

## Keyholder Lettings and Management - Privacy Policy 25<sup>th</sup> May 2018

**Who are we?** - This privacy notice ("Privacy Notice") is provided by Keyholder Lettings Management Limited and Keyholder Lettings and Management Services Limited ("KLML"). References to "we", "our" and "us" in this Privacy Notice are references to KLML. We are a controller of your personal data under applicable data protection laws. This includes the General Data Protection Regulation from 25/05/18. As a controller we determine why and how we use your personal data. We do so to perform our contract with you as agents to a resident's management company or freeholder named within the lease or property title of a property where you are the leaseholder / owner (further details below).

**What is the purpose of this Privacy Notice?** This Privacy Notice explains how we collect, use protect and share your personal data. We may make changes from time to time. The date on the top of this notice indicates from when this Privacy Notice applies.

**Whose personal data do we collect?** We collect and process personal data about individuals who may be current, prospective and former leaseholders or dwelling owners at residential developments, or you are employed to provide services where we are appointed as agents by the resident management company or freeholder to provide secretarial and administration services to assist with the contractual supply of services, usually as detailed within the lease, property title or legislation. Examples of use are to supply copies of annual accounts, invoice you for service charge or to consult with you about provided services or if you are a contractor providing services to make payment to you.

**What kind of personal data do we collect?** We collect personal data such as your name, address, email address, and contact telephone numbers. We may ask for additional information on forms or related documents, for example, you may provide us with your bank details so we can refund payments to you. We will additionally hold account details relating to your payment of service charges, ground rent or insurance premiums as required by your lease or property title or if you are a contractor to allow us to make payments to you.

**How do we collect your personal data?** We may collect your data when it is supplied to us by your solicitor or legal representative at purchase or when supplied by you within an application or contact information form. You may supply additional information within correspondence or conversations with this office or conduct a transaction with this office. If you interact with us on-line then your computer or device is likely to show us your email address or other contact details you may automatically include.

**Do we collect information about you from third parties?** We may collect personal data such as your name, address and other contact information from a third party source such as a solicitor or legal representative when you are purchasing a property at a development where we are appointed as agent or from a letting agent if you let your property during your period of ownership.

**How will we use your personal data?** This section of this Privacy Notice explains for what purposes we use your personal data and on which legal basis we rely, to ensure we process your personal data in a lawful manner. Our legal basis for collecting and using your personal data will include:

(a) to perform our contract with you as appointed agent to a resident management company or freeholder at a site where we have been appointed as agent and to verify your identity when you contact us by telephone.

(b) to comply with legal obligations including company laws such as the maintenance of shareholder registers or membership registers.

(c) to pursue the legitimate interests of any resident management company or freeholder, which do not override your fundamental rights or interests such as recovering debts owned to the resident management company or freeholder, or providing your details to Companies House as a share register.

(d) to assist you in making an insurance claim if you suffer damage to your property where there is an insurance policy in place.

(e) to carry out required detection, investigation and prevention of fraud and other crime.

(f) for record keeping, and other business purposes, to provide services to you, for staff training and developing, improving our services to clients and providing information to you.

**Who do we share your personal data with?** We may share your personal data with third parties such as a solicitor or legal representative, a letting agent employed by you or an insurer providing cover for property you own or registrars, auditors, professional advisors, intermediaries and administration agents.

Where we share your personal data with our service providers (e.g. a banking service provider) we may allow them to process it as controllers under their privacy notices solely for the purposes of providing their services to us complying with their legal obligations or pursuing their legitimate interests in accordance with applicable laws. We do not allow service providers to market to you unless they have obtained your prior consent.

We may disclose your personal data to other third parties e.g. courts, government agencies, tax and other regulatory bodies where we are legally obliged to do so or in our reasonable opinion such disclosure is necessary to comply with applicable laws and legal processes, supports an investigation or protects our rights and interests.

We may also share your personal data with an alternative agent if instructions are transferred to an alternative agent or a potential buyer in connection with any merger or acquisition of any part or all of our business.

**How do we protect your personal data?** We implement appropriate technical and organisational security measures to include physical and technical security safeguards. We operate an internal model to see adequate policies, procedures and controls are in place within our organisation.

**How long do we hold your personal data for?** We may retain your personal data for as long as it is necessary for the purposes we collected the information and the appropriate retention periods for our contractual, legal and regulatory obligations and our legitimate business interests.

What are your rights in relation to the personal data we hold about you? Subject to the conditions prescribed in applicable laws, you have the right:

(a) to access, rectify or request erasure of your personal data

(b) to ask us to restrict processing of your personal data

(c) to request portability of it

(d) to object due to your personal circumstances to processing which is based on our, or a third party's legitimate interests

(e) to object to processing of your personal data for direct marketing purposes

You can exercise your rights by contacting us using the contact details below. You also have the right to lodge a complaint with a supervisory authority if you consider that the use of your personal data infringes the GDPR.

**How you can contact us.** If you have any questions or concerns please contact us in writing at Keyholder Lettings Management Limited, 48a Aylesbury Street, Fenny Stratford, Milton Keynes, MK2 2BA