

## Client and Leaseholders' Data and Data Protection Policy

### 1. Client and Leaseholders' Responsibilities

1.1. Each Client and Leaseholder is responsible for keeping his or her personal information up-to-date at all time and agrees to notify Brackenbury Property Management (BPM) as soon as reasonably practicable of any changes to his or her personal information. BPM will accept no liability for loss suffered by a Client and Leaseholder arising as a result of a Client and Leaseholders' failure to advise BPM of any changes to his or her personal information.

### 2. What Personal Information the BPM holds

2.1. BPM collects personal information about members (such as names, contact addresses and telephone numbers, date of birth, employer/company, history of payment dates, amounts and method (although please note that no card data is retained by BPM)), complaints history).

2.2. Occasionally BPM may receive information about a Client and Leaseholder from other sources (such as other professional bodies), which BPM may add to the information BPM already hold about that Client or Leaseholder in order to help us manage our relationship to the Client or Leaseholder.

2.3. BPM may retain copies of correspondence (letters/emails) or a note of communications with a Client or Leaseholder, regarding any aspect of services provided by BPM.

### 3. Sensitive personal information

3.1. BPM may ask a Member to provide sensitive personal information, for example in response to an equality and diversity questionnaire. If BPM requests such information, BPM will explain why BPM is requesting it and how BPM intends to use it.

3.2. Sensitive personal information includes information relating to:

- a Member's ethnic origin
- a Member's political opinions
- a Member's religious beliefs
- whether a Member belong to a trade union
- a Member's physical or mental health or condition
- a Member's sexual life, and
- whether a Member have committed a criminal offence

3.3. BPM will only collect or request a Client or Leaseholders' sensitive personal information in specific circumstances and with a Client and Leaseholders' explicit consent.

### 4. How will BPM use the information about a Client or Leaseholder?

4.1. BPM collects information about a Client or Leaseholder so that BPM can:

- identify a Client or Leaseholder, and manage the relationship of that Client or Leaseholder with BPM;
- provide our Clients and Leaseholders with details of the services that BPM provides;
- provide the services to which the Clients and Leaseholders are entitled;
- conduct research, statistical analysis and behavioural analysis;
- carry out Client and Leaseholder profiling and analyse Client and Leaseholders' preferences;

- let Clients and Leaseholders know about other products or services that may be of interest to a Member — see 'Marketing' section below;
- detect and prevent fraud;
- customise the BPM website and its content to Client and Leaseholders' preferences;
- notify Clients and Leaseholders of any changes to our services that may affect them;
- process security vetting if required;
- improve our services;
- obtaining Client and Leaseholders' feedback using surveys;
- obtaining Client and Leaseholders' opinions on specific topics as might arise from time to time;

4.2. BPM may send Clients and Leaseholders information by post, email, telephone, text message (SMS) about services that the Client or Leaseholder is entitled to receive.

## 5. Marketing

5.1. In addition to the information described in 3.2 above, BPM will send Clients and Leaseholders information by post, email, telephone, text message (SMS), social media, about events, competitions and special offers which may be of interest to Clients and Leaseholders, depending on what mailing preferences a Client or Leaseholder has stipulated.

5.2. Other businesses which BPM have selected carefully may also send a Client or Leaseholder similar marketing messages but only when a Client and Leaseholder has agreed to do so.

5.3. A Client or Leaseholder can opt out of receiving marketing from BPM and/or other businesses at any time. See 'What rights does a Member have?' below for further information.

6. Who a Client and Leaseholders' information might be shared with. BPM may disclose some aspects of a Client and Leaseholders' personal data as follows:

6.1. To other professional organisations in order to verify the status of the Client or Leaseholder, or in relation to any proceedings;

6.2. To law enforcement agencies in connection with any investigation to help prevent unlawful activity;

6.3. To our business partners in accordance with the 'Marketing and opting out' section above.

6.4 To the company whose software we use in order to provide our service. This company hold the data securely using Microsoft software, and following the principles of GDPR. They do not in turn provide the data to any other parties for the purpose of marketing, research or similar purposes.

7. Keeping Client and Leaseholders' data secure BPM will use technical and organisational measures to safeguard each Member's personal data, for example, BPM stores each Member's personal data on secure servers, and PCs.

## 8. What rights does a Client or Leaseholder have?

8.1. Right to request a copy of that Client or Leaseholders' information - A Client or Leaseholder can request a copy of the information which BPM holds (this is known as a subject access request) for them. If a Client or Leaseholder would like a copy of some or all of it, please:

- email, call or write to BPM
- let BPM have proof of identity and address (a copy of the Client or Leaseholders' driving licence or passport and a recent utility or credit card bill), and
- let BPM know the information the Client or Leaseholder wants a copy of.

8.2. Right to correct any mistakes in a Client or Leaseholders' information. If a Client or Leaseholder believes that BPM holds incorrect information, then please

- email, call or write to BPM
- let BPM have enough information to identify the Client or Leaseholder, and
- let BPM know the information that is incorrect and what it should be replaced with.

8.3. Right to ask us to stop contacting a Client or Leaseholder with direct marketing - A Client or Leaseholder can ask us to stop contacting them for direct marketing purposes. If a Client or Leaseholder would like to do this, please:

- email, call or write to us.
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- if it is only specific methods of contact which you wish to stop, let BPM know what method of contact you are not happy with (for example, you may be happy for us to contact you by email but not by telephone)

9. What happens to your data if you are no longer a client or leaseholder?

- Any data that BPM is obliged to retain is kept for the required period of time, but is then permanently deleted.
- Any data that BPM is not obliged to retain is permanently deleted.

10. Each Client and Leaseholder will comply with BPM's data protection policy when processing personal data relating to any employee, worker, customer, client, supplier or agent of BPM and, in particular, will not disclose Personal Data unless specifically authorised by BPM to do so.