
REAL RENTS PROPERTY MANAGEMENT LTD

PRIVACY NOTICE

BACKGROUND:

Real Rents Property Management Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our landlords, tenants and contractors and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Real Rents Property Management Ltd

Registered in England under Company Number 08567469

Registered address: 232 Whaddon Way, Bletchley, Milton Keynes, MK3 7DE

Main trading address: 232 Whaddon Way, Bletchley, Milton Keynes, MK3 7DE

VAT number: N/A

Data Protection Officer: Nikunj Patel

Email address: info@realrents.co.uk

Telephone number: 01908 465130

Postal Address: 232 Whaddon Way, Bletchley, Milton Keynes, MK3 7DE

We are a member of The Property Ombudsman & Client Money Protect

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.

- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us:

- Identity and personal contact details, such as your name, title, address, email address, telephone number, date of birth, national insurance number, car registration, passport number;
- Background information such as previous landlord details, employer details, accountant details, next of kin, dependants and emergency contacts;
- Bank account details, bank references and credit check results;
- Tenancy details including renewals, joint tenants, other residents and guarantors;
- Tenancy deposit information (if any) including return on tenancy termination;
- Immigration/right to rent checks (*England only*);
- Rent and utilities payment records;
- Recovery of arrears, claims or possession proceedings;
- Repair and health and safety records;
- Breach of tenancy terms/complaints
- Council Tax and utilities records;
- Universal credit/housing benefit records;
- Notices and correspondence regarding termination of tenancy;

- CCTV and audio recordings (if any); and
- General correspondence in all formats (letters, emails, text messages etc).

We may also collect, store and use the following special categories of more sensitive personal information:

- Information about medical or health conditions, including whether or not you have a disability for which we to make adaptations; and
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

We collect this information in a variety of ways. For example, data is collected through the tenancy application process and through correspondence during the tenancy. We also generate our own records such as rent payment records.

In some cases, we collect personal data about you from third parties, such as:

- References supplied by former landlords, employers and personal referees;
- Information from credit reference agencies;
- Other tenants, residents or neighbours;
- Guarantors;
- Local authorities;
- The police or other law enforcement agencies;
- Department for Work and Pensions
- Utility companies or service providers;
- Letting/managing agents; and
- Websites or online rental portals such as Rightmove.

Data is stored in a range of different places, including in paper files and in our online IT systems (including the our email system).

6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

- To verify the identity of a proposed tenant/resident;
- To decide on the suitability of a proposed tenant/resident;
- To assess the financial standing/suitability of a proposed tenant/resident;
- To check immigration status/right to rent;
- To deal with joint tenants and residents who are linked to the tenancy;
- To enter into a tenancy agreement
- To secure payment of rent and performance of tenant obligations;
- To collect rent and other payments;
- To manage the tenancy and the property;
- To keep accurate records relating to the Landlord's rental business;
- To arrange repairs and maintenance of the property;
- To monitor and enforce performance of tenant's obligations;

- To recover debts and/or obtain possession of a property;
- To ensure Council Tax and utilities charges are billed and paid appropriately;
- To ensure that welfare benefits (such as Universal Credit and housing benefit) are paid to the landlord or tenant where appropriate;
- To handle tenancy termination and the return of any tenancy deposit;
- To handle complaints;
- To address health and disability issues relating to tenants/residents;
- To create and keep audio and CCTV recordings;
- To provide information to public or local authorities who are legally entitled to require this information;
- To contact next of kin or close relatives in case of emergency;
- To store of emails, records of calls and other communications;
- To comply with legal and regulatory requirements;
- To bring and defend legal claims; and
- To prevent, detect and investigate crime and anti-social behaviour.

7. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

We will only hold your personal data for as long as is necessary to fulfil the purposes we collected it for, including any legal, accounting or reporting requirements. The period for which your data is held after the end of a tenancy is seven years. The period for which your data is held following an unsuccessful tenancy application is one year.

8. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar levels of data protection to those in Europe. More information is available from the [European Commission](https://europeancommission.eu).

Please contact us using the details below in Part 11 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Use cloud-based lettings management software with high levels of security.
- Ensure all computers and electronics devices have a login feature which is used.
- Data is stored on cloud drives with high levels of security and not on local desktop computers.

9. Do You Share My Personal Data?

Your information will be shared internally, including with all members of staff.

We also share your data with third parties where required by law, where it is necessary in order to administer the relationship with you or where we have another legitimate interest in doing so. Information can be shared with:

- Professional advisers, including solicitors and accountants;
- Letting/managing agents;
- Freeholder and/or their managing agent (for property in block of flats);
- Existing or previous landlords;
- Existing or previous employers;
- Credit referencing agencies;
- Debt collectors and tracing services;
- Local authorities and government/public bodies;
- Ombudsman/redress schemes;
- Professional body/regulator;
- Courts/Tribunals;
- Police/enforcement agencies;
- Internet service providers;
- Banks/building societies;
- Tenant's/resident's next of kin or close relatives in case of emergency;
- Joint tenants and other residents;
- Guarantors;
- Tenancy Deposit Schemes;
- Universal Credit/housing benefit/other benefit administrator;
- HM Revenue and Customs;
- Council Tax authority;
- Contractors and tradespeople providing services at the property;
- Prospective purchasers of property;
- Other landlords including where you apply to another landlord for a tenancy; and
- Utility companies including electricity, gas and water suppliers as well as companies providing telephony and internet services.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within less than one month and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Nikunj Patel):

Email address: info@realrents.co.uk

Telephone number: 01908 465130

Postal Address: 232 Whaddon Way, Bletchley, Milton Keynes, MK3 7DE

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website www.realrents.co.uk.