

Privacy Notice
for Customers

+ TOGETHER
Property Management

PRIVACY + YOU



Together Property Management Limited is committed to the protection of the data which it holds. This policy explains what information we collect, how we collect it, hold it, process it and for what purposes.

Please ensure that you read this document carefully.
If you have any queries please contact us at
dataprotection@togetherproperty.co.uk

WELCOME+ INTRODUCTION

Contents

Introduction	2
Definitions	3
What is a Data Subject?	
What is Personal Data?	
What is a Data Controller?	
What is a Data Protection Officer?	
Company Info	4
Data Controller/Data Processor	4
Who does this policy apply to?	4
What do we collect and how do we use it?	4
Changing your details	4
Subject Access Request (SAR)	5
Timeframe	
Fees	
How information will be provided to you	
Large requests	
Data Controller/Processor	
Data Map	6
Grouping	7
Collecting Personal Data	8
Sharing information	8
Our Privacy Promise	9
Data Protection queries and complaints	9

What is a Data Subject?

The Data Subject is a living individual to whom personal data relates. For the purposes of this Privacy Notice the Data Subject is any customer of Together Property Management Limited.

What is Personal Data?

As described by Article 4 in the GDPR Definitions 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, or an online identifier.

What is a Data Controller?

A Data Controller is the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by EU or Member State laws, the controller may be designated by those laws.

What is a Data Protection Officer?

A data protection officer (DPO) is required by the General Data Protection Regulation (GDPR) for companies with over 250 employees. Although Together Property Management does not meet this criteria, we have appointed a DPO voluntarily. Data protection officers are responsible for overseeing data protection strategy and implementation to ensure compliance with GDPR requirements.

DEFINITIONS





Company Info

Together Property Management Limited has been registered with the ICO since 2016. We have a lot of experience in dealing with personal data and keeping it safe. We know what to do if there is a breach of data or if a request for data comes in. Our Registration Number is ZA206138. All registrations are automatically renewed annually.

Data Controller/Data Processor

Due to the wide variety of customers and clients we serve, in some instances we are the Data Controller and others we are the Data Processor.

Who does this policy apply to?

This policy applies to our customers and clients (including but not limited to Leaseholders, Tenants and Residents)

What do we collect and how do we use it?

Please see the Data Map at the bottom of this document.

Changing your details

You can view your personal details by logging into the Customer Portal and clicking on 'My Details'. The website is located here:

<https://portal.togetherproperty.co.uk/>

There is the functionality which allows us to send site updates via SMS to your mobile. Where we believe you would greatly benefit from receiving information quickly we may contact you via this method.

You can also change your personal details by sending an email to accounts@togetherproperty.co.uk. Please ensure that you include your Tenant Reference number which can be found on any previous correspondence from us or your address that you are contacting us about.



SUBJECT ACCESS REQUEST (SAR)

If you would like to request the data that we hold on you, please email dataprotection@togetherproperty.co.uk with a subject of 'Subject Access Request'.

Please include specifics of what data you'd like to receive.

Timeframe

The maximum time we will take on your request is 1 month from receiving the request unless we give a specific reason why it cannot be completed in this time.

Fees

If the request is manifestly unfounded, excessive or repetitive then there will be a fee. The fee will be quoted after an initial look at the request has taken place. Once accepted and we have received payment then we will action the request.

How information will be provided to you

We will ask how you would like the information to be provided whether that be electronically or in printed hard copy.

Large requests

Where the SAR request relates to data held over a large timeframe we may ask you to be more specific to assist us in searching for the information you are after. You may be asked to be more specific on the timeframe or come up with keywords to enable a more effective search.

Data Controller/Processor

Where we are the Data Controller we will process your request.

Where we are the Data Processor we will communicate with the Data Controller as they may wish to take ownership of the request.

What Personal Data we might hold on you, the legal reason for processing this data, how we collect the data and how long we will keep the data for.

What information we collect

Personal Information
(Name, Addresses, Phone Numbers, Email Addresses, Leases)

Incoming and outgoing email correspondence, incoming phone calls, incoming and outgoing physical correspondence

Bank details

Debit/Credit Card Details (please note these details are never recorded)

Solicitors details

Property and Building Information
Cases old and ongoing

What we use this for

Sending building related information, sending Payment Requests, sending Arrears letters, confirming identity.

Prove performance of a contract, staff praise, training and disciplinary action, business improvement, evaluation of our customers and clients

Set up a direct debit to pay for services or for the processing of refunds

To pay for services provided

Send important information and general correspondence related to ongoing customer requests

To be able to track issues and to be able to monitor ongoing repairs

Our reasons to process this

Legitimate Interest
Performance of a contract

Legitimate Interest
Performance of a contract

Consent

Consent

Consent
Legitimate Interest
Performance of a contract
Legal requirement

Legitimate Interest
Performance of a contract

DATA MAP



Type of Personal Data

Contact information

Financial

Property

Communications

Public domain data

Consent

Description

Where you live and how we can contact you

Account status and history

Information about the Property including issues, general information, old and open cases, Insurance claims, consent information and resale information

The information we learn from letters, phone calls and emails from yourself

Data which we can pick up from the internet using generic searches

Any requests such as paperless communications, direct debit requests

GROUPING

You give us data in a variety of ways:

- + When you talk to us on the phone or in person
- + In emails and physical letters
- + In Customer Surveys
- + Portal usage

Data from third parties:

- + Freeholders, RMC's, Developers, Investment Companies and other Property Management companies during site Hand Over
- + Local Councils
- + Other residents on your development
- + Public Domain Data such as land registry and companies house
- + Letting Agents
- + Government and law enforcement agencies

Sharing information

- + We may give out your personal data if required to do so for Police Investigation or Court Order.
- + We may give your personal data to a 3rd party as part of a sale of the business and assets to the 3rd party. However, steps will be taken to ensure that your privacy rights continue to be protected and the data is used in accordance our Privacy Notice.

- + In an emergency, we may be required to give your contact details out to a contractor to contact you. However, we will always try and contact you beforehand.
- + As part of our process for collecting site funds, where there has been no contact made by you to advise why there has been no payment or to setup a payment plan we may pass your details on to a Debt Collecting Agency. We would like to assure you that the agency we use has undergone checks to ensure they are GDPR compliant and will not share your details further.
- + When required to do so we enlist the expertise of external solicitors for legal advice. Your data may be passed on to them to give them a better understanding of certain legal situations.
- + There may be instances where we share data with the Freeholder, RMC and directors of a site. We will query the use of the data to ensure the reason is a 'legitimate interest' before giving this to them and ensure they have adequate protection in place to store your data.
- + If management of a site is transferred to another agent, we will give sufficient information we hold to the new management agents to ensure they can properly manage the site from the moment they take control.

DATA COLLECTION





Our Privacy Promise

- + We will not sell your data.
- + We will keep your data safe and private.
- + If we run any marketing campaigns in the future, this will be on an opt in basis to which you will be able to review and change.

We hope that you find this Privacy Notice useful a true and accurate representation of how we use your data. We welcome any feedback, please direct this to the DPO on the contact details which are listed in this document.

Data Protection Queries and Complaints

If you would like to raise a complaint in regards to the way we have handled your data or you have a concern please raise this with our DPO:

Post:

Data Protection Officer
Together Property Management Limited
PO Box 907
Altrincham
WA15 5PH

Email:

dataprotection@togetherproperty.co.uk

If we are unable to come back to you with a satisfactory response you can raise your concerns with the ICO at:

casework@ico.org.uk
0303 123 1113

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF



We're here to help

Whether you have a query on your account or are seeking information or guidance, please get in touch.

Our specialists are here to advise you on any aspect of managing and maintaining your property.

Together Property Management

Maintenance Office

PO Box 1319
Enfield, EN1 9ZJ
maintenance@togetherproperty.co.uk

Accounts Office

PO Box 907
Altrincham, WA15 5PH
accounts@togetherproperty.co.uk

020 8366 7070

www.togetherproperty.co.uk