

WESTERN PERMANENT PROPERTY LTD  
also known as  
WESTERN PERMANENT PROPERTY  
(the 'Company')  
GENERAL DATA PROTECTION REGULATION  
(‘GDPR’)  
PRIVACY POLICY

Your privacy is extremely important to us so we want you to know exactly what kind of information we hold about you and how we use it. This Privacy Policy establishes how the Company uses and protects any information provided to it in order to carry out its contractual duties as a Managing Agent.

This Policy is dated 17<sup>th</sup> May 2018 and will be reviewed in May of each subsequent year.

**1. WHO WE ARE**

The Company collects, uses and is responsible for certain personal information. 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 ‘controller’ of that personal information for the purposes of those laws.

In this Policy, references to “we” “our” or “us” means the Company.

**2. DATA PROTECTION PRINCIPLES**

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

**3. THE PERSONAL INFORMATION WE COLLECT AND USE: INFORMATION PROVIDED TO US FROM YOU**

In the course of Property Management we may collect the following personal information when it is provided to us:

Name or company name (if applicable), address, landline and/or mobile telephone numbers, alternative contact details, fax number, email address, date of birth, nationality, occupation, bank details, credit/debit card information, mortgage details and car registration. The Company will assume that consent has been obtained for the Company to hold and process personal information when it has been given personal information of another person.

The provision of personal data (as above) is required to enable us to perform our contract as a Managing Agent.

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

We also obtain personal information from other sources as follows:

Your name or company name (if applicable), address, landline and/or mobile telephone numbers, alternative contact details, fax number, email address, mortgage details, car registration from solicitors, mortgage lenders, Notice of Transfer, Land Registry, DVSA, local authorities, property developers, managing agents, letting agents, ground landlords, management companies, housing associations and a controlling party of the development.

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

We will typically collect and use this information for the following purposes:

- For performing the terms of the contract that we have for a development where we have been appointed Managing Agent.
- To notify you about changes to our service and/or our obligations
- To provide you with information, products and services that you request from us

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.

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

The Company commits to keeping your personal information confidential and safe however in the course of carrying out our management duties we may be required to share some if not all the personal information that you have provided to us or that we have collected.

Personal information may be shared with the following categories of recipients but their use of such information shall be limited to their duties in relation to the Company carrying out its obligations under its contract:

- Company employees, contractors and agents
- Caretakers and concierge
- Insurance – Insurance providers, insurance brokers and loss adjustors
- Ground Landlords
- Directors of the management company (if applicable)
- Accountants/Auditors
- Legal Professionals – solicitors, barristers, debt collectors, Land Valuation Tribunal/First Tier Tribunal (if required)
- Information technology – IT consultancy, software providers, website consultancy, website hosting (UK), email cloud hosting (UK) and CCTV monitoring.
- ARMA/RICS/Ombudsman
- Local Authorities
- Letting Agents
- New managing agents, management companies, housing associations
- Emergency Services
- DVSA

This data sharing enables us to perform our contract as managing agent.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share personal information with any other third party other than is required by law or as set out in this privacy policy.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. Unfortunately, the sending of information via the internet is not completely secure and is therefore sent at your risk.

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

Information may be held at our offices and third party agencies, service providers, representatives, company laptops with remote access, mobile telephones, computer tablets and agents as described above.

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

Or, for example, a set number of years after a data subject ceases to be a lessee in that development.

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

We will hold your personal information for six years.

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

We rely on contract as the lawful basis on which we collect and use your personal data.

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

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

#### **11. COOKIES**

Our website, like most others, uses cookies which are small files that a site or its service provider transfers to your computer's hard drive through your web browser to store and retrieve a modest amount of information. This information is not personally identifiable to you but is used to make sure that the site works as it should and that it is easy to access and navigate.