

## GDPR Privacy Policy

### Introduction

Action Property Management use certain elements of your personal data to provide our services to you. In this Privacy Policy, we describe how we collect, store and use your personal data. We take every care to protect your personal data and your privacy during this process in accordance with all relevant legislation. There are steps you can take to control what we do with your personal data and these are explained in the policy.

By personal data, we mean data which could be used to identify you, including your name and contact details, and any related data which could be attributed to you. It may also include information about how you use the services we offer.

### Who is responsible for your data

Action Property Management is responsible for your personal data on behalf of our client (Residential Management Company). Our registered address is No. 1, Dock Street, Leeds, LS10 1NA. We are registered as a company in England and Wales under company number 6340305. We are the data controller of the personal data which we collect from you, and so we are responsible for the ways your personal data are collected and the purposes for which your personal data are used.

### How we protect your data

We use encryption and password protection to protect your data and the systems they are held in. We also use operational measures to protect the data by limiting the number of people who have access to your personal data.

We keep these security measures under review and refer to industry security standards to keep up to date with current best practice.

All our data processing is undertaken within the UK - European Economic Area (EEA). Our data is backed up outside the EEA using Mozy online backup which is owned by Del. We ensure that any data that is processed outside of the EEA adheres to the same security standards as that processed inside the EEA. A statement from Mozy on their compliance with GDPR can be found on [www.mozy.co.uk](http://www.mozy.co.uk)

## What personal data we collect from you

Depending on how you use our services, we may collect any of the following personal data from you:

<b>Type of personal data</b>	<b>Places where these may normally be collected</b>
Your name and contact details (email address, telephone number, address)	<p>When you make an enquiry about the services which we offer.</p> <p>When you purchase or rent a property within one of the residential developments we are appointed as managing agent.</p> <p>When you complete a resident information form.</p> <p>When you contact us about a problem such as a maintenance issue (i.e. leak) / noise.</p> <p>When you request a service from us such as cycle parking or meter read.</p>
Communication we have with you (emails, letters, telephone calls, messages sent to us, feedback)	<p>When you get in touch with us</p> <p>When you respond to our requests for feedback</p>
Information about your activities at the developments we manage	<p>We use CCTV in and around our sites for security. All data is deleted after one month unless requested by the police for legal reasons.</p>
Bank / Payment card details	<p>When facilitating payments. Note we do not hold any bank card details. All card transactions are processed securely by HSBC / Global Iris</p>

We may also collect very limited amounts of more sensitive personal data for your safety. For example information on a disability which may require you to be rescued from your apartment in the event of an emergency.

Please see the information below on how we use and protect all of your personal data, including sensitive data.

### How we use your personal data

We can only use your personal data if we have a valid reason (or "lawful basis") for doing so. The law defines a number of possible reasons, of which the following four apply to our use of your data:

- To fulfil a contract we have with you
- When you consent to it
- If we have a legal obligation to use your data for a particular reason
- When it is in our legitimate interests

In cases where we have chosen "legitimate interests", we will give you further information on what these interests are and why the processing of your data is necessary to achieve this. If we choose this basis, we will have ensured that we have balanced our interests against yours and believe that you would reasonably expect us to use your data in this way.

You can find detail on the different ways in which we use your personal data, and the reasons for doing so, below.

<b>What we use your personal data for</b>	<b>Lawful basis</b>	<b>Our legitimate interests</b>
To respond to your enquiries or requests	Legitimate Interests	As you have made an enquiry with us, we need to respond to this enquiry
To facilitate the management of your development (for example to send you an invoice for service charges / ground rent) or to notify you about management issues relating to your property	Contract	Not applicable
To give you further information about the services we offer	Legitimate Interests	We want you to have the best possible experience
To send you requests for feedback on your experience with us	Legitimate Interests	We continually strive to improve our services and need your input to do so
To meet certain legal responsibilities, e.g., collecting registration data or cooperating with police	Legal obligation	Not applicable
To combat fraud and manage risk for us and our leaseholders	Legitimate interests	We need to protect our business and our leaseholders
To respond to complaints and to seek to resolve  To investigate accidents and improve our processes for the future	Legitimate interests	We want to resolve complaints as best we can. We also want to improve processes and service levels for the future.

### How we work with Third Parties

We use a number of Third Party systems to collect and process your data for the purposes shown above. This includes the MyApartment website (which is developed and hosted by a Third Party), and our payment system provider. We ask that they follow the same rigorous data protection standards that we do.

We sometimes with your approval use personal data i.e. your name and contact number from Third Parties. Examples of this include letting agents who may be managing your property or sales agents who may be involved in the sale of your property.

**We will never sell, rent, loan or share your personal data with a third party for the purpose of marketing activity of any nature, unless you have provided us with explicit permission to do so.**

### How long we keep your data

We only keep your data only for as long as we need it. How long we need data depends on what we are using it for, as described above.

We will actively review the personal data we hold and when there is no longer a need for us to hold it, we will either delete it securely or in some cases anonymise it.

We destroy any paper copies of your personal data as soon as they have served their purpose (e.g., once information has been entered into a system). In the cases where we need to keep paper copies for longer, we ensure that they are stored securely and access is limited.

### Your rights

You have a number of rights with regard to your data, which include:

- The right to access your data
- The right to rectify your data, if you believe there is an error such as the spelling of your name
- The right to delete your data or restrict their use
- The right to object to the certain uses of your data

Should you wish to exercise any of these rights, please contact Action Property Management, No. 1. Dock Street, Leeds, LS10 1NA or e.mail

dataprotection@actionpropertymanagement.co.uk. We will deal with data access requests promptly and in any event within two weeks of receiving it, or (if later) from the day any information requested to confirm the requester's identity is obtained. In rare cases, when the request is particularly complex or numerous, this deadline may be extended by a further two weeks (in which case we will let you know within one week). This service is free, unless the request is manifestly unfounded or excessive.

If you have any further questions or complaints

Please contact Action Property Management at No. 1. Dock Street, Leeds, LS10 1NA or e.mail dataprotection@actionpropertymanagement.co.uk in the first instance. If you are not satisfied with the response that we give you, you have the right to complain to the Information Commissioner's Office (ICO), whose details can be found on [www.ico.org.uk](http://www.ico.org.uk)

Document Control

Author(s) Matthew Ward

GDPR Privacy Policy v1.0 Document produced 9<sup>th</sup> May 2018

Document approved and uploaded 22<sup>nd</sup> May 2018