

MasonKnight Privacy Policy May 2018

This is an important notice regarding your privacy and the way in which MasonKnight Properties (referred to as “we”, “our”, “us” in this policy) collects and makes use of your personal data. We want to be open and transparent with you, and therefore encourage you to contact us if you have any questions about this policy or the ways in which we use your personal data.

This policy applies to our applicants, prospective tenants, tenants, business contacts (i.e. contractors), suppliers and clients. We take our privacy responsibilities seriously and are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of applicable privacy legislation, the data controller is MasonKnight Properties, 201B Tiverton Road, Selly Oak, B29 6DB. Questions regarding this policy should be directed to our Data Protection Compliance Manager who can be contacted at dataprotectionofficer@masonknightproperties.com. The Data Protection Compliance Manager is responsible for ensuring compliance with relevant data protection legislation and with this policy. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Compliance Manager.

1. What information do we hold about you?

We may collect, store and use personal data about you (referred to throughout this privacy policy as **personal information**):

Applicants, Prospective tenants, tenants

- Personal contact details such as your name, title, address, telephone number, date of birth and e-mail address.
- Tenancy information (including personal information such as copies of IDs, your National Insurance number, your proof of earnings, your guarantor’s information including IDs, and proof of earnings).

Business contacts, suppliers

- Contact details such as your name, title, business and personal addresses, and business and personal telephone numbers, and business and personal e-mail addresses.
- Information that you provide or we collect during our interactions with you or your employer, such as how long we have done business with you or general information of your business

Clients

- Personal contact details such as your name, address, telephone number and e-mail address.
- Copies of your IDs with your consent
- Payment information such as Account Name, Account Number and sort code
- Other personal information provided to us, for example, your registered company's information

Contractors and Suppliers

- Personal details such as your name, address, email address, bank account information and telephone number.

Generally

- If you visit our offices, images and videos are recorded by the CCTV system in operation on our premises.
- Any personal information you provide to us during your interactions with us.

2. How will we use your personal information and what is the legal ground we rely on for doing so?

We will only use your personal information when the law allows us to. When we use your personal information, we must have a legal ground for doing so. The following are (amongst others) the legal grounds by which we can use your personal information:

- Where you have provided us with your consent for us to do so;
- Where we need to perform the contract we have entered into with you or to take steps to enter into a contract with you;
- Where we need to comply with a legal obligation to which we are subject;
- Where it is in pursuit of our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

More specifically, we will use your personal information in the following circumstances:

Applicants, Prospective tenants, tenants:

- To evaluate and progress your application for tenancy with us – to perform the contract with you or to take steps to enter into a contract with you, and in pursuit of our legitimate interests to verify your suitability for tenancy of the property
- To carry out right to rent checks – to comply with a legal obligation.

Business contacts, suppliers

- Your contact details to provide you with information on our products and services. This may include technical information and/or marketing information – in pursuit of our legitimate interests in keeping you informed about our products, services and business updates.
- us with your consent for us to do so.

- To provide potential customer samples – in pursuit of our legitimate interests in keeping you informed about our products, services and business updates.

Clients

- Dealing with your enquiry made – in pursuit of our legitimate interests to ensure your enquiry is dealt with promptly and efficiently.
- Your contact details to provide you with information on our products and services. This may include marketing information – where you have provided us with your consent for us to do so.
- To carry out right to rent checks – to comply with a legal obligation.

Contractors and Suppliers

- Your personal details – in pursuit of our legitimate interests (to facilitate business between you and us).

Generally

- To ensure our premises are kept secure – in pursuit of our legitimate interests (in ensuring our premises are kept secure and to keep evidence of this).
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes – in pursuit of our legitimate interests (to better understand how people interact with our website and solve any issues it may have).
- To transfer to third party service providers – in pursuit of our legitimate interests (in credit and income check carried out by legitimate referencing agency or solicitor).
- To contact you if we wish to use your information for a purpose not set out in this policy – to comply with a legal obligation.

3. What happens if there is a change of purpose?

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

4. Which type of third parties might we share your personal information with?

We require third parties to respect the security of your personal information and to treat it in accordance with the law. For example, where we instruct third party service providers, we carry out due diligence on those providers to ensure they treat your personal information as seriously as we do.

We may share your personal information with the following types of third parties:

- Solicitors and credit referencing company to carry out credit checks
- Local council, utility providers for bills information relating to the property
- Government authorised deposit scheme

- Providers which host our software data and App Data in their data centres (We use servers in the UK. We have put in place standard contractual clauses between these to ensure the transfer of personal data is lawful).
- Customer relationship management software used during the course of business.

5. Data retention

How long will we use your personal information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. We assess the appropriate retention period for different information based on the size, volume, nature and sensitivity of that information, the potential risk of harm to you from unauthorised use or disclosure of that information, the purposes for which we are using that information, applicable legal requirements for holding that information, and whether we can achieve those purpose(s) through other means.

Applicants, prospective tenants, tenants

- Where your application for tenancy with us is successful, we will provide you with further information as to how we use your personal information during the course of your employment.
- Where your application for tenancy is unsuccessful, we will keep your personal information and application details, for 6 months.

Business contacts and suppliers

The period we keep your personal information depends on a number of circumstances. For example:

- Where we have collected your personal information during the course of your and our organisations doing business, we will keep your personal information for as long as this business continues, or for as long as we have a commercial interest in holding your personal information, for example, with a view to doing business in the future.
- Where you have consented to us using your photograph or logos for marketing purposes for as long as we still have your consent.

Clients

- If you have consented to receiving marketing information, we will keep your personal information for as long as we still have your consent.

Contractors and Suppliers

- We will keep your personal information for as long as we and you do business together or for as long as we have a commercial interest in holding your personal information or company information, for example, with a view to doing business in the future.

Generally

- Any data collected through our CCTV system is stored by our building managers.

6. Where we store your personal data

Electronic versions of your personal information are stored on servers in the UK. Where we use third party service providers to assist us, your personal information may also be stored in accordance with their practices and procedures. We require third parties to respect your personal information and to treat it in accordance with the law.

7. Rights of access, correction, erasure and restriction

Your rights in connection with your personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your personal information. This enables you to ask us to delete or remove personal information when there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Compliance Manager in writing using the contact details set out at the beginning of this privacy policy.

8. No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

9. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access any personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to another person who has no right to receive it.

10. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Compliance Manager in writing using the contact details set out at the beginning of this privacy policy. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

11. What happens if you fail to provide personal information?

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing you with our products or services), or we may be prevented from complying with our legal obligations .

12. Right to complain

You have the right to make a complaint if you wish to do so. The organisation with oversight of our processing is the Information Commissioner's Office, which can be contacted in writing at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone (0303 123 1113) or by e-mail (casework@ico.org.uk).

13. Changes to this privacy notice

We may change, modify, add or remove portions of this policy at any time, and any changes will become effective immediately. Any changes we make to our privacy policy will be posted on this page and, where appropriate, notified to you.