

# SELECT PROPERTY MANAGEMENT LIMITED

## Privacy Policy

This Privacy Policy sets out what personal data we hold about you, the purpose for which your personal information may be used and details of third parties to whom your personal information may be disclosed.

### **Who we are**

Name: Select Property Management Limited

Address: 120 High Street, Amblecote, West Midlands, DY8 4DA

Phone Number: 01384277701

E-mail: [enquiries@selectsalesandlettings.com](mailto:enquiries@selectsalesandlettings.com)

Data Protection Registration Number: Z144300X

We provide estate agency services in the local area. Our registered office is 60a Manor Park, Kingswinford, West Midlands, DY6 4DA. We are committed to ensuring that your privacy is protected when personal information about you is provided to us. In this data protection statement when we refer to "we" or "us" we mean Select Property Management Limited

### **The type of personal information we collect**

We use different ways to collect data about you including the information you supply to us when using our services. If you fail to provide certain information, we may not be able to provide you with the service you require. The data gathered depends on whether you are purchasing, renting, selling, or letting a property through us, or purchasing, renting, selling or letting a property from one of our clients.

We currently collect and process the following information:

- Identity Data (name, marital status, title, date of birth, gender, username and password, purchases made by you, your interests and preferences, feedback, and survey responses)
- Contact Data (billing address, delivery address, email address and telephone numbers)
- Financial Data (bank account and payment details)
- Transaction Data (details about payments to and from you and other services you have purchased through us)

- Technical Data (internet protocol address, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, identification number, online identified, location data and other similar identifying information required for the customer's device(s) to communicate with websites and applications on the internet)
- Usage Data (how you use our website products and services, the full uniform resource locators clickstream to, through and from our site (including date and time), download errors, lengths of visit to certain pages, page interaction information, methods to browse away from the page and any phone numbers you use to call us)
- Marketing and Communications Data (your marketing preferences from us and our third parties and your communication preferences)

We also may collect and use Aggregated Data. For example, when you visit our website, we may aggregate data about your usage to tell us about how certain features on our website are used. This is not usually classified as personal data as whilst it derives from personal data (in the example, it is derived from your Usage Data) it does not reveal your identity to us. If we do link this Aggregated Data to your personal information, it will be treated as personal data in line with this policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can ask us to rectify or update your personal information at any time by email to [enquiries@selectsalesandlettings.com](mailto:enquiries@selectsalesandlettings.com) or by writing to Select Property Management Limited, 120 High Street, Amblecote, DY8 4DA.

## **How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you for one of the following reasons. This includes personal data you provide when you:

- apply for our services.
- subscribe to our service or publications
- request marketing to be sent to you
- contact us through social media
- walk-in to or telephone our office
- give us some feedback.

We also collect and receive data about you from third parties.

This may be information given to us by the landlord, other tenants or residents or neighbours. It can include information from a guarantor where there is a guarantor for your tenancy or from a joint tenant or other residents. Public bodies such as local authorities or the police, or other law enforcement agencies may give us information about you. This can include the Department for Work and Pensions or the local authority where you are receiving Universal Credit or housing benefit. Information may be given to us relevant to Council Tax by the local authority. Utility companies or service providers may also give us personal information about you. We obtain information about you when we carry out credit checks or take up references. We may also receive information from you via websites or from online rental portals such as Rightmove or On the market for example.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is:

- In our legitimate interests for ensure you are allowed to advertise, sell or rent out the property
- In our legitimate interests for deciding on the suitability of a proposed tenant/resident
- In our legitimate interests for verifying the credit worthiness/suitability of tenants/residents
- Our legal obligation to check immigration status/right to rent. This is also to verify identities.
- To perform our tenancy contract to deal with joint tenants and residents who are linked to the tenancy
- To perform our contract to complete the tenancy agreement
- In our legitimate interests to secure rental payments/performance of tenant obligations, e.g., deposits and guarantors

- For contractual performance for rent collection and collection of other payments including banking details
- For contractual performance for managing the tenancy and the property
- For contractual performance and/or in our legitimate interests for record keeping
- For contractual performance for arranging repairs, maintaining the condition of the property, and keeping it in a safe condition.
- For contractual performance for monitoring and enforcement of tenant responsibilities
- For contractual performance or in our legitimate interests for recovering debts and other payments due, including any possession proceedings
- In our legitimate interests for administering liability for Council Tax
- In our legitimate interests and those of the provider relating to arranging and paying for utilities and services
- In our legitimate interests for dealing with welfare benefits (including Universal Credit and housing benefit) where payable in respect of the rent
- In our legitimate interests in relation to tenancy termination including the return of any deposit
- In our legitimate interests for processing complaints
- For contractual performance or in our legitimate interests for dealing with health and disability issues relating to tenants/residents
- In our legitimate interests for obtaining and holding audio and cctv recordings
- To perform our legal obligations to provide information to public or local authorities who are legally entitled to require this information
- In your vital interests for contacting next of kin etc., in an emergency
- In our legitimate interests for the storage of emails, records of calls and other communications
- In accordance with our legal obligations if you exercise your rights under data protection law
- To perform our legal obligations for compliance with legal and regulatory requirements
- In our legitimate interests for the establishment and defence of legal rights
- In our legitimate interests for prevention, detection and investigation of crime and anti-social behaviour and the security of any website or other means of electronic communication

We will only use your personal data for the purposes for which we have collected it. If we need to process your personal data for a different purpose that is not compatible with the original purpose that we collected your personal data, we will let you know. We may process your personal

data for a different purpose and without your consent where it is necessary for us to comply with our legal obligations.

### **External Third Parties**

We may share this information with Service providers acting as processors based in the United Kingdom who provide IT and system administration services, anti-money laundering service providers, tenancy deposit administrators (such as the Tenancy Deposit Scheme) and services to enable us to perform our contract with you. Advertisers and advertising networks (including social media) that require the data to select and serve relevant adverts to you. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accountancy services. HMRC, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances

### **Other Third Parties**

Sometimes there may be third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

## **How we store your personal information**

Your information is securely stored.

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

The time period may vary depending on type of service or product you have requested from us. In certain circumstances we have a statutory obligation to keep your personal information for a set period of time, for example, financial information (normally 7 years) for financial auditing purposes. Information is always retained in line with its purpose of processing and only for as long as necessary usually, information is kept for 7 years after last contact with you. However, the retention period may be extended dependent upon any legal or contractual obligations Countrywide may be required to comply with, as well as any overriding business legitimate interests.

## **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at Select Property Management Limited, 120 High Street, Amblecote, DY8 4DA or email [enquiries@selectsalesandlettings.com](mailto:enquiries@selectsalesandlettings.com) if you wish to make a request.

Upon receipt of your request, we will carry out a review and a response, determining our decision will be provided to you within the recommended timescales.

## **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at Select Property Management Limited, 120 High Street, Amblecote, DY8 4DA or email [enquiries@selectsalesandlettings.com](mailto:enquiries@selectsalesandlettings.com)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>