

## Belvoir Rugby Tenant Privacy Policy

**OWNER:** Rosie Callaway

17.09.21

**STATUS:** **LIVE**

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### VERSION CONTROL

DATE	VERSION	Description of Change	Change Author
25.4.18	1.0	Updated to comply with GDPR	Paul Callaway
<b>17.9.21</b>	<b>1.1</b>	<b>Updated to reflect additional data controller, COVID, and alignment to DPR</b>	<b>Paul Callaway</b>

## 1. Tenant Privacy Policy

Bacall Limited trading as Belvoir Rugby is committed to protecting and processing your personal data in accordance with the Data Protection Act 2018 (the legislation). For the purpose of the legislation and your personal data, Belvoir Rugby is the Data Controller, Rosie Callaway is the person responsible for data protection and can be contacted at 41 Newbold Road, Rugby, CV21 2ND.

Bacall LTD is a company registered in England – company number 04463067. We are a franchisee of the Belvoir Property Management UK LTD, the ultimate parent company is Belvoir Group PLC.

Data Protection Regulations are to safeguard your personally identifiable information or personal data. This 'plain English' Privacy Policy will be regularly reviewed and updated as part of our ongoing program of improvement and protection.

This privacy policy applies to information you provide to us. The franchisor is also a data controller for some of our data, you can find their privacy policy at [/www.belvoir.co.uk/privacy-policy/](http://www.belvoir.co.uk/privacy-policy/)

### Information held

The personal data we collect and process may include your:

- name, address, email addresses and telephone numbers
- previous address history and contact information
- employment record, salary and/or pension income details
- date of birth, gender, marital status...

...and sometimes other sensitive data, which may include your:

- banking details, credit history
- your National Insurance number
- previous names you've been known by
- (proof of) nationality
- proof of your right to remain, work or reside in the UK
- the names of your children
- your previous landlord's contact information
- data to prove where you live
- identification data (for example your passport or driving license information)

...if relevant to your application. Where the provision of data is a statutory requirement, a contractual requirement or a requirement necessary to enter into a contract, your refusal to provide the data may mean that we are unable to provide you with our service.

To ensure that we provide you with the best service possible we will need to collect and retain certain personal data. The data may be collected and processed by any Belvoir Rugby staff member. We collect the information in person, over the telephone or in written form. We may collect or confirm data from 3<sup>rd</sup> parties or via third parties e.g. Credit referencing agencies, referees, local authorities.

## Lawful basis of processing

Belvoir Rugby's lawful basis is predominantly 'Contract' – i.e. that the processing is necessary for a contract or tenancy agreement you have with us, or because you have asked us to undertake specific steps before entering into a contract or tenancy with us. Your personal data will be processed during and after your tenancy and any subsequent tenancy arranged through us.

## Online identifiers, IP addresses and cookie identifiers

Where you visit our website we may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns.

We may obtain information by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site. You can find more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org)

This policy only applies to our site. If you leave our site via a link or otherwise, you will be subject to the privacy policy of that website provider. We have no control over that privacy policy or the terms of the website and you should check their privacy policy before continuing to access the site.

Some of your "non-sensitive" details (such as your email address) may be transmitted over the internet and this can never be guaranteed to be 100% secure.

## Recipients of personal data

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations in order to fulfil our service with you. These may include:

- Your previous Landlord(s) or Lettings Agencies
- Your current and previous employers, or accountants
- Service Contractors (such as plumbers, glaziers, electricians, gardeners etc.)
- Your new Landlord, and/or any of the Landlord's professional representatives including but not limited to surveyors, estate agents
- Utility service management/comparison companies, utility providers, local Councils, online performance management agencies like Reputation.com and Trustist

We will not sell or provide your information to third parties other than to information processors with whom we have entered into contracts which require the information processors to comply in all

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respects with the requirements of this Privacy Policy and all legal requirements relating to information privacy.

## **Where is the data stored?**

Your personal data is stored...

- Electronically; within our policy controlled and password protected communication and customer management systems...
- ...physically (hard copy); within our policy controlled and physically secure office...

...and the data is stored within, or outside of, the European Union but with an organisation operating under the General Data Protection Regulations.

## **Transferring your information outside of the UK**

The information which you provide to us may have to be transferred to countries outside the United Kingdom ("UK") if any of our servers or our processors' servers are located outside the UK. Countries outside the UK and countries within the European Free Trade Area (EFTA") may not have equivalent information protection laws to those within the UK. By submitting your personal information, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the UK or EFTA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

## **Retention period and criteria used to determine the retention period**

We will retain some elements of your personal data for up to 7 years after your tenancy to comply with accounting legislation. What information can be anonymized will be, when no longer required for either contractual fulfilment or a legitimate interest. If the lawful basis for processing your data was deemed to be consent then you may withdraw consent at any time.

## **Your rights**

You have a 'right of access' to check your personal data, to verify the lawful basis of processing. We are obliged to respond to a written access request within 30 days and may not charge a fee unless the request is unfounded, excessive or repetitive. If a fee *is* charged it will be a reasonable fee based upon the administrative cost of providing the information.

You have a right to rectification if the data we hold is either inaccurate or incomplete. If your data has been disclosed to third parties then we must inform them of the rectification, where possible.

You have a right to erasure of your data when consent is our basis of processing (the right to be forgotten). You may request that your personal data be erased, for example, where there is no compelling reason for its continued processing or where you withdraw consent. We will comply with your request unless we have another basis of processing justifying our retaining the data (for example a legal requirement or the defence of a legal claim).

You have some rights to ask us to restrict processing i.e. to block or suppress processing where, for example, the data may be incorrect and whilst the accuracy is verified. We are permitted to store the data.

## **Your right to object**

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You do have a right to object to further processing of your personal data. We may be required to stop processing unless there is some other legitimate basis of processing such as a legitimate interest or a requirement for the exercise or defence of a legal claim.

## **Withdrawal of consent**

Where the lawful basis for processing is your consent, you may withdraw consent at any time by writing to, *Rosie Callaway, Bacall LTD, at 41 Newbold Road, Rugby, CV21 2ND.*

## **Covid - 19 temporary measures**

During the Covid-19 crisis we may be collecting increased data at an earlier point to reduce the amount of physical viewings and/or valuations. This data is being kept securely in line with this policy and will only be held for as long as it is required for the purpose intended. We may temporarily be holding health details which you have informed us of and we confirm that these are held securely and only shared with those employees, contractors or connected third parties as necessary for the required purpose. These are destroyed in line with this policy as soon as their required purpose ends.

We confirm that employees working from home during this crisis have been trained in following the procedures outlined in this policy to protect your personal data.

## **Further Information**

You can read more about the Data Protection at [ico.org.uk](http://ico.org.uk).

Any questions regarding this Policy and our privacy practices should be sent by email to [rugby@belvoirlettings.com](mailto:rugby@belvoirlettings.com), or in writing to Belvoir, 41 Newbold Road, Rugby, CV21 2ND.

## **2. Complaints procedure**

Our complaints procedure covers suspected Data Protection breaches and can be provided to you upon request. It contains information on how to make a complaint and how you can expect us to investigate it.

The supervisory authority responsible for data protection is the Information Commissioners Office (ICO) to whom concerns may be reported by phone on **0303 123 1113** or +44 1625 545 745 if calling from outside the UK, by email using the form on the website [ico.org.uk](http://ico.org.uk) or the livechat function.

**POLICY ENDS**