



TENNANTS

Privacy Notice 1.4

Effective Date: 16-03-2021

PRIVACY NOTICE 1.4

Tennants is committed to protecting and respecting your privacy. We adhere to this Privacy Notice (the "Notice") which together with any disclaimers sets out the basis on which any personal data relating to you ("Data") we collect from you (or that you provide to us, or that is provided to us) by any means will be processed. Please read the following carefully to understand our use of Data. Please note that the Policy relates only to living individuals in relation to Data relating directly to themselves, and not to persons in any other capacity.

We are providers of letting and property management services.

We are for the purpose of the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (the Acts) insert Company name is/ are the data controller of your personal data and registered in the UK with the Information Commissioner's Office with the registration number: Z8790481

This Notice is split under several headings - if you click on a heading you will be taken directly to that section. More detailed information is available in several sections, or on request in some instances.

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1. Who we are and how to contact us

We are Tennants, which is the trading name of Tennant Property Lettings Ltd, Private Company Limited by shares (LTD) or (Ltd) Company registered in England 04453368 and having its registered office at Registered Office: Railview Lofts 19c Commercial Road Eastbourne BN21 3XE.

The **CONTROLLER** for the purposes of the the UK General Data Protection Regulation (UK GDPR), and the UK Data Protection Act 2018 is Tennants .

For data protection issues, please email Miles Batty at enq@tennants.co

Or write to us at:

22 New Upperton Road Eastbourne BN21 1NU

Tel: 01323 726687

2. What information about me do you collect & use ? Where do we get your personal data from ?

"Personal data" is data which can identify you, either directly or indirectly, as an identified or identifiable individual.

When you engage with us via the website, or by letter, telephone or personally, we collect personal data in accordance with the law, such as your name, address, contact details and purpose of your enquiry or concern.

We also collect data directly from you when you or your firm become a customer of Tennants.

This information can include, but is not limited to:

- name, addresses, email address and telephone numbers; ID, financial and employment information that you disclose when agreeing to register as an applicant or enter in to a transactional relationship with us.
- Information required to help us ensure our staff are safe when attending external appointments such as viewings at properties and market appraisals; for example contact details for the client or customer.
- Information required to comply with legislation such as "Right to Rent" checks required under Section 22 of the Immigration Act 2014 if you are renting a property.
- Information to enable us to find you a suitable property in line with your requirements.
- If you contact us, we may keep a record of that correspondence and ask for information if you report an issue with our services, or with a property you are renting.
- When you visit or otherwise access our website, details including but not limited to:
 1. information about the device and browser (hereafter "Device") you are using to access the website e.g. type, version, operating system, etc.
 2. traffic data including the URL of the website that referred you to our website if applicable,
 3. location data including geolocation (this can be controlled in your Device)
 4. weblogs and other communication data
 5. your IP (Internet Protocol) address
 6. the date and time of the visit and how long you remained on our website
 7. the pages visited on our website and interactions performed

The personal data we collect includes the following:

- Your full name and any previous names.
- Home addresses (current and previous).
- ID as required by law.
- Marital status.
- Email address.
- Home and work phone numbers.
- Mobile numbers.
- Work address and contact details.
- Occupation and status in employer's firm.
- Length of time in current occupation and salary/income information.
- Financial information about you, including your bank account details, debit card details, and other payment details. Details of benefits/ funds/savings/investments/property ownership.
- Details of contracts you have entered into with third parties for us to provide services to you.
- Details of Indemnity insurance (suppliers).
- Any other data which you ask us to process on your behalf, or which is necessary for us to process in order to fulfil our role in providing our products or services to you.
- Images and video data via security cameras located on the premises.

We may also obtain personal information that you post on social media, such as Facebook, LinkedIn, Twitter etc. If we do this it will be in line with a social media policy.

Please keep in mind that if you directly or indirectly disclose personal information or sensitive data through social media, this information may be collected and used by others. We have no control over such social media websites, and this Privacy Notice does not apply to such data. You should consult each site's Privacy Notice for information about their processing.

For full details of your rights in connection with the personal data held by us, please ask for our Data Subjects Rights Policy by emailing enq@tennants.co and we will help you as much as we can.

3. Do we offer our services directly to children (under 13yr olds) ?

The services are not directed to children under the age of 13 years and we request that such individuals do not provide personal data to us. We do NOT collect any data from children and if we discover that we inadvertently have such data we will immediately delete it.

4. How and why do use my personal information ?

Tennants will process your information for the purposes as set out in this Notice, in particular :

- To operate our website and deliver the response, product or service you have requested.
- To provide to you our full range of products and services.
- Carry out any contractual and legal obligations.
- To promote and organise our business and interests.
- To inform you of other products or services available from us.
- To contact you to conduct research about your opinion of our existing products or services or possible new offerings that we may be considering.
- To contact you on behalf of other business partners about offers or services we believe may be of interest to you (we will not disclose your personal data without your consent).
- In addition, we share data with trusted suppliers in order to assist us; operate our business, provide customer support, provide IT and communication services to us, to provide security services to us, to perform statistical analysis, to contact you via email, phone, text or by post. All such third parties are prohibited from using your personal information except to provide these services to us, and they are required to maintain the confidentiality of your information.
- We will also process your data to comply with any legal obligation to which we may be subject, and to obey any Court Order.

5. Do you share my information ?

Your data is shared as necessary within Tennants for business purposes such as internal administration, invoicing, providing you, your organisation or company with our products, and as set out below.

We do not sell, rent, or otherwise share personal data with unaffiliated entities for their independent use except as expressly described in this Privacy Notice or with your prior consent.

We share data with our third-party service providers that perform services on our behalf, such as:

- Web-hosting companies.
- Accountants.
- Analytics providers.
- IT service providers.
- Cloud storage providers.
- CCTV monitoring partners.
- Maintenance contractors.
- Utility suppliers.
- Reference agencies.
- Insurance providers.
- Local Authority (council).
- Inventory providers.

We would also share with service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a transaction in which we are acquired by or merged with another company or association, or we sell, liquidate, or transfer all or a portion of our assets.

All such sharing takes place only to the extent necessary to perform the services carried out for or on our behalf, and making sure that they comply with data protection law.

All such third parties are prohibited from using your personal information except to provide these services to Tennants and they are required to maintain the confidentiality of your information.

Tennants will otherwise disclose your personal information, without notice to you, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Tennants or the website; (b) protect and defend the rights or property of Tennants and its staff; and, (c) act under exigent circumstances to protect the personal safety of staff or users of the services or facilities of Tennants or the public.

6. Is my information sent outside the European Union ?

The personal data that we collect from you may be transferred to and stored outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of our suppliers, in which case the third country's data protection laws will have been approved as adequate by the European Commission, or other applicable safeguards are in place as set out in the the UK General Data Protection Regulation (UK GDPR) and UK Data Protection Act of 2018.

These safeguards are set out below: -

Where landlords live overseas.

7. What is the legal basis for you collecting and processing my information ?

The Data Protection ACT 2018 and the UK General Data Protection Regulation (UK GDPR) sets out the grounds upon which data controllers such as Tennants can rely on to lawfully process personal data.

We rely on the following grounds:

Where you have given us **consent** to the processing of your personal data for a specific purpose, for example for marketing purposes;

The processing is necessary for Tennants to fulfil our **contract** with you.

The processing is necessary for **compliance with a legal obligation**, for example to comply Revenue requirements;

The processing is necessary in order to protect the **vital interests** of a staff member or another person, for example, an attendee at a training course in a medical emergency;

The processing is necessary for the purposes of the **legitimate interests** pursued by Tennants or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, (especially a child). Some marketing might take place under this heading, but never to children, unless to oversight;

Under the UK Data Protection Act of 2018, we may also lawfully share data for the following reasons; Equality of opportunity or treatment, Racial and ethnic diversity at senior levels of organisations, Regulatory requirements relating to unlawful acts and dishonesty etc, Suspicion of terrorist financing or money laundering, Support for individuals with a particular disability or medical condition, Insurance.

In relation to personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation only, the processing relates to personal data which are manifestly made public by the data subject:

The processing is necessary for the establishment, exercise or defence of legal claims;

The processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional when those data are processed by or under the responsibility of a professional subject to the obligation of professional secrecy under Union or Member State law or rules established by national competent bodies or by another person also subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies;

8. What are my rights, and how do I exercise them ?

Below we outline the rights you have in relation to the data we hold about you. If you would like to exercise any of these rights please ask for our SUBJECTS' RIGHTS POLICY and FORMS by emailing enq@tennants.co which will help you to exercise any of the rights outlined here:

Access - you have the right to find out what data we hold about you, and to get a copy of the data;

Restriction of Processing - you have the right to ask us not to process some data, or not process in a particular way, in certain circumstances;

Right to object - you have the right to object to our processing of your data when we are processing it on the basis of our legitimate interests, for direct marketing purposes, or for statistical purposes;

Right to data portability - if we are processing by automated means your personal information that you gave us, on the basis of your consent or on the basis that it is necessary for the performance of a contract with us, you may ask us to provide the personal information to you in a machine-readable format;

Right of Rectification - if you believe that data we hold about you is inaccurate then you have the right to ask us to change and or correct it;

Right of erasure - in certain circumstances, you have the right to ask us to erase the information we hold about you. You can also ask that if we have made information about you public or shared the information with third parties that we use reasonable effort to erase that information also, these are not an unlimited right, and we can discuss the issue with you if required;

Complaint - you have the right to complain to the Information Commissioner's Office if you feel that we are in breach of any of your rights. **We would ask that you contact us first by emailing enq@tennants.co, to enable us to try to deal with the matter to your satisfaction.**

INFORMATION COMMISSIONER'S OFFICE

Cheshire (Head office)

Wycliffe House
SK9 5AF
Wilmslow

Scotland

Queen Elizabeth House
Sibbald Walk
Edinburgh
EH8 8FT.

Phone 0303 123 1113

Live chat: [Online](https://bit.ly/37F4I5W) <https://bit.ly/37F4I5W>

Wales

2nd Floor, Churchill House
Churchill Way
Cardiff
CF10 2HH

Northern Ireland

3rd Floor
14 Cromac Place
Belfast
BT7 2JB

9. Can I stop getting emails, text messages and other communications from you ?

Yes !

If you no longer wish us to contact you in a particular way, e.g. no longer send you text messages, just advise us of that and we will respect your request.

In an emergency, for health and safety reasons or for legal reasons.

MARKETING

If you no longer wish to receive marketing communications by electronic means, just use the opt-out facility in any of our communications, OR advise us at: enq@tennants.co.

You may also write to us or telephone us at:

Tennants

22 New Upperton Road Eastbourne BN21 1NU Tel: 01323 726687

10. Is my information secure ?

Tennants secures your personal information from unauthorised access, use or disclosure.

Tennants secures the personal data you provide on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure.

When personal data is transmitted to other Web sites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

Documents or copies which are held by Tennants are always kept in secure lockable storage and, where deemed necessary, this should also be fireproof, and access is restricted to those who require such access.

Data is retained only for as long as is necessary for the purpose for which it was obtained.

Electronic data is encrypted.

11. How long do you keep my information ?

Tennants will retain personal data only for as long as such retention is necessary having regard to the purpose for which we have collected it in the first place, or as long as is required by law.

Tennants will retain customer personal data for as long as any person or firm is a customer of Tennants.

If a person or firm ceases to be a customer of Tennants their personal data will be retained for as long as is necessary to process any existing customer transactions or legal requirements, or as long as it may be required under any relevant legislation and in line with our Retention Policy and Schedule.

Certain data is required by law to be maintained for specific minimum periods and Tennants will retain such personal data for the period mandated by each specific law.

Data relating to employees is kept for the duration of employment and specified periods thereafter in accordance with our internal Retention Policy.

If you would like further information in respect of a particular category of data relating to you, please contact: enq@tennants.co

or contact us at :

Tennants,

22 New Upperton Road Eastbourne BN21 1NU Tel: 01323 726687

In line with this Notice and our Subject Rights' Policy, we aim to respond to all such requests within 1 month.

12. How do I contact the Information Commissioner's Office?

You have the right to complain to the Information Commissioner's Office if you feel that we are in breach of any of your rights.

Full contact details are provided below.

We would ask that you contact us first at enq@tennants.co or 22 New Upperton Road Eastbourne BN21 1NU Tel: 01323 726687 to enable us to try to deal with the matter to your satisfaction. If you wish to exercise any of the rights you have in respect of your data, please ask for our Data Subject Rights' Policy and Forms by emailing enq@tennants.co and we will help you as much as we can.

INFORMATION COMMISSIONER'S OFFICE

Cheshire (Head office)

Wycliffe House
SK9 5AF
Wilmslow

Scotland

Wales

2nd Floor, Churchill House
Churchill Way
Cardiff
CF10 2HH

Northern Ireland

Queen Elizabeth House
Sibbald Walk
Edinburgh
EH8 8FT.

3rd Floor
14 Cromac Place
Belfast
BT7 2JB

Phone 0303 123 1113

Live chat: [Online](https://bit.ly/37F4I5W) <https://bit.ly/37F4I5W>

Notice Review

The notice will be reviewed and evaluated from time to time. Ongoing review and evaluation will take cognisance of changing information or guidelines, legislation and feedback from staff and others.

If this policy changes the relevant people will be notified. Any questions about this notice should be referred to the privacy lead within the company who is in charge of administering, enforcing and updating this notice.