

DATED

14th May

2022

PRIVACY NOTICE provided by Fifield Glyn Ltd

relating to

Its delivery of

Residential Property Management Services /

Residential Property Services



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 also 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 organisation's rights in relation to you/your organisation's 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

Fifield Glyn Limited collects, uses and is responsible for certain personal information that it holds about you/your organisation. When we do so we are regulated under the Data Protection Act 2018 which applies across 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 Fifield Glyn Limited.

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, freeholders, block directors, leaseholders, tenants and residents, we may collect the following personal information when you / your organisation or they provide it to us:

What type of information is collected from you?

We usually collect information that you willingly provide us, or which is included in your lease documentation.

The personal information we collect might include:

- Personal identification data (Name, surname, title, date of birth)
- Contact information data (Email, phone number, address, country)
- Financial and earnings data (Bank account and profits / remuneration data but not credit card

data)

- Medical details where that is relevant to a claim/case/matter
- Special Categories of personal data in rare circumstance only where relevant to our engagement and this will be kept securely away from other data
- Data required for Money Laundering Checks and other ID checks
- Personal data about other named parties to the lease or those you authorise to pay the rent as your alias (e.g. your spouse or business partners). You must have their authority to provide their personal data and share this Privacy Notice with them beforehand.

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, Accountants, 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 we 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 Bodies (RICS / ARMA), Out of Hours Providers, Approved Contractors, Building Caretaker/Staff 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 UK and 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 share personal information with law enforcement or other authorities if required by applicable law.

We will not share your/your organisation's 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 organisation's personal information.

10. TRANSFER OF YOUR INFORMATION OUT OF THE UK AND EEA

We may transfer your personal information to the following which are located outside the UK and European Economic Area (EEA).

Under Data Protection Law, international transfers of personal data may take place if the third country ensures an adequate level of protection, and both controller and processor, provide appropriate safeguards/transfer mechanisms, through means such as International Data Transfer Agreements (IDTA), Standard Contractual Clauses (SCC), or Binding Corporate Rules (BCR), where applicable. Furthermore, legislation provides for derogation clauses, allowing for the transfer to take place, even where neither an adequate level of protection, nor appropriate safeguard is in place.

Fifield Glyn Ltd may transfer the personal information collected about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Privacy Notice and in full compliance with all aspects of current UK Data Protection Laws and in accordance with the country-specific legislation applicable, or as otherwise disclosed to you at the time the data is collected (e.g. via a program specific privacy notice).

For example transfer of information to the United States of America in order to back up your data held in our property management system in recognised data centres

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 Data Protection Act 2018 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, contact:

Lead Supervisory Authority (UK):

Information Commissioner's Office
Wycliffe House,
Water Lane
Wilmslow,
Cheshire SK9 5AF
www.ico.org.uk

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

- email, call or write to us as follows_

Company.secretary@fifieldglyn.com

Phone: 01606 351351

Address:

Company Secretary

Fifield Glyn

No 1 Royal Mews

Gadbrook Park

Cheshire

CW9 7UD

- 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 you information safely and securely.

To enable us to do this. We have appropriate security measures in place to prevent your/your organisation's personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your/your organisation's personal information to those who have a genuine business need to know it. Those processing your/your organisation's 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. COMPLAINTS AND FEEDBACK

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

If we fall short of your expectations in processing your personal information or you wish to make a complaint regarding how we handle your personal data, or if you believe there has been a breach of your personal information, applicable privacy laws/principles, or have a concern about Fifield Glyn's privacy practices, would like to access and/or update your information or preferences you provided to us, please click email company.secretary@fifieldglyn.com

To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time.

If we cannot for lawful reasons complete your request we will explain this to you to the extent that we lawfully can.

Under Article 77 GDPR and Part 6 Chapter 6 Section 165 DPA 2018, you also have the right to lodge a complaint with the UK Supervisory Authority, if you feel we have, or are, processing your personal data in a way in which infringes the Regulation.

Lead Supervisory Authority (UK):

Information Commissioner's Office
Wycliffe House,
Water Lane
Wilmslow,
Cheshire SK9 5AF
www.ico.org.uk

Tel 0303 123 1113

14. CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice was published on 14th May 2022 and will be updated to reflect 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, braille etc then please contact us as stated above in Section 11.

