

## **Leaseholders Privacy Notice**

Haylock Investment & Management Services is committed to protecting and processing your personal data in accordance with the General Data Protection Regulations and the Data Protection Act 2018 (the legislation). For the purpose of the legislation and your personal data, HIMS, is the Data Controller, James Haylock is the person responsible for data protection and can be contacted at 7 Bridge Street, Halstead, Essex, CO9 1HU; rent@hims.uk.com; 01787 474123 The General Data Protection Regulations are to safeguard your personally identifiable information or personal data. This privacy notice will be regularly reviewed and updated.

### **Information held**

The personal data we process may include the information in column A of the attached appendix and may also include other sensitive data concerning health, if relevant to your registration. Where the provision of data is a statutory, a contractual requirement or a requirement necessary to enter into a contract, a 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 those listed in columns B and F. How we source the data is identified in column C. We may source data from 3rd parties or via third parties e.g. Credit referencing company. Lawful basis of processing your personal data will be used for the activities in column D. There are 6 lawful basis of processing your data including consent, a legitimate interest, contract fulfilment, a legal obligation and a vital interest. For each usage of the date the lawful basis of the processing of your data will be identified in column E. A legitimate interest is when we have a business or commercial reason to process your personal data which needs to be balanced with your interests i.e. what is right and best for you. Where we state that we have a legitimate interest, the fact that we have a legitimate interest and what that legitimate interest is, will be stated in column E.

### **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 and these may include those listed in column F. Where is the data stored? Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations. Retention period and criteria used to determine the retention period. We will retain some elements of your personal data for up to the time defined in column H after your enquiry. 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 consent then you may withdraw consent at any time. Where we have met you face to face, or transacted with you in some other way, we will hold your data for a longer period of time compared to if you have only enquired of our service and we have been unable to help you.

## **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 an 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 is to 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**

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, James Haylock, HIMS at 7 Bridge Street, Halstead, Essex or emailing [rent@hims.uk.com](mailto:rent@hims.uk.com).  
How to lodge a complaint with the supervisory authority 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 live chat function.

Data controller	A	B	C	D	E	F	G	H
Information held	Who is collecting it	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How stored	When will it be deleted	
Tenant name	Staff	In office, over the phone, email, self-registration, tenant application form	To use on contract	Contract fulfillment	Landlord, staff, local authority & utilities, contractors,	Paper / electronic	6 years after tenant leaves	
			Add to property management software	Contract fulfillment	Staff, Contractors, Property Management & Accounts Software provider	Software	During tenancy & 6 years beyond	
			Referencing	Contract fulfillment	Employer, current landlord, referencing co.	paper / electronic	During tenancy & 6 years beyond	
			To be able to contact tenant e.g. property management	Contract fulfillment	Contractors, staff,	Software system	6 years after tenant leaves	
			To use on prescribed information	Legal obligation	Staff, Deposit scheme, relevant person	Paper / electronic	6 Years after tenant leaves	
			If legal action is needed	Legal work	Solicitor, Court Services	Paper / electronic	6 years after tenant leaves	
			Services	Contract fulfillment	Council Tax & utility providers	Paper / electronic	6 years after tenant leaves	
			In office, over the phone, email, self-registration, tenant application form	Contract fulfillment	Landlord, staff, local authority & utilities, contractors,	Paper / electronic	6 years after tenant leaves	
Tenant contact details	Staff		To use on contract	Contract fulfillment	Staff, Contractors, Property Management & Accounts Software provider	Software	6 years after tenant leaves	
			Add to management software	Contract fulfillment	Employer, current landlord, referencing co.	paper / electronic	During tenancy & 6 years beyond	
			Referencing	Contract fulfillment	Contractors, staff,	Software system	6 years after tenant leaves	
			To be able to contact tenant e.g. property management	Contract fulfillment	Staff, Deposit scheme, relevant person	Paper / electronic	6 years after tenant leaves	
			To use in prescribed information	Legal obligation	Contractors, Court Services	Paper / electronic	6 years after tenant leaves	
			If legal action is needed, for example possession claim	Legal Work	Council Tax & utility providers, landlord	Paper / electronic	6 years after tenant leaves	
			Notify utilities & council tax	Contract fulfillment		Paper / electronic	6 years after tenant leaves	

Tenant Employer information	Staff	Tenant application form	Referencing & assessment	Contract fulfillment	Employer referencing co.	Paper / electronic	6 years after tenant leaves
Tenant's current landlord information	Staff	Tenant application form	Referencing & assessment	Contract fulfillment	Landlord, referencing co.	Paper / electronic	6 years after tenant leaves
Tenant Next of Kin details	Staff	Tenant application form	Contact in case of emergency alternative correspondence address	Legitimate interest	Staff, Public bodies, Deposit Scheme	Paper / electronic	6 years after tenant leaves
Tenant bank details	Staff	Tenant application form	Referencing & assessment	Contract fulfillment	Bank Statement referencing co.	Paper / electronic	6 years after tenant leaves
Tenant's Children details	Staff	Tenant application form	To identify permitted occupiers to include on tenancy agreement	Contract fulfillment	Staff, landlord	Paper / electronic	6 years after tenant leaves
Tenant passport or ID documents	Staff	Photocopy of original, face to face	To comply with right to rent checks	Legal obligation, contract fulfillment	Staff, landlord, Home Office	Paper / electronic	6 years after tenant leaves
Landlord name	Staff	In office, over the phone or by email	To use on contract	Contract fulfillment	Staff, Tenant	Paper / electronic	6 years after Landlord's contract ends
			To be able to contact landlord	Contract fulfillment	Staff	Paper / electronic	6 years after Landlord's contract ends
			To use on deposit prescribed information	Legal obligation	Staff, Tenant	Paper / electronic	6 years after Landlord's contract ends
			To offer extra services	Consent	Staff	Paper / electronic	6 years after Landlord's contract ends
			If legal action is needed	Legal work	Staff, Tenant, Solicitor, Court Services	Paper / electronic	6 years after Landlord's contract ends
Landlord contact details	Staff	In office, over the phone or by email	To use on contract	Contract fulfillment	Staff	Paper / electronic	6 years after Landlord's contract ends
			To be able to contact landlord	Contract fulfillment	Staff	Paper / electronic	6 years after Landlord's contract ends
			To use in prescribed information	Legal obligation	Staff	Paper / electronic	6 years after Landlord's contract ends
			To offer extra services	Consent	Staff	Paper / electronic	6 years after Landlord's contract ends
			To provide details to contractor	Contract fulfillment	Staff	Paper / electronic	6 years after Landlord's contract ends

			To chase rent arrears If legal action is needed, for example possession claim	Contract fulfillment	Staff	Paper / electronic	6 years after Landlord's contract ends
				Legal Work	Staff	Paper / electronic	6 years after Landlord's contract ends
<b>Applicant Name</b>	Staff	Face to face, email, tel	To add to database	Consent	Staff, landlords,	Paper / electronic	3 months unless applicant becomes a Tenant
			To be able to contact app.	Consent	Staff, landlords	Paper / electronic	3 months unless applicant becomes a Tenant
			To give to landlord	Consent	Landlord	Paper / electronic	3 months unless applicant becomes a Tenant
			To create a tenant record	Consent	Staff, Property Management & Accounts Software provider	Paper / electronic	3 months unless applicant becomes a Tenant
			To create application process	Consent	Staff,	Paper / electronic	3 months unless applicant becomes a Tenant
			To create Tenancy Agreement	Consent	Staff,	Paper / electronic	3 months unless applicant becomes a Tenant
			To carry out Right to Rent checks	Legal obligation	Staff / landlord	Paper / electronic	3 months unless applicant becomes a Tenant
<b>Applicant contact details</b>	Staff	Face to face, email, tel	To add to database	Consent	Staff, landlords,	Paper / electronic	3 months unless applicant becomes a Tenant
			To be able to contact app.	Consent	Staff, landlords	Paper / electronic	3 months unless applicant becomes a Tenant
			To give to or discuss with landlord	Consent	Landlord	Paper / electronic	3 months unless applicant becomes a Tenant
			To send marketing details to	Consent	Staff, 3rd party	Paper / electronic	3 months unless applicant becomes a Tenant
			To create a tenant record	Consent	staff, back up / cloud provider	Paper / electronic	3 months unless applicant becomes a Tenant
			To create application process	Consent	Staff,	Paper / electronic	3 months unless applicant becomes a Tenant



			To create Tenancy Agreement	Consent	Staff & landlord	Paper / electronic	3 months unless applicant becomes a Tenant
			To carry out Right to Rent checks	Legal obligation	Staff & landlord	Paper / electronic	3 months unless applicant becomes a Tenant
			Referencing	Consent	Staff, Landlord	Paper / electronic	3 months unless applicant becomes a Tenant
			Referees privacy	Consent	Staff, Landlord	Paper / electronic	3 months unless applicant becomes a Tenant
		In office, over the phone or by email					
<b>Contractor Name</b>	<b>Staff</b>	In office, over the phone or by email	To add to database	Consent	Staff	Paper / electronic	When a Contractor is no longer used.
			To be able to contact contractor	Consent	Staff	Paper / electronic	When a Contractor is no longer used.
			To give details to tenant	Consent	Staff, Tenant, Landlord	Paper / electronic	When a Contractor is no longer used.
<b>Contractor contact details</b>	<b>Staff</b>	In office, over the phone or by email	To add to database	Consent	Staff	Paper / electronic	When a Contractor is no longer used.
			To contact contractor	Consent	Staff, Tenant, Landlord	Paper / electronic	When a Contractor is no longer used.
			To send worksheets	Consent	Staff	Paper / electronic	When a Contractor is no longer used.
			To process payments	Consent	Staff, Landlord	Paper / electronic	When a Contractor is no longer used.
			To create contract	Consent	Staff, Landlord	Paper / electronic	When a Contractor is no longer used.
			To give details to tenant	Consent	Staff, Tenant, Landlord	Paper / electronic	When a Contractor is no longer used.
			Referencing	Consent	Staff	Paper / electronic	When a Contractor is no longer used.
			Referees privacy	Consent	Staff	Paper / electronic	When a Contractor is no longer used.
		In office, over the phone or by email					
<b>Staffing</b>	<b>Staff</b>	In office, over the phone or by email	CV Retention	Contractual	Staff	Paper, Electronic	A period after employment ends
		In office, over the phone or by email	Contact information	Contractual	Staff	Paper / electronic	A period after employment ends
<b>Staff</b>	<b>Staff</b>	In office, over the phone or by email	Bank details	Contractual	Staff	Paper / electronic	A period after employment ends
			Performance records	Contractual	Staff	Paper / electronic	A period after employment ends