

Goodge Property Services Limited Privacy Notice

Goodge Property Services is committed to protecting and processing your personal data whilst providing a personalised and valuable service.

Any information is gathered and processed in accordance with this privacy policy and in compliance with the UK General Data Protection Regulations and the Data Protection Act 2018.

The UK General Data Protection Regulations are to safeguard your personally identifiable information or personal data.

This policy provides you with the necessary information regarding your rights and our obligations, and explains how, why, and when we process your personal data. This policy notice will be reviewed and regularly updated.

Who We Are

Goodge Property Services is a company registered in England and Wales under the company number **14425944**.

Our registered office is at **19 Upper King Street, Norwich, Norfolk NR3 1RB**

The Information Commissioner's Office (ICO) registration number **ZB579494**

Goodge Property Services act as the Data Controller when collecting and processing your data but we may be required to act as a processor in some instances.

We can be contacted at tim@goodgepropertyservices.co.uk

What is Personal Information?

Personal information is anything that provides information about you. This could include information such as name, contact details, date of birth, bank account details or any information about your needs or circumstances which would allow us to identify you.

Some personal information can be classified as "Special Category Data" under data protection legislation. This information is of a more sensitive nature, and we need further justification under the Data Protection Act 2018 to collect, process and store such data. Examples of Special Category Data include information relating to health, racial or ethnic origin, religious beliefs, political opinions, and sexual orientation.

There are also additional restrictions on the circumstances where we are permitted to collect and use criminal convictions.

We will only process special categories of personal information and criminal convictions with your explicit consent. We will inform you of the purpose for which such information will be used at the point of where we ask for your consent.

Personal Information We May Collect Directly

We will collect your full name and necessary contact details (such as phone number, email address and postal address) from you whenever you engage with us, either via our website, when you provide it directly, publicly available sources (Companies House, Land Registry, Electoral Roll) online property portals (Rightmove, Zoopla) social media & networking sites (Facebook, Instagram) and from third parties (Referencing Agencies, Employers, Banks)

In addition, depending on the service that we provide to you, or on your behalf, we may need to also collect additional personal information and the reasons why, details of which can be found below.

If we require additional information which is not listed below, we will always tell you the reason why.

Name, Address, Telephone Number Email Address, Previous name & Address,	To fulfil our obligations to landlords, prospective tenants & tenants in the letting, management & maintenance of the property. Legal Bases - where we need to protect your interests, someone else's interest or where it is needed in the public interest or for official purposes. To obtain references, verify identity.
Specific Access Requirements	To assist us with finding a property suitable for your needs.
Proof of identity, may include but not limited to: Passport, Driving Licence, Address Documentation, Biometric Residence Card, Immigration Status, Birth Certificate, Utility Bill	To carry out referencing & credit checks & verify identity. Such data will be shared with a third-party referencing agency for the purpose of prevention & detection of crime, fraud, money laundering & checking your suitability to rent the property.
Marital Status, Date of Birth, Nationality, Bank Details, National Insurance Number, Credit History Facial Verification Technology	To deliver Client ID verification checks. In some circumstances, the third-party referencing agency may act as the data controller for your information. To fulfil our legal obligations.
Bank Details- Landlord / Tenant / Guarantor Bank Details – Landlord / Tenant / Guarantor	To set up rental payments & service charge payments To arrange onward payment of rent due to you
Financial information such as bank statements, pay slips, company accounts	As evidence to support your ability to act as a guarantor
Name, address, telephone number, email address Previous Name & Addresses Proof of identity, may include but not limited to: Passport, driving licence and address documentation, biometric residence card, immigration status document and/or birth certificate, utility bill Credit history	To carry out regulatory checks to prevent fraud, money laundering, tax evasion and unauthorised transactions for: "Know Your Client" checks Due Diligence checks Anti-money Laundering Checks Counter Terrorist Financing Checks Right to Rent Checks To carry out Guarantor referencing and affordability checks

Information on other individuals who have an interest in the rental property, but who are not clients Entities (Company, Trust or Charity) Personal information of beneficiaries of the entity and those in a position of control may include but no limited to: identity and address documents	To fulfil our legal obligations
Property details: floor plans, photographs, energy performance certificate, gas & electric safety certificates, marketing reports	To allow us to deliver our management and letting services to you when we let out your property on your behalf, including advertising your property To record the condition of the property To fulfil our legal obligation
Utilities & local councils Meter readings at the start & end of the tenancy	To allow us to liaise with utility companies and local authorities regarding property services

How We Use Your Personal Information

Under data protection legislation we are only permitted to use and process your personal information if we have a legal basis for doing so.

Processing personal data includes recording, storing, altering, using, sharing or deleting data. The legal basis for how we process your information include:

- Consent: Consent may be requested in certain cases, e.g. to obtain a reference. Where we process personal information under consent, we will seek to obtain your clear consent before processing the data. For example, sending or receiving marketing information
- Contractual Fulfilment: To perform our contract so that we can carry out our responsibilities under the lease agreement with you, including anything you request us to do with a view to you becoming a tenant or landlord.
- Legal Obligation: Compliance by us with a statutory or other legal obligation. For example, verification of identity and anti-money laundering.
- Vital interests: For example, if there is a life-threatening situation.
- Legitimate Interest: It may be necessary to process personal information for us to carry out our activities for which it is in our legitimate interest (or those of a third party) For example, updating tenant/landlord details, outsourcing services to third parties who are specialised in network and information security in order for us to take the steps to protect your information against loss, theft or unauthorised access.

This however will not apply if our interests are overridden by your interests or your fundamental rights and freedoms.

Some examples of how we use your personal information:

To provide a property management service for tenants, prospective tenants and landlords

To provide full property management and maintenance services

For administrative and business purposes

In connections with our legal rights and obligations

To carry out regulatory checks to prevent money laundering, fraud, unauthorised transactions, tax evasion etc.

To carry out tenant referencing and credit reference checks

To carry out guarantor referencing and affordability checks

To process payments of rent ,service charges and maintenance for you if a property is being let

To arrange an energy performance certificate / Gas safety / Electrical Safety Certificates
To complete commercial inspections
To liaise with utility companies and local authorities regarding property services if required
To notify you of any change to our services
To assist with any insurance claims against the property

Who We Share Your Personal Information With

To provide you with our services, it will be necessary to engage and share some of your personal information with third party service provider. We will only provide them with the minimum personal information required for them to fulfil their services and ensure they are aware of the requirements relating to information privacy.

We share data to the following types of company for the following purposes:

- Providers of Tenant Referencing – to obtain references, check creditworthiness, prevent money laundering & fraud
- Solicitors – to pursue a claim for breach of lease agreement
- Other Parties to the Contracts and or their Legal Representatives – in relation to lease agreements
- Website Hosting Companies - for website hosting
- Accountancy Firms / Software - to fulfil our contracts for accounting services
- Debt Recovery Firms - for debt recovery
- Law enforcement Bodies – Police, HMRC, Local Councils to comply with legal obligations
- Utility Companies / Local Council Authority - for the transfer of utilities on a property and payment of bills
- Contractors - for necessary maintenance and safety certificates
- CEDR: Centre for Effective Dispute Resolution– where they are providing a dispute resolution service
- The Financial Ombudsman Service – if they require information to investigate a complaint.

Retention Period

We will keep your information for as long as is necessary for the purposes set out in this privacy notice and to fulfil our legal and regulatory obligations.

We will hold personal data about you for the duration of your lease and for 7 years after your lease has ended for possible tax enquiries and financial auditing purposes.

This is the statutory limitation period of 6 years plus a further year to allow for service of proceedings should proceedings commence later.

Please email: tim@goodgepropertyservices.co.uk to request further information regarding our Data Retention Policy Schedule.

Your Rights

- **Your right of access** – you have a right to ask for copies of your personal information. However, due to exemptions within the legislation, we may not be able to provide you with all the information we process. We will provide you with an explanation if this is the case. We are obliged to respond to an access request within 30 days and may not charge a fee unless the request is unfounded, excessive or repetitive. If a fee is charged, it is to be a reasonable fee based upon the administrative cost of providing the information.
- **Your right to rectification** – you have the right to request that inaccurate information is rectified and incomplete information completed. If your data has been disclosed to third parties, then we must inform them of the rectification where possible.
- **Your right to erasure** – you have the right to request your personal information be deleted by us in certain circumstances:
 - If we continue to process your personal information for longer than the agreed period, it was necessary or for the purpose it was collect
 - If the personal information has been processed unlawfully
 - When we rely on consent as the legal basis for processing and consent has been withdrawn
 - It is necessary to delete any personal information to comply with legal obligation
 - We will comply with your request unless we have another basis of processing justifying our retaining the data such as a legal requirement or the defence of a legal claim.
- **Your right to restrict processing** – you have some rights to ask us to restrict the processing of your personal information in certain circumstances such as:
 - 1) The data may be incorrect and while accuracy is verified
 - 2) Our processing of your personal data is unlawful
 - 3) Where you have raised an objection to our use of your personal information
 - 4) Where your personal information is longer required but you require us to keep it to enable you to establish or defend a legal claim
- **Your right to object to processing** – you have the right to object to the processing of your personal information in certain circumstances. We may be required to stop processing unless there is a legitimate basis of processing such as a legitimate interest

or a requirement for the exercise or defence of a legal claim

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure. A record of this request and our response will be retained for 7 years as a legal requirement.

If You are Unable to Provide Any Information Requested

To perform and fulfil our services, and to comply with our legal obligations, we will require certain details relating to your personal information to facilitate this process.

For example, requesting identity documentation from you to meet our money laundering and fraud legal obligations. You are not obligated to provide your personal information to us, however, if such information cannot be provided, we will be unable to fulfil our contract and provide you with our services.

Transferring Data Outside of the UK

The information which you provide to us may be transferred to countries outside the United Kingdom ("UK") if any of our servers or our processors' servers are located outside the UK. Countries outside the UK and countries within the European Free Trade Area (EFTA") may not have equivalent information protection laws to those within the UK.

We do our best to protect your personal data, but we cannot guarantee the security of your data transmitted to our site, any transmission is at your own risk. Once we receive your information, we use strict procedures & security features to try to prevent unauthorised access.

By submitting your personal information, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the UK or EFTA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

Online Identifiers, IP Addresses & Cookie Identifiers

When you visit our website, we may collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns.

We may obtain information by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service and enable us to:

To estimate our audience size and usage pattern.

To store information about your preferences, and so allow us to customise our site according to your individual interests.

To speed up your searches.

To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site. You can find more information about cookies at www.allaboutcookies.org

Links to Other Sites

This policy only applies to our site. If you leave our site via a link or otherwise, you will be subject to the privacy policy of that website provider. We have no control over that privacy policy or the terms of the website and you should check their privacy policy before continuing to access the site.

How we Keep Your Information Secure

The security of information is very important to us, and we have measures in place designed to prevent unauthorised access to your personal information. These measures include but not limited to:

Client files are stored and access is restricted on our client system to those within the business who are required to have access to your information for legitimate business interests.

Any hard copy material is stored in locked filing cabinets.

Withdrawal of consent

Where the lawful basis for processing is your consent, you may withdraw consent at any time by writing to:

Goodge Property Services at Woodton Grange, Norwich Road, Woodton, Bungay, Norfolk, NR35 2LP or emailing:
tim@goodgepropertyservices.co.uk

Your Acceptance

By using our website or services, registering with us as an applicant either as a potential Landlord or Tenant, you consent to the collection and use of information by Goodge Property Services in accordance with our privacy policy.

If you do not agree to this policy, please do not use our site or our services

How to Lodge a Complaint

If you have any complaints about the way we use your personal data please contact tim@goodgepropertyservices.co.uk

If we cannot resolve any issue, you have the right to complain to the Data Protection Authority:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow SK9 5AF

Telephone: 0303 123 1113 (*local rate*) or 01625 545 745 (*national rate*)

Fax: 01625 524 510

Email: enquiries@ico.org.uk or by using the form on the website ico.org.uk or the live chat function

This privacy notice will be regularly reviewed and updated.