

# White & Co.

## Tenant's Privacy and Data Protection Policy



PY.003  
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White & Co. recognises the importance of the personal information you have trusted to us. We are committed to protecting and respecting your privacy.

This Privacy and Data Protection Policy explains how, when and why we collect your personal information. It sets down the situations where we may disclose your information to others and how we keep it secure.

### 1. Our Privacy and Data Protection policy

- We only collect personal information about you where it is completely necessary.
- We ensure we only collect the information we need.
- We retain your data for as long as necessary and not longer
- We will not send you marketing material or sell your personal information to third parties. There may be circumstances where we are required to share your information with third parties; these are detailed below.
- We will protect your data with an appropriate combination of technical and organisational measures.
- You have rights to access and correct your information.

### 2. Why we collect Personal Information

We require your personal information to properly manage and administer your tenancy and the building you occupy. We process this information for two reasons:

#### Performance of a contract.

The information allows us to undertake and perform our obligations and duties to you in accordance with the terms of the contract between you and your landlord, as set down in your tenancy agreement or lease. It enables us to supply you with the services and information which you have requested and to notify you of any changes to our supplies.

#### Legitimate interest

Your personal information enables us to properly carry out our business as property manager by allowing us to control risk, detect fraud and improve our operations.

We will process personal information during due diligence checks on any prospective tenant, including whether there are any money judgements against them or any history of bankruptcy or insolvency. We will also analyse the information we collect so that we can administer, support and improve our business and the services we offer.

### 3. How we collect personal information

The personal information we hold was collected through the New Tenancy Application Forms you completed when you applied for a tenancy.

From time to time, we may ask you to update this information or provide us with missing information.

We do not collect information through our website.

### 4. What information we collect

We collect and process the following information about you:

#### Applicant Information

Applicant name, e-mail address, telephone number, date of birth, current and previous addresses, marital status, National Insurance Number, nationality, next of kin.

#### Tenancy Information

Property address; term, rent, deposit, utility and service responsibilities.

#### Credit Review Information

The employment status of tenants and guarantors, address; the contact details including email and phone of the employer or accountant, length of employment, salary information (including any regular overtime or commission), and any other income received; bank account details of the tenant including account number and sort code and any hire purchase or loan agreements/credit cards or store cards that you have; and

Depending on the circumstances of your application, we may also collect

#### Applicant Further Information

Name of university or college where you are studying; any welfare benefits that you may be eligible for or are receiving; the name of friends that you are staying with

#### Guarantor Information

Guarantor name, e-mail address, telephone number, date of birth, address including any previous addresses, marital status, National Insurance Number, nationality.

### 5. Sharing your Personal Information

We will not share, sell or distribute your personal information without your consent unless the law and our policies allow us to do so.

We will not share your information for marketing purposes with any other company outside our business.

We may disclose your information to other third parties who act for us. We will only do this for the following reasons:

- If we enter into a joint venture with or merged with a business entity, your information may be disclosed

to our new business partners or owners;

- In carrying out due diligence on you as a prospective tenant or guarantor, including but not limited to the carrying out of affordability checks and obtaining references from relevant parties whose data you have provided;
- In the event that you fail to make payments under your tenancy we may disclose your information to any relevant party assisting in the recovery of this debt or the tracing of you as a tenant;
- In the creation, renewal or termination of the tenancy, your information will be disclosed to the relevant local authority, tenancy deposit scheme administrator, service or utility provider, freeholder, factor, facilities manager or any other relevant person or organisation in connection with the proper management of the tenancy and building.

## 6. How we keep your Personal Information secure

We work hard to keep your data safe. We use a combination of technical and organisational measures to ensure, as far as reasonably possible, the confidentiality, integrity and availability of your information at all times.

The information you provide to us will be treated as confidential and will be processed only by third parties acting on our behalf within the UK and European Economic Area

### Transfer of data outside the UK and the EEA

Your information may be stored on servers located outside the UK and European Economic Area. In all cases we will require third-party providers to comply with General Data Protection Regulation (EU) 2016/679 ("GDPR").

## 7. How long we retain your Personal Information secure

We will avoid keeping your personal information for longer than we need to fulfil our obligations to you and to comply with the applicable legislation and regulations.

Where it is not possible for us to delete your data we will ensure the appropriate security is used to protect it.

Our full records retention policy and schedule is available from our Business Manager ([businessadmin@white-co.co.uk](mailto:businessadmin@white-co.co.uk)).

## 8. Your right to access your Personal Information

You have the right to:

- Request us to provide a copy of the information we hold about you. We will provide this information within one month of receiving your request and verifying your identity.
- Request us to correct any inaccuracies in your information;

- Request us to delete any personal information you believe we are not entitled to retain
- Object to receiving any marketing communications from us.

If you would like to exercise any of your rights please contact our Business Manager at [businessadmin@white-co.co.uk](mailto:businessadmin@white-co.co.uk).

## 9. White & Co. as a Registered Data Controller

White & Co. is registered as a Data Controller with the Office of the Information Commissioner under registration number Z3415761.

We are not required under the Data Protection legislation to appoint a Data Protection Officer.

## 10. How to complain about privacy and data protection matters

If you have a complaint or query regarding our use of your personal information, please contact our Business Manager on 01234 713 252 or write to us at [businessadmin@white-co.co.uk](mailto:businessadmin@white-co.co.uk) or 25 Market Place, Olney, Bucks, MK46 4BA.

### Referral to the Information Commissioner's Office

You also have the right to complain to the Information Commissioner's Office about our use of your information.

The Information Commissioner's contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone: 0303 123 1113, email: [casework@ico.org.uk](mailto:casework@ico.org.uk)