

GH Property Management Services Limited are continually committed to ensuring that your privacy is protected.

This privacy notice explains who we are, what personal data / information we hold about you, how we collect it, store it, use it and how we may share information about you prior to / during our management of your block / development and after it ends. It also explains your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

We are required to notify you of this information under the General Data Protection Regulation.

Who are we?

GH Property Management cater for the management and maintenance of many different categories of properties, such as, purpose-built apartment blocks, converted houses and private housing developments. We use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'Controller' of that personal information for the purposes of those laws.

In this privacy notice, references to "we" or "us" means GH Property Management.

Our 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.

What personal information do we collect and use?

As Managing Agents we collect and hold on file the following personal information when you provide it to us:

- Name, title, email address, home / work / mobile telephone numbers, postal address

The provision of the personal data outlined above is required from you to enable us to perform our contract as managing agent appointed for and on behalf of the block / development where you own a property. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

We may collect / store other sensitive personal information when appropriate:

- Information regarding personal circumstances where it effects the management of the block / development
- Death / marriage certificates
- Vehicle details
- Bank details
- Religion / ethnic origin

At times we may also obtain personal information from other sources as follows:

- Directors / Other Leaseholders
- Insurance providers / Engineers / Contractors
- Debt collection company / Solicitors
- Authorities
- Other managing agents
- CCTV footage

How do we use your personal information?

Any data collected / stored at GH Property Management will be treated as strictly confidential.

We will typically collect and use this information for the following purposes:

- Ensure the smooth running of your block / development
- Maintain block records
- Inform you of relevant updates or services

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

We will never use your personal data for marketing purposes.

Who do we share your personal information with?

There may be times when we need to routinely share the following categories of personal data in order to enable us to perform our contract as managing agent.

This personal information may be shared with the following categories of recipients / they may have access to your personal data:

- Directors / Other Leaseholders / Freeholders
- Insurance providers / brokers
- Contractors
- Debt collectors
- Lawyers
- Accountants
- Software provider
- IT support provider
- New managing agents
- Regulatory body
- 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 and we do not currently transfer data outside of the EU.

Where is your information held?

Information is held at our offices.

We have strict security measures in place to seek to ensure that there is appropriate security for information we hold including those measures detailed in our GDPR data protection policy.

How do we keep your personal information secure?

We have appropriate security measures in place to prevent personal information from being accidentally lost or 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 promptly of a suspected data security breach where we are legally required to do so.

How long is your information stored?

We will keep your personal data for no longer than reasonably necessary in order to communicate and provide services related to you and your property.

We will continue to hold your personal data if you own / live in a property at a block / development managed by us. All personal data held on a data subject will be deleted 12 years after they cease to be a lessee / resident in that development or when we no longer manage a development unless you have unresolved legal claims / complaints then we will retain the information for longer.

What are the reasons we can collect your personal data?

We rely on 2 lawful bases for the collection of personal data:

- For the performance of a contract you have with our Client, namely the block / development where you own a property (i.e. a Lease).

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.

What are your rights?

Under the **General Data Protection Regulation**, you have several important rights free of charge.

In summary, those include rights to:

- Fair processing of information and transparency over how we use your personal information
- Request access to personal information held by us on you and to certain other supplementary information that this Privacy Notice is already designed to address
- Expect us to correct any mistakes in your information which we hold
- Request 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 that 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 your rights, including the circumstances in which they apply, see guidance provided by the UK Information Commissioner's Office (ICO) on individuals rights under the **General Data Protection Regulation**.

If you would like to exercise any of the above listed rights, please email, call or write to us using the contact details provided on page 1 of this document.

When contacting us to exercise these rights, please ensure you leave enough information to identify you, for example, your full name, address and property address and also let us know the information to which your request relates, including any account or

reference numbers, if relevant / if you have them. You may be required to provide us with proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill).

If any of your personal details change, please ensure that you let us know as soon as possible in writing. A member of staff will contact you to confirm when your personal records have been updated.

What should you do if you wish to complain?

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

The General Data Protection Regulation gives you right to lodge a complaint with a supervisory authority, particularly 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/> or by telephone on 0303 123 1113.

What will happen in the event that changes take place to this privacy notice?

This privacy notice was published in April 2018 and was last updated in September 2018.

We may change this privacy notice from time to time, and when we do we will inform you.

This privacy notice will always be available on our website.

How can you obtain further help / guidance?

If you would like a printed copy of this notice or for it to be provided in any other format, for example, audio, large print or braille, please contact us using the details on page 1 of this document.

Policy Document / Privacy Notice / V2.0 / 09/18

Author: