

PRIVACY POLICY

Privacy Notice provided by Clifford Dann LLP relating to: Clients, tenants, leaseholders, landlords, freeholders, suppliers, contractors, contacts and employees

This privacy notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you. We are required to notify you of this information under the General Data Protection Regulations (GDPR).

Please ensure you read this notice (occasionally referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you. This privacy notice contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

1. WHO WE ARE

Clifford Dann LLP collects, uses and is responsible for certain information about you. When we do so we are regulated under the General Data Protection Regulations which applies across the United Kingdom and European Union whereby we are responsible as 'controller' of that information for the purposes of those laws. In this privacy notice, references to 'we', 'us', or 'our' means Clifford Dann LLP

2. DATA PROTECTION PRINCIPLES

We will comply with the data protection principles when gathering and using personal information, as set out in our GDPR data protection policy.

3. THE PERSONAL INFORMATION WE COLLECT AND USE: INFORMATION COLLECTED FROM YOU

In the course of our business activities we collect the following information when you provide it to us:

- Names, telephone numbers, addresses, email addresses and bank details
- In order to manage and support our employees Clifford Dann LLP collects emergency contact details, national insurance number, employment and educational information and information from employer references.
- The provision of names, telephone numbers, addresses, email addresses and bank details is required from you to enable us to perform our duties in accordance with the contract we have with you and/or our client and/or our legitimate business interest. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

4. THE PERSONAL INFORMATION WE COLLECT AND USE: INFORMATION COLLECTED FROM OTHER SOURCES

We may also obtain personal information from other sources as follows:

- Names, telephone numbers, addresses, email addresses from banks and other financial institutions, Solicitors, Accountants, Credit Referencing Agencies, Her Majesty's Revenue and Customs (HMRC), other property professionals.
- For employees we also collect educational and employment information from previous employers and/or employment agencies.

5. HOW WE USE YOUR PERSONAL INFORMATION

We will typically collect and use this information for the following purposes:

- For the performance of a contract we have with you and/or our client.
- For the purposes of our legitimate interests or those of a third party, but only if these are not overridden by your interests, rights or freedoms.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

6. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share the following categories of personal data:

- Names
- Telephone Numbers
- Addresses
- Email addresses

This personal information may be shared with the following categories of recipients:

- Accountants and Auditors, Banking Institutions, Companies House, Contractors, Councils and Local Authorities, Courts & Tribunals, Credit and Debt referencing and collection agencies, Email providers, Energy Assessors, HMRC, Information Commissioners Office, Insurance Brokers and Companies, Landlords, National Crime Agency, Tenants, Managing Agents, Tenancy Deposit Schemes, Ombudsman Services, Clifford Dann Management Limited, Royal Institution of Chartered Surveyors (RICS), Independent Surveyors and Valuers Association (ISVA), Software Providers, Solicitors, Utility Companies.

For employees of Clifford Dann LLP we may also share information with:

- Pension Providers, Employment benefit providers, Payroll providers, Advisory Conciliation and Arbitration Service.

This data sharing enables us to perform our duties in accordance with the contract we have with you and/or our client. Or where there is a legitimate interest to enable us to perform our duties.

We will share personal information with law enforcement or other authorities if required by law.

We will not share your personal information with any other third party.

7. WHERE YOUR PERSONAL INFORMATION MAY BE HELD

Information may be held at our offices and those of Clifford Dann Management Ltd, and third party agencies, service providers, representatives and agents as described above.

We have security measures in place to seek to ensure there is appropriate security for information we hold including those, measures detailed in our GDPR data protection policy.

8. HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

- We will hold names, addresses, telephone numbers, email addresses and bank details and in the case of employees National Insurance Numbers whilst the contract with you is in place. Once the contract is terminated we are required, by law, to hold information for a period of six years.
- Legally we are required to hold financial data re leases for a period of twelve years.

9. REASONS WE CAN COLLECT AND USE YOUR PERSONAL INFORMATION

We rely on CONTRACT as the lawful basis on which we collect and use your personal data.

We rely on legitimate interest as the lawful basis where we require personal details for dealings with third parties in order for us to be able to honour our contract.

10. YOUR RIGHTS

Under the General Data Protection Regulation you have a number of important rights. In summary those include rights to:

- Fair processing of information and transparency over how we use your personal information.

- Access to your personal information and to certain other supplementary information this Privacy Notice is already designed to address.
- Require us to correct any mistakes in your information we may hold.
- Require the erasure of personal information concerning you in certain situations.
- Receive the personal information concerning you which you have provided us with in a way which that data is easily transmitted to a third party in certain situations.
- Object at any time to processing of personal information concerning you for direct marketing.
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
- Object in certain other situations to our continued processing of your personal information.
- Otherwise restrict our processing of your personal information in certain circumstances.
- Claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the GDPR.

If you would like to exercise any of those rights, please:

- Write to: The Data Protection Manager, Clifford Dann LLP, Albion House, Lewes, BN7 2NF. Tel: 01273 477022 or email: lewes@clifforddann.co.uk
- Let us have sufficient information to identify you
- We may ask you to let us have proof of your identity and address
- Let us know the information to which your request relates, including any account or reference numbers.

11. KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

12. HOW TO COMPLAIN

We hope we can resolve any query or concern you raise about our use of your information. Please see below in section 14 'How to Contact Us' if you have a query or concern regarding this policy.

The General Data Protection Regulation also gives you a right to lodge a complaint with a supervisory authority where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

13. CHANGES TO THIS PRIVACY NOTICE

We may change this privacy notice from time to time.

14. DO YOU NEED EXTRA HELP

If you require this policy in another format then please contact us as in 15 below.

15. HOW TO CONTACT US

- Write to: The Data Protection Manager, Clifford Dann LLP, Albion House, Lewes, BN& 2NF. Tel: 01273 477022, email: lewes@clifforddann.co.uk
- Let us have sufficient information to identify you.