

## **GDPR Fair Processing Notice**

### **How we use your personal information**

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

### **Who are we?**

Gladstones Property Investment Managers, 23 Jarnac Court, Dalkeith, EH22 1HU. We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act of 1998 and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25 May 2018, together with any domestic laws subsequently enacted.

We are notified as a data controller with the Information Commissioner's Office (ICO) under registration number Z9365154 and we are the data controller of any personal data that you provide to us.

Our data protection contact is John Blackwood, Director Gladstones Property Investment Managers, 23 Jarnac Court, Dalkeith, EH22 1HU, 0131 663 7266  
email: [info@gladstonesproperty.com](mailto:info@gladstonesproperty.com)

Any questions relating to this notice and our privacy practices should be sent to:

[info@gladstonesproperty.com](mailto:info@gladstonesproperty.com)

### **How we collect information from you and what information we collect**

We collect information about you as a **tenant**:

- when you apply for housing with us, become a tenant, request services/repairs, enter in to a tenancy agreement with ourselves howsoever arising or otherwise provide us with your personal details;

- from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information).

We collect the following information about you:

- Name;
- Address;
- Telephone number;
- email address;
- DOB
- National Insurance number;
- Next of kin
- Photographic ID
- Employment & Financial Information

We receive the following information from third parties:

- benefits information, including awards of Housing Benefit/Universal Credit
- payments made by you to us;
- complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland;
- reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour.

We collect information about you as a **Landlord**:

- when you sign up for our Property Letting services, become a client, request services, enter into an agreement with ourselves howsoever arising or otherwise provide us with your personal details;
- from your arrangements to make payment to us and us to you (such as bank details, payment card numbers).

We collect the following information about you:

- Name;
- Address;
- Telephone number;
- email address;
- Landlord registration number
- Proof of property ownership
- Photographic ID

We receive the following information from third parties:

- payments made by you to us;
- complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland;

**Why we need this information about you and how it will be used**

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request, housing application and complaints made;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our services or supplies which may affect you;
- for all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our products and services.

**Sharing of your information**

The information you provide to us will be treated by us as confidential and will be processed only by any third party, acting on our behalf, we may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- if we enter into a joint venture with or merge with another business entity, your information may be disclosed to our new business partners or owners;
- if we instruct repair or maintenance works, your information may be disclosed to any contractor;
- if we are investigating a complaint, information may be disclosed to Police Scotland, local authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- if we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and local authority);
- if we are investigating payments made or otherwise, your information may be disclosed to payment processors, local authority and the Department for Work & Pensions;
- if we are conducting a survey of our products and/or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- if we are asked by HMRC in regard to taxation, your information may be accordingly disclosed;
- if we are upgrading or undertaking repair or maintenance on our IT systems and property database

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

**Transfers outside the UK and Europe**

Your information will be stored within the UK and EEA. Where necessary we have ensured that the appropriate agreements and arrangements between the UK and the territories we are transferring the data to are in place, and that those territories have an agreement in place regarding their compliance with the General Data Protection Regulation.

## **Security**

When you give us information we take steps to make sure that your personal information is kept secure and safe.

### **Paper storage**

If personal data is stored on paper it should be kept in a secure place where unauthorised personnel cannot access it. Employees should make sure that no personal data is left where unauthorised personnel can access it. When the personal data is no longer required it must be disposed of by the employee so as to ensure its destruction. If the personal data requires to be retained on a physical file then the employee should ensure that it is properly secured within the file (e.g. stapled, or the documents are put on a Treasury Tag within the file) which is then stored in accordance with our storage provisions.

### **Electronic storage**

personal data stored electronically must also be protected from unauthorised use and access. Personal data should be password protected when being sent internally or externally to our data processors or those with whom we have entered in to a data sharing agreement. If personal data is stored on removable media (CD, DVD, USB memory stick) then that removable media must be stored securely at all times when not being used. Personal data should not be saved directly to mobile devices and should be stored on designated drives and servers.

## **How long we will keep your information**

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

Our full retention schedule is available from our office at: Gladstones, 23 Jarnac Court, Dalkeith, EH22 1HU or email request to: [info@gladstonesproperty.com](mailto:info@gladstonesproperty.com).

### **Your rights**

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data we hold about you; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at: [info@gladstonesproperty.com](mailto:info@gladstonesproperty.com)

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the Information Commissioner's Office (ICO) in relation to our use of your information. The ICO's contact details are noted below:

The Information Commissioner's Office – Scotland  
45 Melville Street, Edinburgh, EH3 7HL  
Telephone: 0131 244 9001  
email:[scotland@ico.org.uk](mailto:scotland@ico.org.uk)

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.