

## Introduction

This is the privacy notice of Property Partners Management Ltd (registration number: 5022004) whose registered office is at 52-53 Margaret Street, London, W1W 8SQ.

This privacy notice sets out how we collect and process your personal data. This privacy notice also provides certain information that is legally required and lists your rights in relation to your personal data.

This privacy notice relates to personal information that identifies you as a natural person (whether you are a freeholder, a landlord, a leaseholder, an individual who browses our website or an individual outside our organisation with whom we interact). We refer to this information throughout this privacy notice as personal data or personal information and further detail of what this includes are set out in this privacy notice below.

The privacy and security of your personal information is very important to us, so we want to assure you that your information will be properly managed and protected by us at all times. Please read this privacy notice carefully as it explains how we may collect and use your personal data.

This privacy notice may vary from time to time so please check it regularly. This privacy notice was last updated in **May 2018**.

## How to contact us

### *Controller and contact details*

For the purposes of relevant data protection legislation, we are a **controller** of your personal data. As a controller we use (or **process**) the personal data we hold about you, your tenants and suppliers in accordance with this privacy notice.

If you need to contact us in connection with the use or processing of your personal data, then you can do so using our contact details on our website, <http://www.propertypartners.co.uk/>

## What information we hold about you and where we obtain this from

The personal data that we collect may include the following information:

- Personal data you provide to us in person, via our website portal or by telephone, letter or email
- Personal data provided to us by the freeholder or landlord
- General information about you, such as your name, address, contact details and date of birth
- Financial details, such as your bank account and card details
- Information about your use of our website such as your IP address, which is a unique number identifying your computer, including personal data gathered using cookies

We also collect information from publicly available sources and third-party databases made available to the relevant industry for the purposes of reducing fraud and financial crime, as well as any other third-party databases where your personal data may be held, provided such third parties have lawful bases on which to share such personal data with us.

**How we use your personal data and the lawful basis for doing so – Where we are relying on a basis other than consent**

We may rely on one or more of the following legal bases when processing your personal data for the following purposes:

<b>Purposes for which we process your personal data</b>	<b>The basis on which we can do this (this is what the law allows)</b>
In order to perform our legal obligations to you. This would include our fulfilling your requests via any contract that you enter into with us our online portal	The processing is necessary in connection with any contract that you enter into with us
To administer your account, including financial transactions for the service we have provided you	The processing is necessary in connection with any contract that you enter into with us
To assist in the prevention and reduction of fraud and other financial crime	The processing is necessary for us to comply with the law and our legal requirements
In the interests of security and to improve our service, telephone calls you make to us may be monitored and/or recorded	The processing is necessary to pursue our legitimate interest in the management and operation of our business
CCTV on sites we manage.	The processing is necessary to pursue our legitimate security interest in operating our managed sites

## Who we pass your personal data to

We may need to pass your personal data to other companies which may include:

- The buildings insurers in order to comply with any conditions specified by the Insurer. This may also include loss recovery agencies, and other third parties involved (directly or indirectly) in the administration of this insurance.
- Firms that provide administration and processing services to us or on our behalf under contract in order to complete activities such as IT systems and administrative services and other activities set out in this privacy notice, as well as support activities such as finance and auditing services.
- Building contractors undertaking work on your property.
- Organisations that have a specific role laid out in law, such as statutory bodies, regulatory authorities and other authorised bodies.
- Other organisations where we have a duty to, or are permitted to disclose your personal information by law, for example if we received a valid request from the police or other third-party organisation in the interest of preventing and detecting crime.
- Fraud prevention agencies and operators of registers available to the industry to check information and prevent fraud.
- Third parties we use to recover money you may owe us.
- Local Housing Authorities in accordance with section 212A of the Housing Act 2004.

The information you share with us may be transferred by us or any of the types of firms or organisations we have noted above, to other countries in order for processing to take place, including locations outside of the UK and the European Union. We will only do so if there are adequate levels of protection in place as required by applicable data protection laws.

## Accessing our website and cookies

When you visit our website, we may collect information from you, such as your email address, IP address and other online identifiers. This helps us to track unique visits and monitor patterns of customer website traffic, such as who visits and why they visit. We use third parties to collate IP addresses to help us understand our Internet traffic data and data regarding your browser type and computer. We may also use web usage information to create statistical data regarding the use of our website. We may then use or disclose that statistical data to others for strategic development purposes, but no individuals will be identified in such statistical data.

We may use cookies on some pages of our website. A cookie is a small text file sent to your computer. Cookies help us to give you a more tailored service. Useful information about cookies, including how to remove them, can be found at <http://allaboutcookies.org>.

Internet browsers normally accept cookies by default, although it's possible to set a browser to reject cookies. We'll ask your permission before using any cookie that's not essential to the email or the use of the website. However, refusing to accept cookies may restrict your use of our website and/or delay or affect the way in which our website operates. You can find more information on cookies when you visit our website.

The open nature of the internet is such that data may transfer through networks without security measures and may be accessed and used by people other than those for whom the data is intended. While this is outside of our control, we do take the protection of your information very seriously and aim to apply appropriate levels of security at all times.

## Marketing

We do not pass your personal data to any third party in relation to marketing products and services.

## Your Rights

We will only store your data for as long as is necessary to comply with the requirements of your contract with us, and any legal obligations or lawful processing conditions that may exist as a result.

You have a number of rights concerning the personal information we use, which you may ask us to observe. In some cases, even when you make a request concerning your personal information, we may not be required, or be able to carry out your request as this may result in us not being able to fulfil our legal and regulatory obligations under the lawful processing conditions under which we hold your data or because there is a minimum statutory period of time for which we have to keep your information.

You can ask us to:

- Provide a copy of your personal information
- Correct or delete unnecessary or inaccurate personal information
- Restrict or to object to the use of your personal information at any time
- Where we rely on your consent to use your personal information, you can withdraw that consent at any time. Where your consent is withdrawn, your previous consent will remain valid in respect of our use of your information prior to the date you withdrew it.

If you have any questions or concerns about this privacy notice or your data protection rights, please contact us using our details set out at the beginning of this privacy notice.

You also have the right to make an enquiry or to complain to the Information Commissioner's Office (ICO) if you are unhappy with our use of your data, or if you think we have breached a legal requirement. Further details about the ICO are available at: [www.ico.org.uk](http://www.ico.org.uk).