

Last Updated March 2019

## **GA Property Services Privacy Policy**

This is the privacy policy for GA Property Services. It sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed. It is important that you read this policy in full to understand what information we hold about you, how we may use it and what rights you have in relation to your data.

We may need to update this policy to reflect those changes, as well as any changes to our business from time to time.

### **1. Who we are**

We are GA Property Services, a limited company incorporated in England and Wales with Company No. 08397151. Our registered address is

GA Property Services  
Unit7 The Space Place  
Alphinbrook Rd  
Marsh Barton,  
Exeter EX2 8RG

In this policy we refer to ourselves as “we”, “us”, “our” and “GA Property Services”.

GA Property Services is a “data controller” and a “data processor”. This means that we are responsible for deciding how we hold and use personal information we have collected from you and we also receive from third parties in order to fulfil our contract with them to undertake services on their behalf.

If you have any questions, or want more details about how we use your personal information, you can contact our Data Protection Officer as follows:

Angie Stevenson  
GA Property Services  
Unit7 The Space Place  
Alphinbrook Rd  
Marsh Barton,  
Exeter EX2 8RG  
angie@gapropertyservices.net

### **2. Introduction**

This Privacy Notice is to let you know how we handle your personal data. This Privacy Notice explains our approach, your privacy rights and how the law protects you. Your personal data is any information relating to you from which you can be identified.

This notice sets out:

- how we will process any personal data that we collect from you and what it will be used for;
- your rights under the General Data Protection Regulation (GDPR) in connection with the way we handle your personal data.

This Privacy Notice applies to any personal data which you may provide to us in person, over the telephone, by email, on our website and/or by post. This Privacy Notice also applies to any personal data which we may collect from third parties about you and/or which we may collect when you access our website and/or in the course of our relationship.

### **3. Our Commitment**

We commit to:

- keeping your personal data safe and only processing it on a valid legal basis;
- keeping our records up-to-date and deleting or correcting inaccurate personal data;
- deleting your personal data after it is no longer needed for the purpose we collected it;
- not selling your personal data.

### **4. Legal basis for processing your data**

We need to have a proper reason whenever we process your personal data ourselves or share it with third parties. This means that we can only process your personal data if we meet one (or more) of these criteria:

- (a) Your consent; or
- (b) We have a contractual obligation; or
- (c) We have a legal obligation; or
- (d) We have a vital interest; or
- (e) We need it to perform a public task; or
- (f) We have a legitimate interest; or

A legitimate interest is when we have a business or commercial reason to process your personal data, but this must not unfairly go against your rights.

### **5. Information we collect, how we process it and under which legal basis**

We may collect personal data from you or a third party in the following ways:

- when you make an enquiry via our website;
- when you contact us in person, over the telephone, by email, by post or social media;
- when you apply for our products and services;
- payment and transaction data;
- companies that introduce you to us;
- suppliers of materials and equipment;
- trade contractors.

The type of information we may ask you to provide about yourself or receive from a third party includes but is not limited to:

- contact details such as your name, address, contact telephone number (mobile and landline) and email address;
- the nature of your enquiry;
- contractual details about the products or services we provide to you directly or on behalf of a third party;
- locational data about where you are
- communications: letters, emails and conversations between us or the third party we are acting on behalf of.

As well as personal information (such as your name, address, telephone number) we may collect sensitive personal information (also known as special categories of data), about your health, such as any disabilities. We use this data to ensure that our products and services are products are suitable for your needs and are delivered appropriately. If this information is processed on behalf of a third party – we will be acting as the data processor not the controller and refer you to the data controller’s privacy policy.

We will not process or collect any other special categories of personal data revealing any of the following information about you: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, sexual orientation.

<b>Purpose</b>	<b>Lawful basis</b>
To carry out our legal and contractual obligations arising from any contract or agreement between us or on behalf of a third party.	To fulfil a contract. To comply with legal obligations.
To provide you with information about our products and services.	Our legitimate interests to provide you with information about our products and services that we think you may want or need, or that may be of interest to you.
To process a complaint received from you.	Our legitimate interests to manage our relationship with you. We may also need to fulfil our legal and contractual duties.
To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit.	Our legitimate interests. Our legal duty. Complying with regulations that apply to us. Being efficient about how we fulfil our legal and contractual duties. To obey laws and regulations that apply to us.

## **6. Protecting your information**

We will seek to keep your personal data secure by taking appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Only authorised personnel will have access to your personal data. We use password protection for all digital files and have suitable firewall technologies in place. All paper-based records are stored in our secure, registered offices.

Sometimes we need to share personal information we hold about you with other organisations that we work with or who provide services on our behalf. When sharing information, we will comply with all aspects of data protection law.

Your personal information is not sent or stored outside of the EU and is therefore fully protected and meets all regulations under GDPR policy.

### **Data retention period**

We will retain your personal data for no longer than the period of time needed for the purposes that we collected the data and for as long as we have legal grounds to retain it. There is no fixed period after which all record of your personal data will be deleted as this will depend on the circumstances and the purposes of the processing but we will take steps and maintain policies to keep retention under proper review.

This information will be held, in line with recommended guidelines, for the duration of the contract/relationship. Thereafter any and all information will be destroyed and deleted. We will not seek your consent before deleting any personal data.

GA Property Services does not employ any automated decision making/logic systems in the processing or analysis of this data.

## **7. Changes to this privacy notice**

Any changes we may make to this Privacy Notice in the future will be posted on this website and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this Privacy Notice.

## **8. Your rights**

GA Property Services is committed to upholding your data privacy rights.

### **The right to be informed**

We will be open and transparent about how and why we use your personal information. This will be set out in our privacy notices.

### **The right of access**

You have a right to ask us what personal information we hold about you and to request a copy of your personal information. This is known as a 'subject access request' (SAR).

SARs need to be made in writing and accompanied by proof of your address and identify. If someone is requesting information on your behalf they will need to provide us with your written consent for us to release your information and proof of ID (both yours and theirs).

We will provide you with a copy of the personal information that we hold about you. This will not generally include information about your property such as repair logs or details of contractor visits

as this is unlikely to constitute your 'personal information'. Please be clear if you are seeking property or repairs related information as a SAR is unlikely to fulfil your information requirements.

### **The right to rectification**

You can ask us to rectify your personal data if it is inaccurate or incomplete by contacting us using the contact details above. If you do, we will take reasonable steps to check its accuracy and correct it.

Please help us to keep our records accurate by keeping us informed of any changes in your personal information.

### **The right to erasure**

The right to erasure is also known as 'the right to be forgotten'. In some circumstances, you can ask us to delete or remove personal data where there is no compelling reason for its continued processing. This is not an absolute right, and we will need to consider the circumstances of any such request and balance this against our need to continue processing the data, for example, to comply with a legal obligation. Our response will also be guided by the provisions of our retention schedule.

### **The right to restrict processing**

In some circumstances you can ask us to restrict the use of your personal information. This is not an absolute right and only applies if:

- You disagree with the accuracy of your personal information
- It has been used unlawfully but you don't want us to delete it
- It's not relevant any more, but you want us to keep it for use in legal claims
- You have already asked us to stop using your data but you are waiting for us to tell you if we can keep on using it
- If we're processing your data on the grounds of legitimate interests (as detailed earlier), and whilst we consider whether our legitimate grounds override those of yours.

If we restrict the processing of your personal information, we are permitted to store the personal data but we won't use it.

### **The right to data portability**

Data portability allows you to obtain and reuse your personal data for your own purposes across different services. You can ask us to move, copy or transfer your personal data from one IT environment to another by contacting us on the contact details above.

The right to data portability is not an absolute right and only applies:

- to personal information you have provided to us
- where our processing is based on your consent or for the performance of a contract
- when our processing is carried out by automated means.

### **The right to object**

You can object to our processing of your personal data where that processing is:

- Based on legitimate interests

We will stop processing your personal data unless:

- we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or
- the processing is for the establishment, exercise or defence of legal claims.

We will comply with any request free of charge. However, we can charge a 'reasonable fee' if your request is manifestly unfounded or excessive, particularly if it is repetitive. Our fee will be based on administrative cost incurred by us in complying with your request.

Where your request is manifestly unfounded or excessive we can refuse to comply with your request. If we refuse to comply with your request, we will let you know why.

We have one month to comply with your request (although we will try to do this as promptly as possible). We may extend this period by a further two months if your request is complex or we have received a number of requests from you. If this is the case, we will inform you within one month of the receipt of your written request, explaining why an extension is necessary.

### **How to complain**

If you are unhappy with why or how we have used your personal information, please contact us on the address above.

The Information Commissioner's Office (ICO) is the body that regulates Data Protection and Freedom of Information legislation. If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the ICO at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate)

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

[www.ico.org.uk](http://www.ico.org.uk)