

# Fair Processing Notice

(April 2018)

# Homematch

INDEPENDENT LETTING AGENTS

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

## Who am I?

Homematch Limited 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.

I am notified as a Data Controller with the Office of the Information Commissioner under registration number ZA221604 and I am the data controller of any personal data that you provide to us.

Our Data Protection Officer is;

**Lynda Martin**

Any questions relating to this notice and our privacy practices should be sent to;

**Lynda@homematch.me.uk**

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

I collect information about you:

- From your application for accommodation.
- From your use of the LETSXL forms for ID check/Right to rent. Credit referencing.
- Our referencing forms for your previous landlord & employers.
- Plus any other NLA Forms downloaded and completed from the NLA website (*including but not limited to creating tenancy agreements, guarantor agreements, or notice*).

I collect the following information about you:

- 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; and
- Any welfare benefits that you may be eligible for, or are currently on.

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

I 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 and our landlords;
- to enable us to supply you with the services and information which you have requested;
- to help you to manage your tenancy;
- to carry out due diligence on any prospective tenant, including whether there is 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; and
- for all other purposes consistent with the proper performance of our operations and business.

### **Sharing of Your Information**

The information you provide to me will be treated by me as confidential and will be processed only by any of third party, acting on my behalf, within the UK/EEA]\* I 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:

- If I 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 holiday cover is required in the office all security access will be kept to a minimum. Holiday cover will not include processing applications or sensitive information other than: name, address contact information for third party maintenance or emergencies.
- 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;
- 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;
- Contact information only but not limited to phone number and email to any trade arranging maintenance, gas safe, repairs or any other necessary certification for access or agreement to enter with keys;
- 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; and

- 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.

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

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

Your information will only be stored within the UK and EEA. I may transfer your information outside the UK and/or EEA for data storage only as notified below:

- **cloud server data TBA – application data / hard drive backups**
- **Outlook 365 iCloud server data – personal contact information only**
- **Google drive – photos of property only no personal data held**
- **Zoopla / Prime location – contact information as submitted online. Interest in a particular property.**

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

#### **3<sup>rd</sup> party security by Outlook**

<https://privacy.microsoft.com/en-us/privacystatement>

#### **Google**

<https://cloud.google.com/security/gdpr/>

#### **Zoopla / Prime location**

**TBA**

#### **Server for website**

**Via Hallam Internet – confirmed server UK based 23<sup>rd</sup> April 2018**

### **Security**

***Drafting Note: It is important that personal information is stored securely and appropriate technical measures are taken to protect this information. This section should set out details of the security measures in place.***

When you give me/us information I/we take steps to make sure that your personal information is kept secure and safe.

- Data is kept on a PC covered by ESET software & Malware.
- Access is passworded to myself only and on my smart phone passworded by code.
- The pc is backed up off line to 3<sup>rd</sup> Party storage.

- All data is held on a hard drive separate to the main information collected after termination of the contract.
- Homematch website is supported by IT Company and not linked to 3<sup>rd</sup> party software for data collection. The website does not accept or hold any personal information this is all completed by parity email, LETXL online submission.
- Contact information is gained from Zoopla / Prime location as submitted under their consent.
- Shared with suppliers for inspection/maintenance: Dinalls Property Services. Wilsosn Blue Flame. Any other trade as deemed necessary for the tenant and properties safety name/email & phone number only. Maintenance issues I am aware of.
- The office is at my home and locked access by 2 separating doors. Locked at all times when not in attendance myself.
- EPC information from registered site – property only.
- Server data from the website is hosted by: TBA
- Outlook data is on the cloud and serviced by:
- <https://privacy.microsoft.com/en-us/privacystatement>

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

I review my 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 (I/we may be legally required to hold some types of information), or as set out in any relevant contract I have with you.

My full retention schedule is;

### **Data Retention Schedule**

#### **Application information:**

Until termination of tenancy or renewal of any application information for any reason it is resubmitted then 6 years for accounting and tax purposes.

#### **Landlord Information:**

Until termination of management contracts then 6 years for accounting and tax purposes.

### **Data Disposal**

- All computer records are deleted from main drives and backup, plus recycle bins are emptied regularly
- All paper copies are shredded and are either recycled or incinerated onsite.

### **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 me at **Lynda@homematch.me.uk**

Should you wish to complain about the use of your information, I we would ask that you contact me/ 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 my/ 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 me keep my records updated by informing me of any changes to your email address and other contact details.