

Privacy notice for customers

Layzell is residential letting agent and block/leasehold/open space managing agent based in Trowbridge providing homes and block management services in Wiltshire and Somerset. Layzell is committed to respecting your right to privacy and to processing your personal information in a lawful, fair and transparent way. As a Data Controller, all personal data we hold about you will be processed in line with the General Data Protection Regulations ('GDPR') and data protection laws.

The following summarises:

How we use personal data

- What personal data we need
- Why we need it
- How we use it
- Who we might share it with, and
- How long we will keep it for

It also sets out the rights you have regarding any of the personal data held by Layzell. From time to time we may update this Notice. Any updates will be posted on our website.

What is personal data?

Personal data is any information relating directly or indirectly to a living individual. This information includes things such as a name, an identification number, location data, online identifier or factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

What personal data do we process?

We only collect personal data for specific, clear and legitimate purposes and we will not process it for purposes that differ from those we have notified you about. We will limit our use of your personal data to what is needed, relevant to, and necessary for the purposes we have identified. Access to your personal data is given only to those who need to process it for the purposes identified. We will ensure that we keep your personal data accurate and up to date, and will not store it for longer than is necessary.

The types of personal data we collect includes (but are not limited to):

Name, address, phone number(s), email address(es), other identifiers (for example social media user names), financial, medical/health, behavioural, criminal

offence/conviction, religious beliefs, trades union membership or political opinions, images, CCTV, audio recordings, location data, disability information, profiling information and other information such as next of kin and copies of ID documentation.

We collect this information in a number of ways, including (but not limited to):

Information we collect directly from you, for example when you:

- interact with our website and social media platforms
- become a customer
- access your account online
- make an enquiry
- book a repair
- participate in surveys
- attend meetings with us
- purchase services or products from us
- raise a complaint or request
- participate in our events
- attend our business premises covered by CCTV

We also collect information from third party sources, for example, credit referencing agencies, landlord and other references, data analysis companies and local authorities.

Why do we process personal data?

Our processing of your personal data is necessary for us to provide services to you, maintain our relationship with you and to fulfil our legal obligations. We use personal data for the following reasons:

- Finding you a suitable home
- Managing your property and delivering home improvements
- Managing tenancies and compliance
- Health, safety and wellbeing
- Managing enquiries

- Managing your accounts
- Supporting you in your home
- Managing our suppliers and contractors
- Improving customer experience
- The management and governance of our businesses

- Fulfilling our legal obligations

- **How do we process your personal data?**

The GDPR gives companies a number of lawful reasons to collect and process personal data. Below are the lawful reasons we rely upon and the types of processing activities that relate to each:

Performance of a Contract:

In some circumstances it is necessary to process your personal data in order to fulfil our contractual obligations with you. Without this information we would not be able to provide a service to you. For example:

- Administering leasehold and freehold properties
- Pursuing overdue payments
- Managing and delivering repairs
- Issuing notices
- Administering customer accounts
- Making payments to customers and suppliers
- Tenancy compliance and management
- Managing tenancies and Estates queries
- Creating and administering tenancy agreements and lettings
- Trade enquiries and requests and managing subcontractors/suppliers

Legal Obligation:

In some circumstances it is necessary to process your personal data so we can comply with our legal obligations. Without this information we would not be able to fulfil our legal obligations to you, the authorities, or regulatory and statutory bodies. For example:

- Service of notices in connection with residential and or commercial property management
- Supplier/subcontractor compliance
- Preparation of legal matters
- Risk and assurance, including fraud monitoring and investigation
- Tenancy/lettings management and administration, for example processing ID
- Home Safety compliance and complaint resolution
- Providing support to and protection of customers, for example administering safeguarding procedures

Legitimate Interest:

There are situations where processing your personal data is necessary to pursue our legitimate interests as a business. We have to balance our interests as a business with yours as an individual, so that our legitimate interests do not override your interests, rights or freedoms. For example:

- Planning and delivering home improvements
- Delivering health and safety standards
- Conducting surveys and reports including customer feedback surveys and quality assurance
- Managing our properties and tenancies
- Administering customer accounts and properties
- Providing customer support
- Receiving and recording enquiries from the public, customers and suppliers and administration

- Recording calls for monitoring, training, complaint and auditing purposes
- Recording images via CCTV or other photographic means and noise monitoring for security and investigation purposes
- Carrying out audits, quality assurance and maintaining databases
- Investigating, monitoring and reporting issues and reportable events
- Managing complaints and enquiries
- Lettings management, for example administration of credit checks and referencing
- Tendering and procurement processes
- Supplier and subcontractor checks and administration
- Generating records in the course of carrying out our business activities, including notes, meeting minutes and associated documentation, general correspondence
- Organising, planning and administering events
- Processing details of properties and tenants on Layzell's systems
- Customer segmentation analysis
- Sending customers information about Layzell services via email, text, social media and letter
- Providing customers with translations and interpretations
- Analysing traffic to our website
- To facilitate colleague training and improvement

Consent:

In some situations, we will ask you for your consent to collect and process your personal data, for example:

- When you interact with us via our website and social media
- Through cookies when interacting with our website

- Attending events
- Requests from customers
- Taking photographs for publicity
- Customer support in connection with tenancy compliance
- Recording third party permissions

Vital Interests:

Occasionally, we may need to process your personal data when it is necessary to protect your life, for example, in an emergency situation where you cannot give consent.

Special category data:

Sometimes, we will need to process more sensitive personal data, known as 'Special Category' data. This type of information includes personal data about your race, ethnic origin, political opinions, religious beliefs, trade union memberships, biometrics, health/medical information and sexual orientation. When we collect and process this data we will rely on the following additional purposes to process it:

- Explicit consent
- Employment law
- Already made public by you
- Legal claims
- Public interest

Sometimes it will be necessary to process personal information relating to criminal prosecutions, proceedings, sentencing or convictions. In those circumstances we will rely on the additional grounds to process this personal data:

- Consent
- Protecting vital interests
- Already made public by you
- Legal claims

Who we share your personal data with:

In order to provide you with a service and to fulfil our business objectives and obligations, there are many situations where it is necessary to share your personal data with third parties. In such circumstances we will share your data with the following categories of organisations/individuals:

- Regulatory, legal and compliance, such as the Department for Work and Pensions, legal representatives, auditors
- Suppliers and contractors such as, mortgage advisors, trades and sites, subcontractors, trades or organisations tendering for work
- Referencing and credit checking companies
- Utilities companies
- Housing associations
- CCTV, security and safety device providers
- Local authorities, police, social services
- Service providers and software companies, such as Microsoft and in-house providers
- Other colleagues, departments and companies within Layzell

How long will we keep your personal data?

We will only keep your personal data for as long as necessary and for the purpose for which it was collected. When it is no longer necessary to keep your personal data we will delete it. Our policy for deciding how long we keep personal data is based on best practice guidance and our legal obligations.

Examples:

- When we obtain your bank details to make a refund we will destroy the personal data once the refund has been processed
- Personal data collected from credit checks is kept until the start of a tenancy or acceptance of it

- Tenancy agreements will be retained for six years after the end of the tenancy to comply with our legal obligations and industry guidance

Sometimes, we may need to retain data for analytical, statistical or research purposes.

Your data rights:

You have the following rights over your personal data:

The right to request:

- Access to your personal data free of charge, unless the request is unfounded or excessive.
- Correction of your personal data if it is inaccurate or incomplete.
- To have your personal data deleted or removed where there is no good reason for processing to continue.
- Processing of your data to be restricted, subject to certain criteria.
- Your data is moved, copied or transferred to another platform, subject to certain criteria.

If you make such a request, we will respond to it within one month of your request. In some circumstances we may require an extension to this time period and will notify you of the reasons for this. If we refuse your request, we will inform you of the reason(s) and of your right to complain to the Information Commissioner's Office (see details below) within one month of your request.

You also have the following rights:

- To object to us processing your personal data where we have relied upon legitimate interests to process, subject to certain criteria.
- Not to be subject to a decision made on the basis of automated profiling, if that decision produces legal or a similarly significant effect on you, subject to certain criteria.

The right to withdraw your consent:

Where you have given consent for us to process your personal data, you have the right to withdraw your consent at any time. Please contact us at the email or phone number below.

Direct Marketing

You have the right to object to us processing your personal data for direct marketing purposes. If you would like to stop receiving our marketing communications, please contact us at the email or phone number below.

Checking Identity

In order to protect confidentiality we will ask you to verify your identity before responding to any request made under this privacy notice. If a third party makes a request on your behalf, we require proof that you have given your permission for them to act on your behalf.

Contact details for further information

The registered office for Layzell is: Mitre Court, 45 Duke Street, Trowbridge, BA14 8EA.

If you have any queries or questions about the data we hold about you, please contact our Data Protection Officer Joanne Snook-Haldane at info@layzell.biz or phone 01225 571611.

Contacting the Information Commissioner's Office

If you are unhappy with the way we have handled your personal data or our response to a request you have made to us, you have the right to complain to the Information Commissioner's Office:

Information Commissioner's Office details:

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

0303 123 1113

casework@ico.org.uk

www.ico.org.uk/concerns