

PRIVACY POLICY

Data Controller	Tony Hornby Property Management Services
Data Processors	<ul style="list-style-type: none">• Mrs Laura Warrener• Ms Sandra Hornby• Mr David Hornby• Mr Liam Hornby• Ms Emma Wells-Hall

Tony Hornby Property Management Services 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, Tony Hornby Property Management Services is the Data Controller, Mrs Laura Warrener Ms Sandra Bond, Mr David Hornby, Mr Liam Hornby and Ms Emma Wells-Hall are the persons responsible for data protection and can be contacted at 19 Hoghton Street, Southport, Merseyside, PR9 0NS (Tel: 01704 500388) (email: office@hornbylettings.co.uk) .

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, where relevant, concerning health. 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 or a tenancy application cannot proceed.

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:-

- 1. Contractual fulfilment: EG** A landlord/agent provides their tenants' contact details to a contractor in order to effect a repair/replacement. This would be contractual fulfilment, the landlord/agent is fulfilling their contractual obligations to repair the property.
- 2. Legitimate interest: EG** Tenant Referencing - A landlord/agent would have a legitimate interest in referencing a prospective tenant to establish financial suitability to afford the rent.
- 3. Consent: EG** – Consent may be required if none of the other bases of processing apply.
- 4. Compliance with the law: EG** the landlord/agent provides the tenant's information to the deposit protection scheme in order to comply with the Housing Act 2004.
- 5. Protecting vital interests: EG** this is literally life or death and must be in the vital interest of the data subject as opposed to the business (EG providing information to the emergency services if tenant/landlord became unwell on business premises).

- 6. Public interest or official function: EG** the landlord/agent discovers the tenants are supplying illegal drugs from the property; this is not in the public interest therefore the landlord/agent informs the police supplying them with personal data relating to the tenant.

For each usage of the data the lawful basis of the processing of your data will be identified in column E.

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 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 application process. The information that 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, Mr David Hornby, Tony Hornby Property Management Services, 19 Houghton Street, Southport, Merseyside, PR9 0NS or by emailing office@hornbylettings.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.

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	Column G	Column H
Name and address	Tony Hornby Property Management Services - Data Controllers	Telephone, email, tenancy/guarantor/company application forms, landlord valuation sheet and Agency Agreement and Terms and Conditions, HMLR checks	To facilitate referencing & Right to Rent, Tenancy Agreement and relevant documentation, deposit documentation, HMLR checks, utility companies, property insurers, contractor instructions	Consent, Legitimate Interest, contract fulfilment, legal obligation	Landlords, contractors, deposit scheme, Local Authority and utility companies, HMLR, HMRC and relevant government bodies in the course of Right to Rent, money laundering checks or other	Cloud based ALTO software Paper	Information will be deleted within 3 months should an application not be successful or 6 years after the termination of an Agreement/expiration of tenancy.
Contact telephone numbers and email address	Tony Hornby Property Management Services - Data Controllers	Telephone, email, tenancy/guarantor/company application forms, landlord valuation sheet and Agency Agreement and Terms and Conditions	To facilitate referencing, Tenancy Agreement and relevant documentation, deposit documentation, contractor instructions	Consent, Legitimate Interest, contract fulfilment, legal obligation	Landlords, contractors, deposit scheme, HMRC and relevant government bodies in the course of Right to Rent, money laundering checks or other	Cloud based ALTO software Paper	Information will be deleted within 3 months should an application not be successful or 6 years after the termination of an Agreement/expiration of tenancy.
Identification, Country and date of birth	Tony Hornby Property Management Services - Data Controllers	Photocopying originals in office, email, tenancy/guarantor/company application forms, landlord Agency Agreement and Terms and Conditions	To facilitate referencing & Right To Rent, Tenancy Agreement and relevant documentation, deposit documentation, HMLR checks, utility companies, property insurers	Consent, Legitimate Interest, contract fulfilment, legal obligation	Local Authority/utility companies, HMRC and relevant government bodies in the course of Right to Rent, money laundering checks or other	Cloud based ALTO software Paper	Information will be deleted within 3 months should an application not be successful or 6 years after the termination of an Agreement/expiration of tenancy.

Bank details	Tony Hornby Property Management Services - Data Controllers	Telephone, email, tenancy/guarantor/company application forms, landlord Agency Agreement and Terms and Conditions	To facilitate referencing, money laundering checks, landlord remittance, contractor payments	Consent, Legitimate Interest, contract fulfilment	Not disclosed to any third party	Cloud based ALTO software Paper	Information will be deleted within 3 months should an application not be successful or 6 years after the termination of an Agreement/expiration of tenancy.
Health (if applicable)	Tony Hornby Property Management Services - Data Controllers	Telephone, email, tenancy/guarantor/company application forms	To establish any mental or health needs or requirements to determine property suitability/adaptation, any additional support required	Consent, Legitimate Interest, contract fulfilment, vital interest	This information will not be disclosed to any third party (EG Contractor/Local Authority/Emergency Services) without your consent, save for in a medical emergency	Cloud based ALTO software Paper	Information will be deleted within 3 months should an application not be successful or 6 years after the termination of an Agreement/expiration of tenancy.
Relevant Person/Referee/ Next of Kin/ Guarantor	Tony Hornby Property Management Services - Data Controllers	Telephone, email, tenancy/guarantor/company application forms, deposit protection information request form	To facilitate referencing, Tenancy Agreement and relevant documentation, deposit documentation, HMLR checks, money laundering checks	Consent, Legitimate Interest, contract fulfilment, legal obligation	Landlord Applicant tenant/guarantors' existing employer and landlord (if applicable) for referencing purposes	Cloud based ALTO software Paper	Information will be deleted within 3 months should an application not be successful or 6 years after the termination of an Agreement/expiration of tenancy.
Self/employment & previous landlord information	Tony Hornby Property Management Services - Data Controllers	Telephone, email, tenancy/guarantor/company application forms	To facilitate tenant/Guarantor referencing	Consent, Legitimate Interest, contract fulfilment	Landlord Applicant tenant/guarantors' existing employer and landlord (if applicable) for referencing purposes	Cloud based ALTO software Paper	Information will be deleted within 3 months should an application not be successful or 6 years after the termination of an Agreement/expiration of tenancy.