

# Privacy Policy

## 1. Purpose of This Notice

This notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 1998 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

## 2. Definitions

**Data controller** – A controller determines the purposes and means of processing personal data.

**Data processor** – A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural, living person.

**Categories of data** – Personal data and special categories of personal data

**Personal data** – The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** – The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** – means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### **3. About Us**

S&S Property management (Yorkshire ) Ltd , is a letting & management business service . We are registered in England and Wales as a limited company number **05918117** and our registered office 83 Trinity Street, Huddersfield, HD1 4DN.

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed a Data Protection Officer. Our Data Protection Officer is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted at paragraph 12 (Contact Us), below.

### **4. How We May Collect Your Personal Data**

We obtain personal data about you to provide you with our services, for example, when:

- you request a proposal from us in respect of the services we provide.
- you engage us to provide our services and during the provision of those services; or
- you contact us by email, telephone, post, text messages or social media and other digital methods of communication.

## **5. The Kind of Information We Hold About You**

The information we hold about you may include the following:

- your personal details (such as your name and/or address).
- details of contact we have had with you in relation to the provision, or the proposed provision, of our services.
- details of any services you have received from us.
- our correspondence and communications with you.
- information about any complaints and enquiries you make to us.
- information from research, surveys, and marketing activities.
- Information we receive from other sources, such as publicly available information.
- Special category data relating to Health and lifestyle as appropriate to the contract we are fulfilling.

## **6. How We Use Personal Data We Hold About You**

We may process your personal data for purposes necessary for the performance of our contract with you and to comply with our legal obligations.

We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

### **Situations in which we will use your personal data**

We may use your personal data in order to:

- carry out our obligations arising from any agreements entered into between you and us (which will most usually be for the provision of our services).
- carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client.
- provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes.
- seek your thoughts and opinions on the services we provide; and
- notify you about any changes to our services.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

### **Data retention**

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

We reserve the right to retain data for longer where we believe it is in our legitimate interests to do so, such as to defend legal claims/complaints, or to be able to inform you about our future services. In any case, we shall not retain your personal data for

longer than is necessary, however given the open-ended nature of our commitment and relationship to you, we cannot provide an absolute timescale. In some cases, we are required to keep your data forever, to meet legal and regulatory obligations. In other cases, we can delete certain categories of data after a 7-year period.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services provided.
- any statutory or legal obligations.
- the purposes for which we originally collected the personal data.
- the lawful grounds on which we based our processing.
- the types of personal data we have collected.
- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

## **7. Change of purpose**

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

## **8. Data Sharing**

### **Why might you share my personal data with third parties?**

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

### **Which third-party service providers process my personal data?**

“Third parties” includes third-party service providers and other entities within our group. The following activities are carried out by third-party service providers: IT and cloud services, professional advisory services, administration services, marketing services and banking services.

Where third parties are involved in processing your data, we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will only act in accordance with our written instructions.

Where it is necessary for your personal data to be forwarded to a third party, we'll use appropriate security measures to protect your personal data in transit. We shall take care to ensure the information we send is either password protected or encrypted before it is sent, depending on the category and sensitivity of information involved.

To fulfil our obligations in respect of prevention of money laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

All our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

### **What about other third parties?**

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

## **9. Transferring Personal Data outside The European Economic Area (EEA)**

We will not transfer the personal data we collect about you outside of the EEA unless we are satisfied that they have the appropriate protocols and security measures in place to comply with the requirements of the General Data Protection Regulations.

## 10. Data Security

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so, and as soon as is reasonably practicable.

## 11. Rights of Access, Correction, Erasure, and Restriction

### Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

Your rights in connection with personal data

### Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- The right to withdraw your consent to the processing at any time, where consent was our lawful basis for processing the data.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our Data Protection Point of Contact, [shazhad@sandsproperties.co.uk](mailto:shazhad@sandsproperties.co.uk)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **12. Automated Decision Making**

Some of our policy providers, acting in the capacity of a Data Processor, will have an element of automated decision making and profiling in their actions, they will use algorithms to decide on matters such as risk-profiling.

If they are not satisfied with the application, then they may be unable to offer you a product or service. You will be notified about this decision when it is made known to Charterfields Certified Chartered Accountants.

## **13. Right to Withdraw Consent**



In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our Data Protection Point of Contact, [shazhad@sandsproperties.co.uk](mailto:shazhad@sandsproperties.co.uk)>

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

#### **14. Further Processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

#### **15. Changes to This Notice**

Any changes we may make to our privacy notice in the future will be updated on our website at [www.sandsproperties.co.uk](http://www.sandsproperties.co.uk).

Please check back frequently to see any updates or changes to our privacy policy.

This privacy notice was last updated on the 15/02/2021

#### **16. Contact Us**

If you have any questions regarding this notice or if you would like to speak to us about the way we process your personal data, please email our Data Protection Point of Contact, Shazhad Arshid on or telephone our Data Protection Point of Contact on 01484 539439 or 07905267039

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone - 01484539439

Email – [shazhad@sandsproperties.co.uk](mailto:shazhad@sandsproperties.co.uk).