

# PRIVACY NOTICE

## IMPORTANT CHANGES TO DATA PROTECTION

*The General Data Protection Regulation (GDPR) comes into force on 25 May 2018 and will replace the current Data Protection Act governing how PRIMO processes your personal information.*

*The GDPR has been developed to create a more up to date law for data protection reflecting the changes in the digital age and strengthening the rights of individuals and how their personal data is processed and protected. Many of the GDPRs main concepts and principles are much the same as those in the Data Protection Act but with new elements and enhancements and a greater emphasis on accountability and how organisations demonstrate their compliance with the Regulation.*

The privacy and security of your personal information is extremely important to us. This **PRIVACY NOTICE** explains how and why we collect your personal information and how we use it, to make sure you stay informed, and can be confident about giving us your information. It also explains how we store your information and your rights regarding the information we hold about you.

**We'll keep this document updated to show you all the things we do with your personal information.** This policy applies if you're a TENANT, PROSPECTIVE TENANT, GUARANTOR OR LANDLORD, EMPLOYEE, PROSPECTIVE EMPLOYEE, or use any of our services, visit our website, email, call or write to us.

We'll never sell your personal information, or share it with third parties (other than those parties/and in the circumstances detailed later in this document).

## Who 'we' are

In this policy, whenever you see the words 'we', 'us', 'our', 'Primo', it refers to Primo Property Management (NW) Limited, a national provider of student and residential tenancies. Our company number is 07934274 and our registered address is 14 Wood Street, Bolton. BL1 1DY

PRIMO is a 'data controller'. This means that we are responsible for deciding how we hold and use personal information. We are required under data protection laws to notify you of the information contained in this PRIVACY NOTICE.

## Data Protection Contact

We have appointed a Compliance Officer for Data Protection (CODP) to oversee compliance with GDPR. If you have any questions about this PRIVACY NOTICE or how we handle personal information, please contact the CODP in writing using the details below:

Email address: [enquiries@primopropertymanagement.co.uk](mailto:enquiries@primopropertymanagement.co.uk) email heading **FAO CODP / PRIVACY 'QUERY'**

Postal address: **FAO COPD PRIVACY 'QUERY'**, Primo Property Management (NW) Limited 14 Wood Street, Bolton BL1 1DY

## **Registrations:**

Our registered company number is: 07934274

Our ICO registration number is: Z3552157

## **What we mean by personal information**

When we refer to personal information in this Privacy Policy, we mean information that can identify you as an individual or is capable of doing so, we don't mean general, statistical, aggregated or anonymous information. The personal information you give us may include, but is not limited to, the following: name, title, address, date of birth, age, gender, employment status, demographic information, email address, telephone numbers, photographs.

## **Why we collect your personal information**

We collect your personal information relating to providing you with a tenancy in one of our managed properties, or during recruitment, as part of the application process, when you apply for employment with us. We may also collect this information as directed by the law (for example, the Right to Rent legislation).

## **How we collect your personal information**

We collect personal information when you communicate with us in relation to the above (for example, when you submit an enquiry via our website, or call our office to enquire about room availability, or submit information via a third-party platform (including Accommodation for Students (AfS), RightMove, etc). Additionally, we collect personal information when you fill out your application form to become a tenant, or if you contact us with a query or complaint. If you are a Guarantor, your personal information may have been provided to us by the tenant (with your consent).

You may also call our head office to make a payment (a deposit, holding deposit, or rent payment) providing us with your credit or debit card number and expiry date (or relevant bank account details). Please be assured that any such information ("confidential financial information") will be used only for the specific purpose for which it is provided.

As a prospective employee, Primo also collects personal information during the recruitment process, when you choose to submit your CV.

## **Linking to other Websites**

Our website/moodle edYOUcate, may include links to other third-party websites which are not within our control. Once you have left our website, we cannot be held responsible for the content of these third-party websites or the protection and privacy of any information which you provide to those websites. You should exercise caution and look at the privacy policy applicable to the website in question.

## **The use of Cookies on our Website**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web

page to be stored until it is needed for use on another, allowing a website to provide you with personalised experience and the website owner with statistics and how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It should also allow you to prevent or limit their use. Our website uses the following cookies:

<b>http://primopropertymanagement.co.uk/</b>
▶ .primopropertymanagement.co.uk   <b>_ga</b>
▶ .primopropertymanagement.co.uk   <b>_gat</b>
▶ .primopropertymanagement.co.uk   <b>_gid</b>

## **Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

## **How we use your personal information**

We'll only use your personal information on relevant lawful grounds as permitted by the EU General Data Protection Regulation (from 25 May 2018)/UK Data Protection Act and Privacy of Electronic Communication Regulation. For clarity, your personal information (tenant/guarantor) will be used to grant a tenancy in one of our accommodations and in the activity of recruitment, for the purpose of offering you (the job applicant) employment with PRIMO.

Personal information provided to us will be used for the purpose or purposes outlined above.

## **Your personal information - security**

We have put in place appropriate measures to protect your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those people who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put procedures in place to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **Your personal information - retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal accounting, or reporting requirements.

## **Sharing your personal information with third parties**

We do not disclose your personal information with anyone outside PRIMO except:

- Where we have a legal or regulatory obligation to do so – this will include sharing your personal information with local councils for the provision of electoral roll services/Council Tax/the Police if they request it
- Where we use third party suppliers to provide services to us (e.g. our IT providers) and they need access to your personal information to deliver that service (set you up with a password and so forth)
- Where it is necessary to do so to protect or defend our legal rights or the legal rights of others
- If you are a tenant and you fail to pay your rent we may contact the Guarantor/Guarantor Service and inform them of this failure when exercising our rights under the Guarantee
- We share your information and the Guarantor's information with the owner of the property (the landlord), and any successor
- With your permission, we will provide your contact details with our third-party suppliers in the interests of providing you with a quick and responsive service to any issues you may have (in relation to maintenance repairs)

We will not, under any circumstances, sell your personal information to third parties.

## **Changes to your personal information/updating your personal information**

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed of your personal information changes during the length of your tenancy with us. If your personal information changes, please let us know by emailing [enquiries@primopropertymanagement.co.uk](mailto:enquiries@primopropertymanagement.co.uk) **FAO CODP PRIVACY 'PERSONAL INFORMATION UPDATE'** Thank you.

## **Your rights**

Under certain circumstances, by law you have the right to:

**Request access** to your personal information. This is commonly known as a subject access request. This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.

**Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

**Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

**Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

**Request the transfer** of your personal information to another party.

**Request the reconsideration** of an automated decision. This enables you to ask us to reconsider a decision that was made solely by automated means or to ask for human intervention.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, request that we transfer a copy of your personal information to another party or request the reconsideration of an automated decision, please contact us by emailing [enquiries@primopropertymanagement.co.uk](mailto:enquiries@primopropertymanagement.co.uk)  
**FAO CODP PRIVACY 'RIGHTS'**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please or email [enquiries@primopropertymanagement.co.uk](mailto:enquiries@primopropertymanagement.co.uk) **FAO CODP PRIVACY**

**'WITHDRAW CONSENT'** Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to.

## **COMPLAINTS**

If you have any concerns over how we use your data, please email [enquiries@primopropertymanagement.co.uk](mailto:enquiries@primopropertymanagement.co.uk) **FAO CODP PRIVACY 'COMPLAINT'**

If you are not satisfied that we have addressed your concerns adequately, you have the right to lodge a complaint with the ICO. Their contact details are below:

### **Information Commissioner's Office**

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel: 0303 123 1113

Web: [www.ico.org.uk](http://www.ico.org.uk)

