

Withers Kirk Consulting Ltd Privacy Notice

Our Privacy Notice describes the categories of personal data we process, and for what purposes we do this. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR).

The Privacy Notice will become effective 25th May 2018.

1. Introduction

- 1.1 We take your privacy seriously. You can find out more in this document about your privacy rights and how we collect, use, share and secure your personal identifiable information that includes the personal identifiable information we already hold about you now and the further personal information we might collect about you, either from you or from a third party. How we use your personal information will depend on the products and services we provide to you.
- 1.2 This Privacy Notice is a public document available to anyone when Withers Kirk Consulting Ltd obtain and use their personal identifiable information. It explains how we and appointed third party organisations/people use your personal identifiable information and it details your rights. We obtain your personal identifiable Information in order to conduct our normal business operations as a Property Management Company.
- 1.3 This Privacy Notice provides up to date information about how we use your personal information. We will make changes to this Privacy Notice if we make any significant changes affecting how we use your personal identifiable information, and if so we will inform you of these changes when they occur.

2. Our details

- 2.1 We are Withers Kirk Consulting Ltd, and we are the **Data Controller** of your personal identifiable information, as we determine the use of this Information.

3. Your privacy rights

- 3.1 From the 25 May 2018 you will have eight rights:
 - The right to be informed
 - The right of access
 - The right to rectification
 - The right to erasure
 - The right to restrict processing
 - The right to data portability
 - The right to object
 - Rights in relation to automated decision making and profiling.

3.2 In brief: you have the right to be informed as to who is obtaining and using your personal identifiable information, how this information will be retained, shared and secured, and what lawful grounds will be used to obtain and use your personal identifiable information. You have the right to object to how we use your personal identifiable information in certain circumstances. More details can be found at <https://ico.org.uk/for-the-public/personal-information/>
You also have the right to obtain a copy of the personal identifiable information we hold about you. In addition, you can ask Withers Kirk Consulting Ltd to correct inaccuracies, to delete or restrict personal identifiable information, or to ask for some of your personal identifiable information to be provided to someone else.

4. What kinds of personal identifiable information do we use?

4.1 We use a variety of personal identifiable information depending on the products and services we deliver to you. For all products and services, we need to use the following details relating to you as owner or tenant of your residential or business property:

Personal Information

- Contact details: name, address, email, home and mobile telephone numbers;
- On-line computer identification including IP address - information recorded data when you engage with us by email;
- Payment details: bank account, payment card details including account numbers, sort codes, names, card numbers, start and expiry dates. 3 digit security numbers are erased once payment has been processed.

5. How do we gather your personal data?

We obtain personal identifiable information by various means. This can be face to face, by email, telephone, correspondence and/or by receiving this information from others for example, managing agents by whom we are instructed to undertake rent, service charge and utilities collection on their client's behalf. We can also receive information about you from other people who know you and/or are linked to you, for example relatives or persons nominated to act on your behalf, or your legal representative.

6. How do we lawfully use your personal data?

6.1 We sometimes need to gather, use and share your personal identifiable information for particular reasons, which are set out in more detail below:

To operate and administer our property management systems

Contact information with third parties who help us deliver our rent and service charge collection and legal obligations.
FW Properties Ltd
Moore Stephens LLP

Kingsley Napley LLP
Larking Gowen LLP
Utility Companies

We use your personal identifiable information in this way because it is necessary to meet the conditions set out in the **contract/agreement** with you and/or to meet our **contractual, legal or regulatory obligations**.

7. Our legal basis for using your personal information

7.1 We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:

- we need to use the information to comply with our **legal obligations**;
- we need to use the information to perform a **contract** with you as instructed by a third party (for example, FW Properties Ltd); and/or
- we have a **legitimate interest** to use your information
- you have specifically given us 'affirmative' consent to use the information.

8. Sharing your personal information with or getting your personal information from others

8.1 We will share personal information with our employees at Withers Kirk Consulting Ltd and with others outside Withers Kirk Consulting Ltd where we need to do that to make products and services available to you, where it is fair and reasonable for us to do so. See section 6, How we use your personal identifiable information for more information.

8.2 Who we share your personal information with depends on the products and services we provide to you and the purposes we use your personal information for. For most products and services, we will share your personal information with our own service providers such as our IT suppliers In Touch Systems and Aylsham Computers. See section 6, how we use your personal information for more information on who we share your personal information with and why.

8.3 Most of the time the personal information we have about you is information you have given to us or gathered by us, in the course of providing products and services to you. We also sometimes gather personal information from and send personal information to third parties where necessary. See section 6, how we use your personal information for more information on who we get your personal Information from and why.

9. How we keep your Data safe

9.1 Your data is stored in the UK via Microsoft Office 2010 or later version.

9.2 Paper files are stored securely and disposed of in the timeframe set out in point 10 below.

9.3 Data stored on laptops/computers and mobile phones is password protected with passwords updated on a regular basis

10. How long we keep your personal information for

10.1 We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements, or for up to 7 years after our contact has expired.

11. Keeping you up to date

11.1 We will communicate with you using any contact details you have given us – for example by post, email, text message or WhatsApp.