

Power of Attorney Privacy Notice

Neal Associates Ltd, is committed to protecting and processing your personal data in accordance with the General Data Protection Regulations and the Data Protection Act 2018 (the legislation). For the purpose of the legislation and your personal data, Neal Associates Ltd, is the Data Controller, Caroline Coles, is the person responsible for data protection and can be contacted at Ground Floor Offices, Hillcrest, St Mellion, Saltash. PL12 6RJ.

The General Data Protection Regulations are to safeguard your personally identifiable information or personal data. This privacy notice will be regularly reviewed and updated.

Information held

The personal data we process may include the information in column A of the attached appendix. Where the provision of data is a statutory, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data may mean that we are unable to provide you with our service.

To ensure that we provide you with the best service possible we will need to collect and retain certain personal data. The data may be collected and processed by those listed in columns B and F. How we source the data is identified in column C.

Lawful basis of processing

Your personal data will be used for the activities in column D. There are six lawful bases for processing your data including consent, a legitimate interest, contract fulfilment, a legal obligation and a vital interest. For each usage of the data the lawful basis of the processing of your data will be identified in column E. A legitimate interest is when we have a business or commercial reason to process your personal data which needs to be balanced with your interests i.e. what is right and best for you.

Where we state that we have a legitimate interest, the fact that we have a legitimate interest and what that legitimate interest is, will be stated in column E, e.g. to keep in touch with you when required, throughout the business relationship; to seek your consent when we need it to contact you; to fulfil our legal and contractual duties. Your personal data will be processed before, during and after a tenancy arranged on the property, and any subsequent tenancies.

Online identifiers, IP addresses and cookie identifiers

When you visit our website we may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns.

We may obtain information by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will

refuse cookies, our system will issue cookies when you log on to our site. You can find more information about cookies at www.allaboutcookies.org

This policy only applies to our site. If you leave our site via a link or otherwise, you will be subject to the privacy policy of that website provider. We have no control over that privacy policy or the terms of the website and you should check their privacy policy before continuing to access the site.

Recipients of personal data

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

Where is the data stored?

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period

We will retain some elements of your personal data for up to the time defined in column H after the tenancy. The information which can be anonymized will be that which is no longer required for either contractual fulfilment or a legitimate interest. If the lawful basis for processing your data was consent then you may withdraw such consent at any time.

Your rights

You have a right of access to check your personal data to verify the lawful basis of processing. We are obliged to respond to an access request within 30 days and may not charge a fee unless the request is unfounded, excessive or repetitive. If a fee is charged it is to be a reasonable fee based upon the administrative cost of providing the information.

You have a right to rectification if the data we hold is either inaccurate or incomplete. If your data has been disclosed to third parties then we must inform them of the rectification, where possible.

You have a right to require erasure of your data when consent is our basis of processing (the right to be forgotten). You may request that your personal data be erased, for example, where there is no compelling reason for its continued processing or where you withdraw consent. We will comply with your request unless we have another basis of processing justifying our retaining the data (for example a legal requirement or the defence of a legal claim).

You have some rights to ask us to restrict processing i.e. to block or suppress processing where, for example, the data may be incorrect and whilst the accuracy is verified. We are permitted to store the data.

Your right to object

You do have a right to object to further processing of your personal data. We may be required to stop processing unless there is some other legitimate basis of processing such as a legitimate interest or a requirement for the exercise or defence of a legal claim.

Withdrawal of consent

Where the lawful basis for processing is your consent, you may withdraw consent at any time by writing to, Caroline Coles, Neal Associates Ltd, at Ground Floor Offices, Hillcrest, St Mellion, Saltash. PL12 6RJ or emailing enquiries@nealassociates.co.uk.

How to lodge a complaint with the supervisory authority

The supervisory authority responsible for data protection is the Information Commissioners Office (ICO) to whom concerns may be reported by phone on **0303 123 1113** or +44 1625 545 745 if calling from outside the UK, by email using the form on the website ico.org.uk or the livechat function.

Data controller: Neal Associates Ltd		Data Subject: Power of Attorney				When will it be deleted?	
Information held	Who is collecting it?	How is it collected?	Why is it collected (what are we going to do with it?)	Lawful basis for processing	Who will it be shared with?	How is it stored?	When will it be deleted?
	Column A	Column B	Column C	Column D	Column E	Column F	
Attorney/Agent/Donor Name	Staff	Face to face in person, telephone, letter from Principal/Grantor/Donor	To add to database	Contract fulfillment/Compliance with the law	Staff, Book keeper, Landlords Legal representative, software provider, IT provider, back up, cloud	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after the death of the Landlord/Donor or after the contract has ceased.
			AML due diligence checks, verify Proof of Identity and Proof of Residency	Contract fulfillment/Compliance with the law	Staff, Software provider, IT provider, back up, cloud	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after the death of the Landlord/Donor or after the contract has ceased.
			To be able to contact the Attorney/Agent/Donor	Contract fulfillment/Compliance with the law	Staff, Book keeper, software provider, IT provider, back up, cloud	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after the death of the Landlord/Donor or after the contract has ceased.
			To give details to Tenant	Contract fulfillment/Compliance with the law	Staff, Book keeper, software provider, IT provider, back up, cloud	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after the death of the Landlord/Donor or after the contract has ceased.
			To use in Landlords Information Sheet (about each property to be let)	Contract fulfillment	Staff, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after cancellation of contract between Landlord and Agent
			Advise on Rent Guarantee and Legal Expenses provided by us	Contract fulfillment	Staff, policy provider, legal team in event of a claim, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after cancellation of contract between Landlord and Agent
			To produce Financial Statements and Invoices for rent received	Contract fulfillment/Complying with law	Staff/Book keeper, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after end of Tenancy or 6 years after cancellation of contract between Landlord and Agent
			If legal action is needed	Contract fulfillment/Compliance with the law	Staff, Tenant, Solicitor, Court Services, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after cancellation of contract between Landlord and Agent
			If we are required to instruct a third party Company (Landlord Advice UK) to serve any legal notices on Landlords behalf	Contract fulfillment/Compliance with the law	Staff/Landlord Advice UK or such other party as instructed by the Landlord/back up/cloud/software provider/IT	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after cancellation of the contract between Landlord and Agent
Attorney/Agent/Donor contact details to include address, telephone number and email address	Staff	Face to face, in the office, telephone, email, letter	To add to database	Contract fulfillment/Compliance with the law	Staff, Book keeper, Landlords Legal representative, software provider, IT provider, back up, cloud	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after the death of the Landlord/Donor or after the contract has ceased.
			AML due diligence checks, verify Proof of Identity and Proof of Residency	Contract fulfillment/Compliance with the law	Staff, Software provider, IT provider, back up, cloud	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after the death of the Landlord/Donor or after the contract has ceased.

				To be able to contact the Attorney/Agent/Donee	Contract fulfillment/Compliance with the law	Staff, Book keeper, software provider, IT provider, back up, cloud	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after the death of the Landlord/Donor or after the contract has ceased.
				To give details to Tenant	Contract fulfillment/Compliance with the law	Staff, Book keeper, software provider, IT provider, back up, cloud	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after the death of the Landlord/Donor or after the contract has ceased.
				To use in Landlords Information Sheet (about each property to be let)	Contract fulfillment	Staff, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after cancellation of contract between Landlord and Agent
				Advise on Rent Guarantee and Legal Expenses provided by us	Contract fulfillment	Staff, policy provider, legal team in event of a claim, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after cancellation of contract between Landlord and Agent
				To produce Financial Statements and Invoices for rent received	Contract fulfillment/Compliance with the law	Staff/Book keeper, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after end of Tenancy or 6 years after cancellation of contract between Landlord and Agent
				If legal action is needed	Contract fulfillment/Compliance with the law	Staff, Tenant, Solicitor, Court Services, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after end of Tenancy or 6 years after cancellation of contract between Landlord and Agent
				If we are required to instruct a third party Company (Landlord Advice UK) to serve any legal notices on Landlords behalf	Contract fulfillment/Compliance with the law	Staff/Landlord Advice UK or such other party as instructed by the Landlord/back up/cloud/software provider/IT provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after cancellation of the contract between Landlord and Agent
Landlord Bank Details	Staff	Landlord Information Sheet		To process payment	Contract fulfillment/Compliance with the law	Staff, Book keeper, Bank platform/ back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	Immediately contract between Landlord and Agent ceases
Certificate of Exemption	Staff	HM Revenues & Customs		To process payment of rent	Contract fulfillment/Compliance with the law	Staff/HMRC/back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after cancellation of contract between Landlord and Agent
Landlord's Accountants name	Staff	Over the phone/email/letter		To supply details of income/expenditure for Landlords Tax Return	Contract fulfillment/Compliance with the law	Staff, Book keeper, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after the Tax year in question
Landlord's Accountants contact details	Staff	Over the phone/email/letter		To supply details of income/expenditure for Landlords Tax Return	Contract fulfillment/Compliance with the law	Staff, Book keeper, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after the Tax year in question
Landlord's Solicitors name	Staff	Over the phone/email/letter		To supply details relevant to a sale of a Landlord's property OR to serve Notice on Tenant	Contract fulfillment/Compliance with the law	Staff, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after property sold or 6 years after cancellation of contract between Landlord and Agent
Landlord's Solicitors contact details	Staff	Over the phone/email/letter		To supply details relevant to a sale of a Landlord's property OR to serve Notice on Tenant	Contract fulfillment/Compliance with the law	Staff, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after property sold or 6 years after cancellation of contract between Landlord and Agent

Court stamped Power of Attorney	Staff	In person/ letter/ email	To enable us to fulfill Landlords obligations under Terms of Business and Tenancy Agreement	Contract fulfillment/Compliance with the law	Staff, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software provider/back up/cloud	6 years after cancellation of contract between Landlord and Agent
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