

Tenant 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 and may also include other sensitive data concerning health, if relevant to your tenancy. 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. We may source data from third parties or via third parties e.g. Credit referencing company, referees.

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 during and after the tenancy; to seek your consent when we need it to contact you; fulfilling our legal and contractual duties. Your personal data will be processed during and after your tenancy and any subsequent tenancy arranged through us.

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 your 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							
Information held	Data Subject: Tenant						
	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	Column G	Column H
Tenant Name	Staff	In office, over the phone, email, self registration, tenant application form, credit check provider form	To use on contract	Contractual fulfillment/Compliance with the law	Landlord, staff, book keeper, local authority & utilities, contractors, backup/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/backup	6 years after tenancy ends or immediately if the tenancy does not proceed
			To give to or discuss with prospective Landlord	Contractual fulfillment	Landlord, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software system/cloud/backup	6 years after tenancy ends or immediately if the tenancy does not proceed
			Add to property management software and PayProp platform	Contractual fulfillment/Compliance with the law	Staff, book keeper, Contractors, backup/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/backup	During tenancy & 6 years beyond or immediately if the tenancy does not proceed
			Referencing	Contractual fulfillment	Staff, Credit check Co, Employer, Accountant, current Landlord, previous Landlord, character referee, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/backup	During tenancy. Credit check only 6 years after tenancy ends or immediately if the tenancy does not proceed
			AML due diligence check, verify Proof of Identity	Contractual fulfillment/Compliance with the law	Staff, HMRC, back up, cloud, software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/backup	6 years after tenancy ends or immediately if the tenancy does not proceed
			To be able to contact tenant e.g. Property management	Contractual fulfillment/Compliance with the law	Contractors, staff, book keeper, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/backup	6 years after tenancy ends or immediately if the tenancy does not proceed
			To use on prescribed information	Contractual fulfillment/Compliance with the law	Staff, Deposit scheme, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/backup	6 years after tenancy ends or immediately if the tenancy does not proceed
			To communicate with Local Authority, eg: if there are arrears of rent and you are in receipt of housing benefit	Contract fulfillment	Staff, Local Authority, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/backup	6 years after tenancy ends or immediately if the tenancy does not proceed
			If legal action is needed then to give to legal advisors	Contractual fulfillment/Compliance with the law	Landlord, Solicitor, Court Services, back up/cloud/software provider	Paper, filing cabinet/electronic/software system/cloud/backup	6 years after tenancy ends or immediately if the tenancy does not proceed
			Services/utilities	Contract fulfillment	Council Tax & Utility providers, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/backup	6 years after tenancy ends or immediately if the tenancy does not proceed

				To create a Tenancy Agreement	Contractual fulfillment/Compliance with the law	Staff, Landlord, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends or immediately if the tenancy does not proceed
Tenant contact details to include address, telephone number and email address	In office, over the phone, email, self registration, tenant application form, Credit Check provider form			To use on contract	Contractual fulfillment/Compliance with the law	Landlord, staff, local authority & utilities; contractors; backup/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends or immediately if the tenancy does not proceed
				To give to or discuss with prospective Landlord	Contractual fulfillment	Landlord, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends or immediately if the tenancy does not proceed
				Add to property management software and PayProp platform	Contractual fulfillment/Compliance with the law	Staff, book keeper, Contractors, backup/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends or immediately if the tenancy does not proceed
				Referencing	Contractual fulfillment	Staff, Credit check Co, Employer, Accountant, current Landlord, previous Landlord, character referee, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/back up	During tenancy. Credit check only 6 years after tenant leaves or immediately if the tenancy does not proceed
				AML due diligence check, verify Proof of Identity	Contractual fulfillment/Compliance with the law	Staff, HMRC, back up, cloud, software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends or immediately if the tenancy does not proceed
				To be able to contact tenant e.g. Property management	Contractual fulfillment/Compliance with the law	Contractors, staff, book keeper, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/back up	During the tenancy
				To use on prescribed information	Contractual fulfillment/Compliance with the law	Staff, Deposit scheme, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/back up	During the tenancy and 6 years after the tenancy ends
				If legal action is needed then to give to legal advisors	Contractual fulfillment/Compliance with the law	Landlord, Solicitor, Court Services, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends
				To put on completion form with Tenant info Pack handed over on day of completion	Contract fulfillment	Staff, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends
				Referencing verifying age of applicant	Contractual fulfillment/Compliance with the law	Staff, credit check provider, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends
Date of Birth	Tenant Application form / Credit Check form			AML due diligence check, verify Proof of Identity	Contractual fulfillment/Compliance with the law	Staff, HMRC, back up, cloud, software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends or immediately if the tenancy does not proceed

Tenant's Employer	Staff	Tenant Application form	Referencing & affordability assessment	Contractual fulfillment	Staff, Landlord, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends
Tenant previous Landlord	Staff	Tenant Application form	Referencing & assessment	Contractual fulfillment	Staff, Landlord, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends
Tenant's last 3 years addresses	Staff	Tenant Application form	Referencing & assessment	Contractual fulfillment	Staff, Credit Check provider, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends
Tenant Next of Kin	Staff	Tenant Application form	Contact in case of emergency	Legitimate interest eg in the event of serious illness or death of the Tenant	Staff, Public bodies, back up/cloud/software provider, IT provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends
Tenant Bank details	Staff	Credit check provider application form	Credit check	Contractual fulfillment	Staff, Credit check Co, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends
Permitted Occupiers	Staff	Tenant Application form	To identify permitted users to be included in Tenancy Agreement	Contractual fulfillment	Staff, Landlord, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends
Credit Score Results	Credit Check Co	Email & online	To assess suitability and affordability	Contractual fulfillment	Staff, Landlord, credit check provider, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends
Other returned references	Staff	Email, online, hard copy	To assess suitability	Contractual fulfillment	Staff, Landlord, back up/cloud/software provider, IT Provider	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends
Tenant Passport or other form of ID	Staff	Make a certified copy of original	To comply with Right to Rent checks	Contractual fulfillment/Compliance with the law	Contractual fulfillment/Compliance with the law	Paper, filing cabinet/electronic/software system/cloud/back up	6 years after tenancy ends