

Privacy Notice

This privacy notice explains how The Home Management Company uses the personal information we collect from you, either through using our website, or in any other way, electronically, verbally or in writing.

Data controller

The Home Management Company is the data controller, this is because we make decisions about what data we collect and how it is used and with whom it is shared with. We can be contacted at info@homemanco.co.uk or telephone number 020 8950 7497

On what basis do we collect and process your data?

Data Protection law defines the basis by which we can lawfully collect and process personal data.

Consent

We will collect and process your personal data on the basis of your freely given and informed consent where we have concluded that this is the most appropriate basis for the processing. You are free to withdraw your consent at any time and can do so by contacting us on the numbers above or using the email address.

To enter into or in pursuance of a contract:

We will collect personal data when engaging with individuals to enter into a contract, commercial agreement to supply services or goods. We will continue to process that data for the duration and often subsequently after the contract expires or is terminated.

Where we have a legal obligation:

We will collect personal data when we are required to through a legal obligation, such as requirements from public authorities in relation to health and safety, welfare and safeguarding.

In our legitimate interest:

We will collect and process personal data where it is in the legitimate interest of The Home Management Company to do so. Specifically, we use legitimate interest in relation to processing the personal data of third party emergency contacts.

For the data we act as data controller for, we have determined the following basis:

Landlords

Entering into Contract	Identity Details	Full Name	Contract
Legal Obligation	Legal Requirement	UK Residential Status for Tax	Legal Obligation
Entering into Contract	Contact Details	Address	Contract
Entering into Contract	Contact Details	Phone numbers	Contract
Entering into Contract	Contact Details	Email address	Legitimate Interest
Entering into Contract	Financial Details	Bank Account number	Legitimate Interest
Legal Obligation	Legal Requirement	Mortgage Consent (Right to let)	Legal Obligation
Entering into Contract	Operational data	Building Insurance	Legitimate Interest
Entering into Contract	Operational data	Signature	Contract
Entering into Contract	Operational data	Rent Guarantee Insurance	Legitimate Interest
Entering into Contract	Verification	IP Address	Legitimate Interest
Entering into Contract	Verification	Geo Location	Legitimate Interest

Legal Obligation	Legal Requirement	Overseas Landlord Approval Number	Legal Obligation
Legal Obligation	Legal Requirement	Proof of Identification	Legal Obligation
Entering into Contract	Operational data	Premises address	Legitimate Interest
Legal Obligation	Legal Requirement	Proof of Ownership	Legal Obligation
Marketing	Identity Details	Name	Consent of the Data Subject
Marketing	Contact Details	Email address	Consent of the Data Subject

Tenants

Determining Suitability to Lease	Identity Details	Full Name	Contract
Determining Suitability to Lease	Identity Details	Previous Name	Legitimate Interest
Determining Suitability to Lease	Identity Details	Date of Birth	Contract
Determining Suitability to Lease	Contact Details	Current Address	Contract
Determining Suitability to Lease	Contact Details	Phone number	Legitimate Interest
Determining Suitability to Lease	Contact Details	Phone Number (Work)	Legitimate Interest
Determining Suitability to Lease	Contact Details	Mobile number	Legitimate Interest
Determining Suitability to Lease	Contact Details	Email address	Legitimate Interest
Determining Suitability to Lease	Operational data	Smoker or Non Smoker	Legitimate Interest
Determining Suitability to Lease	Operational data	Pet Owner?	Legitimate Interest
Determining Suitability to Lease	Operational data	Current Employment Status	Legitimate Interest
Determining Suitability to Lease	Operational data	Full Name of Employer	Legitimate Interest
Determining Suitability to Lease	Operational data	Address of Place of Work	Legitimate Interest
Determining Suitability to Lease	Operational data	Telephone Number of Place of Work	Legitimate Interest
Determining Suitability to Lease	Operational data	Employer email address	Legitimate Interest
Determining Suitability to Lease	Operational data	Date Started	Legitimate Interest
Determining Suitability to Lease	Operational data	Position Held	Legitimate Interest
Determining Suitability to Lease	Financial Details	Salary Details	Legitimate Interest
Determining Suitability to Lease	Financial Details	Other Income such As Benefits	Legitimate Interest
Determining Suitability to Lease	Financial Details	Accountant Details if Applicable	Legitimate Interest
Determining Suitability to Lease	Operational data	CCJs or Court Decrees	Legitimate Interest
Determining Suitability to Lease	Operational data	Bankruptcy or NVA	Legitimate Interest
Determining Suitability to Lease	Operational data	Joint Occupiers	Legitimate Interest
Legal Obligation	Identity Details	Passport/driving licence/utility bill	Legal Obligation
Legal Obligation	Legal Requirement	Visa (if applicable)	Legal Obligation
Legal Obligation	Operational data	Resident permit if applicable	Legal Obligation
Legal Obligation	Legal Requirement	Proof of address	Contract
Entering into Contract	Verification	IP Address	Contract
Entering into Contract	Verification	Geo location	Contract
Entering into Contract	Legal Requirement	Reference Validation data	Legal Obligation

Marketing Properties	Contact Details	Full Name	Consent of the Data Subject
Marketing Properties	Contact Details	Email Address	Consent of the Data Subject
Marketing Properties	Contact Details	Phone Number	Consent of the Data Subject

We also retain your data for the purposes of marketing properties that may be of interest to you on the basis of your consent. You are able to withdraw that consent at any time by contacting us on the email address provided or by telephone.

Contractor and Suppliers

Engage Commercially	Contact Details	Name	Legitimate Interest
Engage Commercially	Contact Details	Address	Legitimate Interest
Engage Commercially	Contact Details	Phone number	Legitimate Interest
Engage Commercially	Contact Details	Email address	Legitimate Interest
Engage Commercially	Financial Details	Bank details	Legitimate Interest
Legal Obligation	Legal Requirement	Public liability Insurance	Legitimate Interest
Legal Obligation	Legal Requirement	Employee liability Insurance	Legitimate Interest
Marketing	Contact Details	Name	Legitimate Interest
Marketing	Contact Details	Email address	Legitimate Interest

We collect data in relation to your communications and interaction with us. This can include emails, text messaging, postal service delivery, social media posting or any other form of communication. In addition to the lawful purpose described previously for the above categories, we have a legitimate interest purpose to collect and retain this data to enable and improve our communication and for record keeping purposes.

The data we collect as data controllers from our data subjects is obtained directly from the data subject themselves.

Data recipients and data transfers

We do not sell any of your personal data to any third party. Where required, The Home Management Company share personal data with service providers such as our accountants and insurance companies. We may, as required, share your personal information with printing and mailing companies, as well as email service providers and other delivery companies. Your data will be transferred to secure servers in the USA for backup purposes.

Where required we will disclose your personal data with law enforcement and fraud prevention agencies. This is so we can help tackle fraud or where such disclosure is necessary for compliance with a legal obligation to which we are subject. Additionally, in order to protect your vital interests or the vital interests of another natural person, or in connection with the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. In particular, we will share your personal data with organisations which carry out referencing checks on our behalf.

Personal data in electronic form is held in EU or UK accredited data centres. Where data is transferred outside of the EEA, we ensure that the transfer is covered by an EU adequacy decision such as the USA Privacy Shield or through mechanism such as standard contractual clauses as approved by the EU.

Sensitive information

The Home Management Company does not process sensitive data as defined by Article 9 of the GDPR.

Retention policy

The data we collect directly from you is the minimum we require to facilitate the lawful processing described above. Personally Identifiable Data placed on our system will be deleted in accordance with legal obligations, such as HMRC requirements. Outside of that The Home Management Company has developed a retention policy to ensure personal data is held only for as long as is required for the purpose we collected it or for our legitimate purposes.

Generally, personal data required for financial transaction and audit purposes, including reporting to the HMRC will be retained for 6 years plus the current year it is collected.

Personal data collected for the purposes of engaging with suppliers will be maintained for the duration of the commercial relationship and for a further 7 years thereafter.

Data Storage and Security

The Home Management Company follows strict security procedures to ensure that your personal information is not damaged, destroyed, or disclosed to a third party without your permission and to prevent unauthorised access. We store both physical and electronic records. We have put in place technical and organisational measures to ensure our physical security as well as technical measures for data backup, authorisation and authentication onto systems. We use secure firewalls and other measures to restrict electronic access, including anti-virus and anti-malware measures. If the data must be transferred to a third party, we require them to have in place similar measures to protect your personal data. We have a process in place to mitigate the impact of any data breach that should occur.

Only persons who need the information to fulfil their duties are granted access to personal data. We may require you to cooperate with our security checks before we disclose information to you. You can update the personal information that you give us at any time by contacting us directly.

Your rights as a data subject

The regulations provide a number of rights to you as the Data Subject. The Home Management Company is committed to upholding those rights and those applicable to the personal information we collect and process are listed below. In addition to these rights, you have the right to escalate any concern to the Supervisory Authority, which in the UK is the Information Commissioners Office <https://ico.org.uk>. A full and detailed explanation of all rights can be found at <https://ico.org.uk/for-the-public/>

- **The Right to be Informed** – you should be clear about what, why and in what way your personal information will be processed at the time it is processed. This privacy policy sets out that information
- **Right of Access** – you have the right to know what personal information is held, by whom and why.
- **The Right to Rectification** – If the information we have collected and processed is inaccurate or incomplete, you have the right to have it rectified.
- **Right to Erasure** – You have the right to have your personal data erased and to prevent processing in some specific situations.
- **Right to Restrict Processing** - If you contest the accuracy of the personal data we hold, we will restrict the processing of your data until accuracy is verified.
- **Right to Data Portability** – You have the right to move, duplicate or transfer your data easily from one IT environment to another in a safe and secure way.
- **Right to Object** – You have the right to object to profiling and direct marketing
- **You also have rights in relation to automated decision making.**

You also have the right to lodge a complaint with the UK's supervisory body, The Information Commissioners Office www.ico.org.uk

Automated decision making

The Home Management Company does not use automated decision making to process personal data.

[Third party websites](#)

Our website may contain links to other websites. This privacy policy only applies to The Home Management Company., so if you follow a link to another website, you should read that organisations own privacy policy.

[Changes to our privacy policy](#)

We keep our privacy policy under review and we will place any updates on our website. This privacy policy was last updated in October 2019

[How to contact us](#)

You can write to us at this address:

The Home Management Company
116 High Street
Bushey
Watford
WD23 3DE

You can telephone us on this number:

020 8950 7497

You can email us by using this link:

info@homemanco.co.uk