

Privacy Notice

Last Updated: March 2021

Castle Eden Property Management Ltd care about your data and is committed to ensuring that it stores, records and processes it effectively and in ways that comply with its obligations under the General Data Protection Regulations 2018 (GDPR).

1. Who we are

Castle Eden Property Management Ltd (the “data controller”) collects, uses and is responsible for certain personal information about you. When we do so, we are regulated under the General Data Protection Regulation and we are responsible as “data controller” for that personal information for the purposes of those laws.

In this Privacy Notice, references to “we” or “us” means Castle Eden Property Management Ltd.

2. Data protection 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 performing our contractual duties as managing agent, we may collect the following personal information when you provide it to us:

- Name
- Correspondence address
- Service address
- Telephone number
- Email address
- Bank details
- VAT number
- Date of birth
- Properties owned
- CCTV images (where installed)

The provision of personal data is required from you to enable us to perform our duties depending on your relationship with Castle Eden Property Management Ltd. We will inform you at the point of collecting information from you whether you are required to provide the information to us.

We may also obtain the personal information listed above from other sources, detailed as follows:

- management agreement;
- directly supplied via email/phone;
- online website form;
- lease or transfer documents;
- previous managing agents;
- AP01 form (for new company director appointments);
- letting agents;
- information supplied by solicitors;

- contractor review form; or
- share certificates;
- CCTV images - CCTV cameras on the estates where there is surveillance present.

5. Who we share your personal information with

To perform our contractual duties as managing agent, we may share the above categories of personal data with the following categories of recipients:

- Banks
- Companies House
- Contractors
- Debt recovery companies
- Emergency services upon request from the police
- External accountants
- Freeholders/landlords
- ICO for subject access requests and breaches
- Insurance providers
- Management Company Directors
- Managing Agents for management handovers
- Ombudsman
- Regulatory bodies for audit purposes
- Solicitors
- Technical and emergency support providers

Disclosure of recorded CCTV material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following;

- Security companies who have been appointed to provide surveillance and security services, in accordance with the purposes of the system;
- Prosecution agencies;
- People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquires);
- Freehold representative and Management Company Directors in accordance with the purposes of the system;
- Emergency services at the request of the police.

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

We will not share your personal information with any other third party.

6. Where your personal information may be held

Information may be held at our offices, third party agencies, service providers, representatives 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 policy.

7. How long your personal information will be kept

- We will hold personal information for the duration of management and up to 10 years from the end of management.
- Unless the CCTV tapes are required for evidential purposes or the investigation of crime or otherwise required by law, recorded images will be retained for no longer than 31 days as determined by the system's recording capability.

8. Reasons we can collect and use your personal information

We collect and use your personal data on the following lawful basis:

- Freeholder/landlord: Contractual basis to fulfil our management duties.
- Property owners (leaseholder and freeholder): Contractual basis to fulfil our management duties.
- Tenants and residents/occupants: Legitimate interest basis for corresponding with whilst in residence, to carry out management services and to contact in emergencies.
- Emergency contacts: Legitimate interest basis to contact in emergencies.
- Company secretaries (individuals)/: Legitimate interest basis for corresponding with regarding the sale of a property.
- Suppliers/Contractors (sole traders): Contractual basis to send works instructions, process invoices and make payments.
- CCTV: Legitimate interest basis for fulfilling security obligations.

9. Your rights

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, this includes rights to:

- Fair processing of information and transparency regarding 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.
- 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 affecting 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, search for the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation. If you would like to exercise any of those rights, please:

- Write to us at: Castle Eden Property Management Ltd, 32 Eden Street, Carlisle, CA3 9LR
- Let us have enough information to identify you, including your reference number, full name, address, email address and name of your estate.
- 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).
- Let us know the information to which your request relates, including any account or reference numbers if you have them.

10. Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, 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. How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>.

12. Changes to this Privacy Notice

This Privacy Notice was published on 24 May 2018. We may change this privacy notice from time to time and when we do so we will inform you.