

General Data Protection Regulations - Leaseholder Privacy Notice

Data Controller

Cosgroves 49-51 Osborne Road Southsea Hampshire PO5 3LS
02392827827
info@cosgroves.co.uk
ICO Registration Number: Z2704058

Your Personal Data We will hold and process your personal data as leaseholders and (where applicable) that of your tenants, for contractual and/or legitimate reasons as a Management Company. Therefore, your personal data may be shared with third parties to include but not limited to accountants, Companies House, solicitors during sale or purchase of properties, debt-collection and tracing agencies, Cosgroves staff members, Freeholder and Freeholder representatives, letting and managing agents, suppliers and service providers (including gas, electricity and water companies), contractors, car parking companies, and software systems, to ensure the efficient management of the block. This does not necessarily mean that we share information with all of the above but we may do so if required. We also have data processing agreements in place with the contractors we use to further protect your data.

In order to comply with our legal obligations as a Management Company we will process your data including: *

Collection of service charges and any additional contributions as otherwise agreed (eg at AGMs)

* Maintenance of properties and the grounds

* Provision of paperwork in relation to the management of your property (invitations to, agendas for and minutes of AGMs and Directors Meetings) financial documentation (budgets, service charge requests, standing order forms, end of year accounts)

* Maintaining accounts and records, including refund of any overpayments due to leaseholders

* Information provided or requested by solicitors during sale or purchase of properties

We will also hold and process your personal data for any lawful reason required such as a law enforcement or a HMRC request. We will not share your personal data with any other third party not connected with the management of the block without your explicit consent.

What information we hold We hold personal information and sometimes sensitive personal information about leaseholders and their tenants (if applicable). This could be any combination of the following types of information:

- Full name/previous names, Date of Birth, Spouse/partner details, Details of dependants, Next of kin
- Postal contact details (including previous addresses and forwarding addresses)
- Telephone contact details & Email Address
- Personal correspondence with our company
- Copy of photographic and non-photographic identification documents (appointed directors only)
- Employment details/mothers' maiden name/place of birth/nationality/country of residence (appointed directors only)
- Bank account details (to be used for refunds or preparing standing order mandates only)
- Car description and number plate details
- Relevant information relating to health and wellbeing

How is information collected? All members of staff at Cosgroves collect information in order to carry out their job. Information is collected through several means including but not limited to recorded phone conversations, emails, written correspondence, information provided and requested by solicitors during sale and purchase of properties, information provided and requested at AGMs and other meetings, information submitted through our website and social media, utility companies, public and government bodies.



Where we hold information All information collected by our company is held on our secure servers. It is backed up regularly and both servers and back up servers are located within the UK. We hold a hard copy of various pieces of information as required by law; these are located within locked cabinets stored in our locked office, located at our block management office 32-34 Osborne Road Southsea PO5 3LT. Our computer systems are protected by passwords which are regularly changed and all computers are locked when not in use. Personal information is not left openly on desks within the office, and all loose paperwork is locked in a cabinet each evening. All computers have up to date anti-virus software installed. We have a data processing agreement in place with any technicians accessing our database software for the purposes of IT support.

How long we hold your information We will only hold your personal information as long as we deem necessary or as required by statutory law. After this time, your information will be securely destroyed. We will not contact you using your information for any other reason than your legitimate interests.

Right to Deletion You have the right to request that all your personal data we hold is deleted. Such a request can be sent to the above address or email, where we will confirm deletion or if not possible, explain the legitimate or lawful reasons why such a request cannot be actioned within 7 working days of receipt.

Right to Rectification You have the right to request that we amend any personal data we hold for you if you believe it is incorrect. Such a request can be sent to the above address or email, where we will confirm rectification or if not possible, explain the legitimate or lawful reasons why such a request cannot be actioned within 7 working days of receipt

Subject Data Access Request You have the right to request at any time, confirmation of the actual personal data we hold for you, and how this has been processed. Such a request can be sent to the above address or email which will be actioned within 7 working days of receipt.

Complaint In the first instance, if you have any complaint about how we hold or process your personal data, then please contact us at the above address or email. If you are still dissatisfied with our response, then you have the right to contact the Information Commissioners Office (ICO) at the following website <https://ico.org.uk/> quoting our ICO registration number which can be found above.

Rights under the GDPR as a data subject

Under the GDPR, you have the following rights:

- 1) The right to be informed
- 2) The right of access
- 3) The right to rectification
- 4) The right to erasure
- 5) The right to restrict processing
- 6) The right to data portability
- 7) The right to object
- 8) Rights in relation to automated decision making and profiling

More information on these rights can be found at: <https://ico.org.uk>

