

Belvoir Rugby Landlord Privacy Notice

OWNER: Rosie Callaway

25th May, 2018

STATUS: **LIVE**

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1. Landlord Privacy Notice

VERSION CONTROL

DATE	VERSION	Description of Change	Change Author
25.4.18	1.0	Created to comply with GDPR	Paul Callaway

1. Landlord Privacy Notice

Bacall Limited trading as Belvoir Rugby is committed to protecting and processing your personal data in accordance with the General Data Protection Regulations and the Data Protection Act 2018 (the legislation). For the purpose of the legislation and your personal data, Belvoir Rugby is the Data Controller, Rosie Callaway is the person responsible for data protection and can be contacted at 41 Newbold Road, Rugby, CV21 2ND

The General Data Protection Regulations are to safeguard your personally identifiable information or personal data. This ‘plain English’ Privacy Notice will be regularly reviewed and updated as part of our ongoing program of improvement and protection.

Information held

The personal data we *collect and process* may include your:

- name, address, email addresses and telephone numbers
- date of birth, gender, marital status

...and sometimes other sensitive data, which may include your:

- banking details, credit history
- your National Insurance and PAYE numbers
- previous names you’ve been known by
- (proof of) nationality
- identification data (for example your passport or driving license information)
- entries in your name on the Land Registry

Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, your refusal to provide the data may mean that we are unable to provide you with our service.

To ensure that we provide you with the best service possible we will need to collect and retain certain personal data. The data may be collected and processed by any Belvoir Rugby staff member. We collect the information in person, over the telephone or in written form.

Lawful basis of processing

There are 6 lawful bases of processing your data including consent, legitimate interest, contract fulfilment, a legal obligation and a vital interest. Belvoir Rugby’s lawful basis is predominantly ‘Contract’ – i.e. that the processing is necessary for us to meet our obligations under a contract you have with us, or because you have asked us to undertake specific steps before entering into a contract (providing a valuation of your property, or works on your property example). Your personal data will be processed during and after your contract and any subsequent contract with us.

Online identifiers, IP addresses and cookie identifiers

Where you visit our website we may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to

report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns.

We may obtain information by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site. You can find more information about cookies at www.allaboutcookies.org

This policy only applies to our site. If you leave our site via a link or otherwise, you will be subject to the privacy policy of that website provider. We have no control over that privacy policy or the terms of the website and you should check their privacy policy before continuing to access the site.

Recipients of personal data

It may be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations in order to fulfil our service with you. These may include:

- Service Contractors (such as plumbers, glaziers, electricians, gardeners etc.)
- Your tenants, who have a legal entitlement to request your name and contact details
- Our service partners including utility service management/comparison companies, utility providers, local Councils, Reputation.com and insurance companies

Where is the data stored?

Your personal data is stored...

- Electronically; within our policy controlled and password protected communication and customer management systems...
- ...physically (hard copy); within our policy controlled and physically secure office...

...and the data is stored within the European Union, or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period

We will retain some elements of your personal data for up to 7 years after our working relationship ends to comply with accounting legislation. What information can be anonymized will be, when no longer required for either contractual fulfilment or a legitimate interest. If the lawful basis for processing your data was deemed to be consent then you may withdraw consent at any time.

Your rights

You have a ‘right of access’ to check your personal data, to verify the lawful basis of processing. We are obliged to respond to a written access request within 30 days and may not charge a fee unless the request is unfounded, excessive or repetitive. If a fee *is* charged it will be a reasonable fee based upon the administrative cost of providing the information.

You have a right to rectification if the data we hold is either inaccurate or incomplete. If your data has been disclosed to third parties then we must inform them of the rectification, where possible.

You have a right to erasure of your data when consent is our basis of processing (the right to be forgotten). You may request that your personal data be erased, for example, where there is no compelling reason for its continued processing or where you withdraw consent. We will comply with your request unless we have another basis of processing justifying our retaining the data (for example a legal requirement or the defence of a legal claim).

You have some rights to ask us to restrict processing i.e. to block or suppress processing where, for example, the data may be incorrect and whilst the accuracy is verified. We are permitted to store the data.

Your right to object

You do have a right to object to further processing of your personal data. We may be required to stop processing unless there is some other legitimate basis of processing such as a legitimate interest or a requirement for the exercise or defence of a legal claim.

Withdrawal of consent

Where the lawful basis for processing is your consent, you may withdraw consent at any time by writing to, Rosie Callaway, Bacall LTD, at 41 Newbold Road, Rugby, CV21 2ND.

Further Information

You can read more about the GDPR at ico.org.uk.

2. Complaints procedure

Our complaints procedure covers suspected GDPR breaches and can be emailed to you on request. It contains information on how to make a complaint and how you can expect us to investigate it.

The supervisory authority responsible for data protection is the Information Commissioners Office (ICO) to whom concerns may be reported by phone on **0303 123 1113** or +44 1625 545 745 if calling from outside the UK, by email using the form on the website ico.org.uk or the livechat function.