

GDPR - DATA PRIVACY NOTICE

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2. Who are we?

We are Keppie Massie Residential Limited, Estate Agents (KMR). We are based at Bulloch House, 10 Rumford Place, Liverpool, L3 9DG. KMR is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes. KMR are Registered on the Information Commissioner's Office Data Protection Register under number ZA234220.

3. How do we process your personal data?

KMR complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To provide you with information about our services/Property requirements.
- To maintain our own accounts and records.
- To comply with Anti Money Laundering Regulations.
- Monitoring including: CCTV footage, vehicle details, swipe/fob records, PC login details, use of our IT and communications systems.
- Process job vacancy applications and CVs.
- Further business information necessarily processed in a project or client contractual relationship with Keppie Massie or voluntarily provided by you, such as instructions given, payments made, requests and projects.
- Contact details (including your name, address, date of birth, and email address).
- Photographic identification and proof of address documents (to carry out due diligence).
- Professional information (such as job title, previous positions, and professional experience).
- Banking and financial details (to establish the source of funds where a transaction is involved).
- Payment data, such as data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information.
- Contact details to effect essential repairs and maintenance on tenanted properties, and to be passed to authorised contractors as required.
- Any other information that you decide to voluntarily share with us (Feedback, opinions, reviews, comments, uploaded files, interests, information provided for due diligence process)
- Personal data about other named parties or those you authorise to transact or delegate third party authority to (e.g. spouse, business partner) You must have their authority to provide their personal data and share with them with this Privacy Notice beforehand.
- Information we may collect from other sources: such as agents, lawyers, accountants and other professional advisors who are acting on your behalf.
- We may also obtain information available on public registers to facilitate the work we do and perform due diligence; this may include information from credit reference agencies or fraud prevention agencies, electoral roll, court records of debt judgments and bankruptcy, land registry, Companies house and other publically available sources.
- To the extent applicable by law, we may also obtain information from other sources, such as public databases, joint marketing partners, social media platforms and other third parties. For example, depending on your social media settings, if you chose to connect your social media account to our account, certain data from your social media account will be shared with us, which may include data that is part of your profile.

4. What is the legal basis for processing your personal data?

We will only use personal information when the law allows us to under the following categories:

- **Consent:** where you have given clear consent to us to process your personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with us.
- **Legal obligation:** where we need to comply with a legal obligation.
- **Legitimate interests** - Processing is necessary for carrying out obligations under employment, property ownership and tenancy obligations and property services.
- To communicate health & safety information

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other departments of KMR in relation to providing you with a complete property service.

We may also disclose your information to the third parties listed below for the following purposes:

- third parties as necessary in the event of a claim or dispute relating to the use of our services;
- law enforcement bodies and/or other regulatory entities in order to comply with any legal obligation or court order;
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Other parties to a transaction, where necessary
- Debt collection and tracing agencies including bailiffs, where necessary

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. How long do we keep your personal data?

The personal information that you provide will be retained by us in accordance with applicable laws, industry guidance and our internal Retention Policy. However, we will take reasonable steps to destroy or de-identify personal information we hold if it is no longer needed for the purposes set out above. We will only hold your personal information on our systems for as long as is necessary for the relevant purposes for which it was collected.

Where you are a job applicant we will keep the information we receive about you throughout the recruitment process and for a period of six months after completion of the process. If you have not commenced employment with us we will then remove your information where we have not received any query or challenge which is outstanding. We will retain it if needed to deal with any outstanding query or challenge to the process. Where you become our employee we will keep your information where relevant to your employment and this will become part of your employment records.

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which KMR holds about you;
- The right to request that the KMR corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for KMR to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that KMR provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller,
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data,
- The right to lodge a complaint with the Information Commissioners Office.

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

9. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact Debra Beach, Manager at Bulloch House, 10 Rumford Place, Liverpool, L3 9DG. Email: dataprotection@keppiemassie.com

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.