



# Privacy Policy / Fair Processing Notice

(V.2 March 2021)

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

## Who am I?

**Pure Lettings (South East) Limited** of **7 St Benjamin's Drive, Pratts Bottom, Kent, BR6 7UX** take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number **ZA413838** and I/we am/are the data controller of any personal data that you provide to us.

Our Data Protection Officer is **Trevor Doran**

Any questions relating to this notice and our privacy practices should be sent to **info@pure-lettings.co.uk**

## How we collect information from you and what information I collect

We collect information about you from:

- Information contained in or relating to any communication that you send us through emails, text messages, in writing or in conversations between us in person over the telephone;
- Information you provide us when using any services, we provide, or that is generated during the use of these services;
- Information to help us comply with our legal and regulatory obligations, including reporting to and being audited by regulators and external auditors;
- Information to help us comply with court orders and to exercise and defend our legal rights;
- Any other personal information that may be sent to us and which we use for legitimate business purposes; and
- Data from third parties we work with including companies that introduce you to us, social media etc.

We collect the following information about you:

- Applicant/Tenant name, e-mail address, telephone number, Date of Birth, address (including any previous addresses), marital status, National Insurance Number, nationality, next of kin, name of university or college where you are studying (if applicable), the name of friends that you are staying with (if applicable);
- Guarantor name, e-mail address, telephone number, Date of Birth, address (including any previous addresses), marital status, National Insurance Number, nationality, next of kin (if applicable);
- Property address; term, rent, deposit, utility and service responsibilities;
- The employment status of tenants and/or guarantors, address, contact details (including email, phone and fax numbers) of the employer/accountant, payroll numbers, 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/loan agreements/credit cards or store cards that you have;
- Any welfare benefits that you may be eligible for or are currently on;
- Details about you that are in public records such as Electoral Register and information about you that is openly available on the internet; and
- Details about you that are stored in documents in different formats, including copies. For example, passport, driving licence, birth certificates, pay slips, tax returns, utility bill, council tax bill etc.

#### **Why we need this information about you and how it will be used**

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;
- to help you to manage your tenancy;
- to send statements, invoices and payment reminders to you or to collect payments from you;
- to carry out due diligence on any prospective tenant, including whether there are any money judgements against them, or any history of bankruptcy or insolvency;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our or supplies which may affect you;
- for compliance and to obey laws and regulations that apply to us;
- for good governance, accounting, managing and auditing our business operations;
- to respond to complaints and seek to resolve them;
- to monitor emails, calls, other communication and activities with reference to your tenancy; and
- for all other purposes consistent with the proper performance of our operations and business.

#### **Sharing of Your Information**

The information you provide to us will be treated by me as confidential and will be processed only by any of third party, acting on my behalf. Your data may be transferred to the following third parties consistent with the proper performance of our operations and business, all privacy policies are requested by us for these third parties and where provided are available for you on request:

- Your Landlord to enable them to make a fair and proper decision on whether to grant a tenancy.
- Local Tradesmen in order for them to arrange any maintenance works directly with you;
- Goodlord – Huguenot Place, Heneage Street, London, E1 5LN – 020 3198 2060 to carry out due diligence on you as a prospective tenant/ guarantor, including but not limited to the carrying out of affordability checks, due diligence checks and the obtaining of references from relevant parties, whose data you have provided and for Landlord and Tenant insurance policies, to provide your details to the local council and your utility companies at the beginning and end of your tenancy and to create and renew your tenancy agreements;
- ITEye Limited - 1 Recreation Rd, Bromley BR2 0DY - 020 8676 6670 who may require remote access to our computers when dealing with technical issues;
- Key-Data Gold - Key-Data House, Plas Llanfaelog, Ty Croes, Anglesey LL63 5TU - 01407 811155 to manage your tenancy using this property management software who also may require remote access when dealing with technical issues;
- Deposit Protection Service - The Pavilions, Bridgwater Road, Bristol, BS99 6AA - 0330 303 0030 for registering your deposit

We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- To any other third parties who process personal data on our behalf;
- To any other third parties who process data on their behalf but provide us or you with a service on behalf of us;
- 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;
- If you request so, your information shall be disclosed in order to determine if there are any money judgements against you, as the prospective tenant/guarantor, or to determine if they have a history of bankruptcy or insolvency;
- If you are unable to make payments under your tenancy, your information may be disclosed 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/utility provider, freeholder, factor, facilities manager or any other relevant person or organisation in connection with this;
- To any central or local government department and other statutory or public bodies, such as HMRC; and
- To any other successors in title to our business.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

### **Transfers outside the UK and Europe**

Personal data is predominantly stored and processed in the UK however, we may transfer your information outside the UK and/or EEA when storing information on cloud-based systems:

- Dropbox which is based in the USA. Dropbox complies with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, the European Economic Area, and Switzerland to the United States. You can find the Dropbox Privacy Shield certification at [www.privacyshield.gov/list](http://www.privacyshield.gov/list).

Where information is transferred outside the UK or EEA, we ensure that there are adequate safeguards in place to protect your information in accordance with this notice.

### **Security**

We will ensure that adequate safeguarding is in place to prevent unauthorised access, misuse or loss of your personal data.

All electronic personal data is stored on secure servers with relevant firewall controls.

All laptops and mobile phones are password protected.

All paper based personal data is stored securely and disposed of when required using document shredders.

Any personal data sent to us, either in writing or email may be insecure in transit so we cannot guarantee its delivery.

### **How long we will keep your information**

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract I have with you.

We will retain your data in accordance with legal and regulatory requirements.

We will only keep data as long as necessary and generally keep personal data for 7 years after our last contact with you.

Unsuccessful applicant's data will be destroyed after last contact.

### **Updating this Privacy Statement**

We will update this privacy statement from time to time therefore, we suggest that you review this on our website at regular intervals. Where substantial changes are made we will endeavour to inform you directly about these changes.

### **Your Rights**

You have the right at any time to:

- ask for a copy of the information about you held by me/ us in my records;
- require me/ us to correct any inaccuracies in your information;
- make a request to me/ us to delete what personal data of yours I/ we hold; and
- object to receiving any marketing communications from me/ us.

If you would like to exercise any of your rights above, please contact us at [info@pure-lettings.co.uk](mailto:info@pure-lettings.co.uk)

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

**England:**

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)

**Wales:**

Information Commissioner's Office  
2nd floor, Churchill House  
Churchill way, Cardiff, CF10 2HH  
Telephone: 029 2067 8400  
Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

**Scotland:**

The Information Commissioner's Office –  
Scotland  
45 Melville Street, Edinburgh, EH3 7HL  
Telephone: 0131 244 9001  
Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)

**Northern Ireland:**

Information Commissioner's Office  
3rd Floor, 14 Cromac Place  
Belfast, BT7 2JB  
Telephone: 028 9027 8757  
Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)

The accuracy of your information is important to me - please help us keep our records updated by informing us of any changes to your email address and other contact details.

**Contact Details:**

Pure Lettings (South East) Limited is registered in England and Wales under company number: 06887702. Its registered office is: Chart House, 2B Effingham Road, Reigate, RH2 7JN.

Email: [info@pure-lettings.co.uk](mailto:info@pure-lettings.co.uk)

Telephone: 01689 869 164

In writing: Data Protection Officer, 7 St Benjamin's Drive, Pratts Bottom, Kent, BR6 7UX

Tel: 01689 869164  
Mob: 07740 055025

Email: [info@pure-lettings.co.uk](mailto:info@pure-lettings.co.uk)  
Web: [www.pure-lettings.co.uk](http://www.pure-lettings.co.uk)