

DATED

21<sup>ST</sup> MAY

2018

**PRIVACY NOTICE PROVIDED BY PROPERTY INITIATIVES MANAGEMENT LTD**

**Relating to**

Its delivery of

Residential Property Management services/  
Residential Property Services

8 Queen Street  
Queens House, 5th floor  
London  
EC4N 1SP



This Privacy Notice explains what personal data (within this document personal data is termed personal information) we hold about you/your organisation, how we collect it and how we use it. It also covers how we may need to share information about you/your organisation and with whom during our involvement with you delivering Residential Property Management services/ Residential Property services and what we do with this information after/ Should our involvement with you/your organisation end.

We are required to issue you with this Privacy Notice under the requirements as set out in the General Data Protection Regulation, hereafter on occasion referred to as GDPR.

Please ensure you read this Privacy Notice and any other similar Notices we may provide to you from time to time when we collect or process personal information about you/your organisation. This privacy Notice contains important information on who we are, how and why we collect, store, use and share personal information, You/your organisations rights in relation to you, your organisations personal information and on how to contact both ourselves and the relevant supervisory authority in the event you have a complaint.

#### **1. WHO WE ARE**

Property Initiatives management Ltd uses and is responsible for certain personal information that it holds about you/your organisation. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as the 'Controller' of that personal information for the purposes of those laws.

In this Privacy Notice, references to 'we' or 'us' means Property Initiatives Management Ltd.

#### **2. GDPR PRIVACY PRINCIPLES**

We will comply with the data protection principles when gathering and using personal information, as set out in our GDPR data protection policy.

#### **3. THE PERSONAL INFORMATION WE COLLECT AND USE: INFORMATION COLLECTED BY US**

In the course of delivering our Residential Property Management Service(s) / Residential Property Service(s) for our clients, landlords, freeholders, long leaseholders, tenants and licenses, we collect the following personal information when you/ your organisation or they provide it to us:

- Your name/ the name of organisation, correspondence address (which may or may not be your home address), address of the property to which our service(s) relate which may or may not be the same as previously stated, your email address and telephone contact details.

The provision of the above stated personal information is required from you/your organisation to enable us to perform against our contract/ Management Agreement with regards to Residential Property Management service(s) Residential Property Service(s) for you/your organisation.

We will inform you at the point of collecting information from you/your organisation, whether you/your organisation is/are required to provide the information to us.

#### 4. THE PERSONAL INFORMATION WE COLLECT AND USE: INFORMATION COLLECTED FROM OTHER SOURCES.

We also obtain personal information from other sources as follows:

- We receive personal information as part of handover for new Management Instructions from the former Managing Agents, Accountants, Solicitors or the client directly.
- We receive personal information on sale or purchase or assignment of properties and leases from former Managing Agents, Accounts, Solicitors or the client directly.
- Managing agents of leaseholders or freeholders who let their flats.
- On a needs basis Bank References, Personal References and Trade References as authorised by you.

#### 5. HOW WE USE YOUR PERSONAL INFORMATION

We will typically collect and use the personal information we collect from you/your organisation for the following purposes:

- For the performance of a contract/ Management Agreement we have with you/your organisation as our client or where you are a Tenant of our client

(and/or)

- For the purposes of our legitimate interests or those of a third party, **but only if these are not overridden by your interests, rights or freedoms.**

We seek to ensure that our information collection and processing is always proportionate to the service(s) we are providing.

We will notify you of any material changes to personal information we collect or regarding any change to the purposes for which to collect and process it.

#### 6. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share the following categories of personal information:

- Your name/ the name of your organisation, correspondence address (which may or may not be your home address), address of the property to which our service(s) relate which may or may not be the same as previously stated, your email address and telephone contact details.

This personal information may be shared with the following categories of recipients:

- Accountants, solicitors and other relevant professionals, our client, Property Insurers, Local Authorities, Professional Body (RICS), Our of Hours Providers, Joint Agents, Approved Contractors, and Fire Officer.

This information sharing enables us to perform against our contract/ Management Agreement.

Some of those third party recipients may be based outside the European Economic Area- For further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA' .

We will not share your personal information with law enforcement or other authorities if required by applicable law.

We will not share your/your organisations personal information with any other third party except in the instance of those stated above.

## **7. WHERE YOUR PERSONAL INFORMATION MAY BE HELD**

Personal information may be held at our offices and third party agencies, service providers and any other organisations (representatives and agents) as described above.

We have security measures in place to seek to ensure that there is appropriate security for personal information we hold including those measures detailed in our GDPR data protection policy.

## **8. HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT**

We will only hold the range of personal information we keep on you/ your organisation which covers your name/ the name of your organisation, correspondence address (which may or may not be your home address), address of the property to which our service(s) relate which may or may not be the same as those previously stated, your email address and telephone contact details for as long as we need it and in line with appropriate legal and financial requirements which is for 7 years.

## **9. REASONS WE CAN COLLECT AND USE YOUR PERSONAL INFORMATION**

We rely on the contract/ management Agreement we have with you/ your organisation as the lawful basis on which we collect and use you/ your organisations personal information.

## **10. TRANSFER OF YOUR INFORMATION OUT OF THE EEA**

We may transfer your personal information to the following which are located outside the European Economic Area (EEA) as follows:

- United States of America in order to back up your data held in our property management system in recognised data centres

Such countries do not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision that the United States of America provide an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal information will be subject to the EU-US Privacy Shield Framework: this is as permitted by the European Commission who on 12<sup>th</sup> July 2016 deemed the EU-U.S. Privacy shield Framework adequate to enable data transfers under EU law. As such this EU-US Privacy Shield complies with the General Data Protection Regulation that is designed to help safeguard your

privacy rights and give you remedies in the unlikely event of a misuse of your personal information. To obtain a copy of the privacy shield details and its safeguards, please go to [www.privacyshield.gov](http://www.privacyshield.gov)

If you would like further information please contact our Data Protection Officer as outlined in How to contact Us below.

Please note, we will not otherwise transfer your personal data outside of the United Kingdom or EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

## 11. YOUR RIGHTS

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- Fair processing of information and transparency over how we use your personal information
- Access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- Require us to correct any mistakes in your information which we hold
- Require the erasure of personal information concerning you in certain situations
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- Object at any time to processing of personal information concerning you for direct marketing
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- Object in certain other situations to our continued processing of your personal information
- Otherwise restrict our processing of your personal information in certain circumstances
- Claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK information Commissioners office (ICO) on individuals right under the General Data Protection Regulation.

If you would like to exercise any of the above stated rights, please:

- Email Call or write to us as follows (See below)

[Officeadmin@propertyinitiatives.co.uk](mailto:Officeadmin@propertyinitiatives.co.uk)

Phone: 0207 329 6666

Address:

Property Initiatives Management Ltd  
8 Queen Street  
Queens House  
5<sup>th</sup> Floor  
London  
EC4N 1SP

- Let us have enough information to identify you so your full name, postal address, the address of the property that we have acquired for you/ are managing for you etc,
- Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- Let us know the information to which your request relates, including any account or reference numbers, if you have them

## **12. KEEPING YOUR PERSONAL INFORMATION SECURE**

We know that keeping your information safe is vital and to this end we promise to collect, process, store and share your information safely and securely.

To enable us to do this. We have appropriate security measures in place to prevent your/your organisations personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your organisations personal information to those who have a genuine business need to know it. Those processing your organisations information will only do so in an authorised manner and they are subject to a duty of confidentiality and will follow our GDPR policies and procedures.

We also have procedures in place to deal with any suspected data security breaches. We will notify you and any Applicable Regulator of any suspected data security breaches where we are legally required to do so.

### 13. HOW TO COMPLAIN

We hope that we can resolve any query or concern you raise about our use of your/your organisations personal information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The Supervisory authority in the UK is the information commissioner who may be contacted at <https://ico.org.uk/concerns/>, by telephone on 0303 123 1113

Or by writing to them at:

Information commissioner's office  
Wycliffe House  
Walter Lane  
Wilmslow  
Cheshire  
SK9 5AF

### 14. CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice was published on 21<sup>st</sup> May 2018 and will be updated as a minimum on an annual basis or as the requirements of GDPR Changes.

Should we change or amend this Privacy Notice, we will inform you.

### 15. ADDITIONAL HELP

If you would like this privacy notice in another format, for example in audio, large print etc then please contact us as stated above in section 11.

