Fair Processing Notice: Greenfinches Groups Ltd

(Created May 2018)

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

Who are we?

Greenfinches Groups Ltd, whose main office is located at 71 Ramsgate road, Margate, Kent. CT9 5SA Tel: 01843 280111. We own rental properties in the residential market.

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number ZA411002 and we are the data controller of any personal data that you provide to us.

Our Data Protection Ambassador is Carly Lines.

Any questions relating to this notice and our privacy practices should be sent to Greenfinches Groups Ltd, 71 Ramsgate road, Margate Kent. CT9 5SA

How we collect information from you and what information I collect

We collect information about you:

• From your application for accommodation

We collect the following information about you:

Tenant name, e-mail address, telephone number Date of Birth, address (including any previous addresses), marital status, National Insurance Number, nationality, next of kin, name of university or college where you are studying (if applicable), the name of friends that you are staying with (if applicable);
Guarantor name, e-mail address, telephone number, Date of Birth, address (including any previous addresses), marital status, National Insurance Number, nationality, next of kin (if applicable);

• Property address; term, rent, deposit, utility and service responsibilities;

• The employment status of tenants and/or guarantors, address, contact details (including email, phone and fax numbers) of the employer/accountant, payroll numbers, length of employment, salary information (including any regular overtime or commission), and any other income received;

• Bank account details of the tenant, including account number and sort code,

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• Any welfare benefits that you may be eligible for, or are currently on.

We operate a CCTV system at our 71 Ramsgate Road, Margate office premises for the detection and prevention of crime. It operates continuously and recordings are held for one month.

Why we need this information about you and how it will be used

we need your information and will use your information:

• to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;

• to enable us to supply you with the services and information which you have requested;

• to help you to manage your tenancy;

• to carry out due diligence on any prospective tenant, including whether there is any money judgements against them, or any history of bankruptcy or insolvency;

• to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;

• to contact you in order to send you details of any changes to our or supplies which may affect you; and

• for all other purposes consistent with the proper performance of our operations and business.

Sharing of Your Information

The information you provide to us will be treated by us as confidential and will be processed only by us, within the UK/EEA, we may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

• To carry out due diligence on you as a prospective tenant/ guarantor, including but not limited to the carrying out of affordability checks, due diligence checks and the obtaining of references from relevant parties, whose data you have provided;

• If you request so, your information shall be disclosed in order to determine if there are any money judgements against you, as the prospective tenant/guarantor, or to determine if they have a history of bankruptcy or insolvency;

• If you are unable to make payments under your tenancy, your information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you as a tenant; and

• In the creation, renewal or termination of the tenancy, your information will be disclosed to the relevant local authority, tenancy deposit scheme administrator, service/utility provider, freeholder, factor, facilities manager or any other relevant person or organisation in connection with this.

• Greenfinches Groups Ltd share limited data with contractors who are carrying out services on our behalf. Our contractors are required to comply with the law and our own Data Processing Agreement to ensure data is managed appropriately and for specific purposes, such as repairs or out of hour's emergencies.

• Greenfinches Groups Ltd may need to share personal information with Government departments and agencies, with our accountants, utility companies, and we may also provide limited data to surveyors, solicitors, agents and valuers, relating to a property sale.

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How we will communicate with you.

Greenfinches Groups Ltd need to communicate with our tenants, and this will usually be in writing or by telephone, but is more commonly becoming electronic and paperless. We will only discuss or communicate with those named on your tenancy or lease/licence or authorised by those named on the tenancy. You can authorise someone temporarily/permanently in writing

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to me/ us without your consent.

What we will not do.

- We will not send you unsolicited Marketing Material
- We will not sell your personal data onto third parties.
- We will not pass your data onto unrelated third parties unless where we are required to do so by law or have your explicit permission to do that.

Transfers outside the UK and Europe

Your information will be stored inside the UK and on a password encrypted cloud storage software.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe.

Your details are held on our password encrypted computer, paper copies of all necessary documents are locked in our filing system, which is situated in an office which has an alarm system and has 2 separate locks on each door.

How long we will keep your information

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law we may be legally required to hold some types of information, this being one year from the conclusion of a tenancy or licence.

Your Rights

You have the right at any time to:

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• Ask for a copy of the information about you held by us in our records, we reserve the right to make a charge of £10 to administer this request.

- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of yours we hold;
- If you would like to exercise any of your rights please contact the office or email:

properties@greenfinches.co.uk

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the Information Commissioner's Office in relation to my/ our use of your information. The Information Commissioner's contact details are noted below:

England:

Information Commissioner's Office Wycliffe House, Water Lane Wilmslow, Cheshire, SK9 5AF Telephone: 0303 123 1113 Email: <u>casework@ico.org.uk</u>

Scotland:

The Information Commissioner's Office – Scotland 45 Melville Street, Edinburgh, EH3 7HL Telephone: 0131 244 9001 Email: Scotland@ico.org.uk

Wales:

Information Commissioner's Office 2nd floor, Churchill House Churchill way, Cardiff, CF10 2HH Telephone: 029 2067 8400 Email: <u>wales@ico.org.uk</u>

Northern Ireland:

Information Commissioner's Office 3rd Floor, 14 Cromac Place Belfast, BT7 2JB Telephone: 028 9027 8757 Email: <u>ni@ico.org.uk</u>

The accuracy of your information is important to me - please help us keep our records updated by informing us of any changes to your email address and other contact details.