
- If you request so, your information shall be disclosed in order to determine if there are any money judgements against you, as the prospective tenant/guarantor, or to determine if they have a history of bankruptcy or insolvency.
- If you are unable to make payments under your tenancy, our information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you as a tenant
- In the creation, renewal or termination of the tenancy, your information will be disclosed to the relevant local authority, tenancy scheme deposit administrator, service/utility provider, freeholder, facilities manager or any other relevant person or organisation in connection with this.
- In the managing of the tenancy, your contact details will be disclosed to the appropriate trusted Contractors to enable access arrangements for fulfilling property maintenance requirements.
- Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent

We only choose partners we trust. We will only pass personal data to them if they have signed a contract that requires them to:

- Abide by the requirements of the Data Protection Act and GDPR
- Treat your information as carefully as we would

- Only use the information for the purposes it was supplied (and not for their own purposes or the purposes of any other organisation)

## 12. Storing your Information and Data Security

Information is stored by us on computers located in the UK. We may also store information in paper files.

We place a great importance on the security of all personally identifiable information associated with Tenants and Landlords. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. For example, only authorised personnel are authorised to access user information. While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to try to prevent this.

Unfortunately, the transmission of data across the internet is not completely secure and whilst we do our best to try to protect the security of your information we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

We will keep your information only for as long as we need it to provide you with the services or information you have requested, to administer your relationship with us, to comply with the law, or to ensure we do not communicate with people that have asked us not to.

When we no longer need information, we will always dispose of it securely.

## 13. What we don't do with your information

We will never sell or share your details to other organisations to use for their own purposes.

## 14. Your rights

**You have the right at any time to:**

- the right in certain circumstances to have inaccurate personal data rectified, blocked, erased destroyed
- Object to receiving any marketing communications from us
- Ask for a copy of the information We hold about you (known as a subject access request)

You have a right to ask us to stop processing your personal data, if it is not necessary for the purpose you provided it to us for (e.g. creating and managing a tenancy) we will stop. Please contact us on 01723 500057 office hours Monday to Friday or by emailing [info@centralpropertylettings.co.uk](mailto:info@centralpropertylettings.co.uk) if you have any concerns.

If you believe that any information we are holding on you is incorrect or incomplete, or you wish to change your contact preferences at any point you can do so by calling us on 01723 500057 office hours Monday to Friday or by emailing [info@centralpropertylettings.co.uk](mailto:info@centralpropertylettings.co.uk)

You have a right to ask for a copy of the information we hold about you.

If you want to access your information, send a description of the information you want to see and proof of your identity by post to Central Property Lettings, Central House, 14 Falsgrave Road, Scarborough, YO12 5AT. We may not accept these requests by email to ensure that we only provide personal data to the right person.

For more information about your rights under the Data Protection Act go to the website of the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)

