

Cordrose Management Limited

PRIVACY POLICY (DATA PRIVACY NOTICE)

Introduction

We need to collect and use information about customers for our services. This personal information or data, as defined, must be collected and managed appropriately however it is collected and recorded. The Data Protection Act 1998 ("the Act") and the General Data Protection Regulations ("GDPR" 2018) provide safeguards.

We are committed to ensuring data security and the fair and transparent processing of your data. This policy contains important information on how and why we collect, store, use and share personal data, your rights in relation to your personal data and how to contact us if you have any concerns about how we process your data.

We process personal data to enable us as to carry out property management services, to maintain our accounts and records, and to support and manage our employees, contractors, agents and third parties we engage with. We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Who we are

Cordrose Management Limited is a limited company registered in England and Wales, registration number 5314335. We may be contacted at our registered office which is 29 Mayford Road, London SW12 8SE, telephone 020 3633 0105, email CML@cordrose.co.uk. Cordrose Management Limited is registered as a Data Controller, registration number ZA246710. Under GDPR we do not have a statutory obligation to designate a Data Protection Officer.

What personal data do we collect?

We collect and process certain types of information (data) as part of our normal business activity. Personal data, or personal information, means any information that is clearly about you which could be used to identify you directly or indirectly. We may collect, use, store and transfer different kinds of personal data about you under these headings:

- **Identity Data** records of names, titles, dates of birth and occupations for individuals
- **Contact Data** records of contact information and addresses, email addresses and telephone numbers
- **Tenancy Data** records concerning information about the property or land demised to you or owned by you
- **Transaction Data** records details about payments received from you or made to you
- **Communication Data** records your preferences for how you wish to receive information from us

We do not normally collect or hold:

- **Financial Data** that is personally identifiable financial information such as bank account / card details that is linked to you, unless you request us to make an electronic payment to you
- **Sensitive Personal Information** this category of data is information about you including racial or ethnic origin; political opinions; religious or other beliefs; trade union membership; physical or mental health details unless this is pertinent to the services we supply (an example might be if someone uses a wheelchair and it is relevant for us to know about this)
- **Technical Data** such as your internet protocol (IP) address or other related technology including cookies, tracking and similar technologies is never collected

Where does this data come from?

Our data is collected mainly through direct interactions. This may include that you have provided this information to us by corresponding with us by post, phone or email. Data may also be provided to us by third parties in order that we can contact you.

If you fail to provide personal data where we need to collect personal data by law, or under the terms of a contract and you fail to provide that data when requested, we may not be able to perform the contract we have or where you are a recipient for services.

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What is our legal basis for collecting data?

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so. Where we process your information on this basis, we do after having considered whether the same objective could be achieved through other means, whether processing (or not processing) might cause you harm, whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

Where there is a contract between us or where you are a recipient of services under a property management contract we will be processing your data to fulfil our obligations under such a contract.

How will the data be used?

We may process your data on this basis for the purposes of record-keeping for the proper and necessary administration of our property management services where we act as managing agents. This could be to enable us to communicate with you or respond to communications from you to which we believe you would expect a response, to protect and assert the legal rights of any party, for us to receive professional advice we require for ourselves or our clients, and to protect your interests where we believe we have a duty to do so. It may also be used for marketing our services.

This information may be processed about landlords, tenants, professional advisers and consultants, suppliers, complainants, enquirers and employees.

Will the data be shared with any third parties?

We treat personal information (data) confidentially. There are circumstances where we may share your personal data with other organisations and the individuals themselves.

The types of organisations we may need to share some of the personal information we process, for one or more reasons, includes business associates, suppliers of goods or services, financial organisations, debt collection and tracing agencies, local and central government, law enforcement or security organisations.

Where a third-party recipient is located outside the European Economic, the transfer of personal data must be protected by appropriate safeguards. We do not transfer any personal information outside the European Economic Area.

How long will we store your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including where we need to satisfy legal, accounting, or reporting requirements.

We will retain your personal information for the duration of the contract and for a minimum period of six years following the termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements or any orders from competent courts or relevant authorities.

How is your data stored?

We take reasonable steps to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. All our information is stored securely electronically on servers or devices. Certain information is also retained on a secure basis in hard copy format.

We will notify you and the relevant Regulator(s) such as the ICO of a suspected data security breach where we are legally required to do so.

What rights do you have in relation to your personal data?

Under the Data Protection Act 2018 and GDPR regulations you have specific rights with respect to our use of your personal data:

- Right to be informed – your right to be informed about the collection and use of their personal data. This is a key transparency requirement under the GDPR.
- Right of access – your right to access their personal data, which is commonly referred to as subject access.
- Right of rectification - your right to have inaccurate or incomplete personal data rectified. While we aim to keep your personal data up to date, please contact us if your personal data changes or you believe that it is not accurate or complete.

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- Right to Erasure (the Right to be Forgotten) – your right once there is no longer a legitimate basis to use it or for us to process it, to request that your personal data is deleted. The right is not absolute and only applies in certain circumstances.
- Right to Object to processing of data – your right to object to the processing of your personal data in certain circumstances, for example, where there is no overriding legitimate interest for us to continue to process your data.
- Right to data portability – your right to move, copy or transfer personal data which you supplied to us for your own purposes, or to be transferred to another data controller
- Rights related to automated decision making including profiling - GDPR applies to all automated individual decision-making and profiling. This type of decision-making is only permitted where the decision is necessary for the entry into or performance of a contract, or authorised by law, or based on the individual's explicit consent.

Please contact us (see below) if you wish to exercise any of your rights. Note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception, we will explain this to you in our response.

How to make a Subject Access Request

You have the right to get a copy of the information that is held about you. This is known as the right of access or more commonly a Subject Access Request (SAR). This right of subject access means that you can make a request to any organisation processing your personal data. The Data Protection Act 2018 states that an individual, who makes a written request, is entitled to receive confirmation as to whether any personal data concerning him or her is being processed; and where that is the case receive the following information:

- the purpose of and legal basis for the processing
- the categories of personal data concerned
- the recipient or categories of recipient to whom the personal data has been disclosed
- the period for which it is envisaged that the personal data will be stored, or the criteria used to determine that period
- the existence of the data subject's right to request a) rectification of personal data b) erasure of personal data or the restriction of its processing

To do this, provide us with information to confirm who you are (we may require proof of identity) and provide us with necessary information so that we can contact you. If you are asking for information about someone else, you must provide written evidence that you have the authority to act for that person.

We will provide the information to you within one month of your request, provided we receive the identification information specified above in good time. However, if the request is complex we may take an additional month to provide this to you.

Normally, we will not charge a fee to provide you with the information. However, where we determine the request is manifestly unfounded or excessive, we reserve the right to charge a reasonable fee or refuse to respond. If we refuse to respond, we will provide you why we have refused to respond and advise you that you have the right to complain to the Information Commissioners Office.

It is important to remember that not all personal information is covered and there are certain exemptions which may allow us to refuse to comply with your subject access request in certain circumstances. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person or if your request is manifestly unfounded or excessive.

Contact and complaints

If you would like to contact us about the use of your personal data, our privacy practices, or exercising your personal rights then please contact us at CML@cordrose.co.uk

Complaints: If you believe that your data protection rights have been breached and we have been unable to resolve your concern, you have the right to report your complaint to the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/>.