

## Data Protection Privacy Notice – Other Parties

At Roger Hannah Ltd we're committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

Our Clients will receive specific notices within our standard terms and conditions.

Tenants of our Managed Property clients will receive specific notices.

Those applying for or enquiring into employment opportunities will receive specific notice.

This notice seeks to inform other parties about personal information we may hold or process. In many of these circumstances we act as Data Processor for our client, the Data Controller. However we would like to inform you about the data we process.

We may change this Policy from time to time so please check this web page occasionally to ensure that you're happy with any changes.

Any questions regarding this Policy and our privacy practices should be sent by email to [property@roger-hannah.co.uk](mailto:property@roger-hannah.co.uk) or by writing to Roger Hannah Ltd, Century Buildings, 14 St Marys Parsonage, Manchester. M3 2DF. Alternatively, you can telephone 0161 817 3399.

### Who are we?

We are Roger Hannah Ltd, one of the leading Chartered Surveyors and Property Managers in the North West.

The registered address is St Georges House, 215-219 Chester Rd, Manchester. M15 4JE.

We are registered under, and handle personal data in accordance with, the Data Protection Act 1998 and other relevant privacy legislation. Roger Hannah Ltd is registered on the Information Commissioner's Office Data Protection Register under number Z245116X.

### What type of information is collected from you?

You are not required to provide any personally identifiable information on the public areas of this website. However, you may choose to provide data by completing forms or contact requests on various sections of our website or by otherwise requesting information from us or subscribing for our services.

We usually collect information that you willingly provide us with in order to perform services to yourself or to procure services from you. We may also collect information as a result of our work with our clients.

### The personal information we collect might include:

- Personal identification data (Name, surname, title, date of birth)
- Contact information data (Email, phone number, address, country)

- Images and/or videos from which you may be identified (e.g. CCTV images from our clients managed properties)
- Financial and earnings data (Bank account and profits / remuneration data but not credit card data)
- Medical details where that is relevant to a claim/case/matter
- Details of your education and employment history
- Special Categories of personal data in rare circumstances (including race, religion, political interests) only where relevant to our engagement and this will be kept securely away from other data
- Data required for Money Laundering Checks and other ID checks
- Any other information that you decide to voluntarily share us (Feedback, opinions, reviews, comments, uploaded files, interests, information provided for our due diligence process)
- Personal data about other named parties to our engagement (e.g. your spouse or business partners). You must have their authority to provide their personal data and share this Privacy Notice with them beforehand.

### Information we may collect from other sources

We may obtain information from agents, lawyers, accountants and other professional advisors who are acting on your behalf whether you are our client or where you are the other party involved in our client's affairs.

We may also obtain information available on public registers to facilitate the work we are doing for our clients or perform due diligence on prospective engagements, this may include information from credit reference or fraud prevention agencies, electoral roll, court records of debt judgements and bankruptcies, land registry, Companies House and other publically available sources.

To the extent permitted by applicable law, we may also obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms and other third parties. For example, depending on your social media settings, if you choose to connect your social media account to our account, certain data from your social media account will be shared with us, which may include data that is part of your profile.

### On what legal basis do we use your data?

We use your data to establish or potentially establish a **contractual relationship** with you or to perform our obligations under a contract. This includes services we provide to you, goods and services you may supply to us or in order to manage lease contracts on behalf of our clients.

Where we act for a client we may hold limited data on the other party to a transaction or dispute in order to **fulfil that contract** and for the **legitimate interests of our client** as required for that transaction or dispute process. In these circumstances we act as Data Processor and the client is Data Controller.

For example this would include data on:

- landlord when acting for the tenant or the tenant when acting for the landlord

- borrowers when undertaking valuations for lending purposes
- previous property owners or their managing agents when taking on the management of a property
- subsequent property owners or their managing agent when ceasing to manage a property
- the other party to a dispute where we are acting as expert witness
- third parties involved in our clients engagement (e.g. land and property owners and tenants) where we conduct strategic development planning or research for compulsory purchase or development purposes but this would only be data available publically (e.g. Companies House, Land Registry or Electoral Roll).

We use data for our **legitimate interests** and the legitimate interests of the data subject where we process data:

- on agents, buyers and potential buyers, sellers and potential sellers and viewers who may be interested in properties for rent or sale
- those we believe may be interested in the services or activities of the Company

Sometimes we also hold personal information for **legal and regulatory reasons** for instance:

- to comply with tax regulations
- for legal and regulatory requirements and related disclosures
- for the establishment and defence of legal right
- activities relating to the prevention and detection of fraud or crime
- to verify your identity, make credit, fraud prevention and anti-money laundering checks

We process data on employees and potential employees who have expressed an interest in the Company either directly or through a recruitment agent or other referral. This is on the **legitimate interests** of ourselves and the data subject and potentially in order to enter a **contract of employment**.

### How is your information used?

We may use your information to:

- manage and maintain our relationship with you either as your client or recipient of your goods or services including to carry out our obligations arising from any contracts or engagements entered into with you
- conduct identity, credit, regulatory, and conflict checks
- organise services from suppliers and service providers
- act for our clients in cases which may involve you, for example as a claimant or defendant, land or property owner, buyer, seller, landlord or tenant
- comply with legal obligations and to establish, exercise, or defend ourselves from legal claims
- organise and promote events, including the creating of attendee lists and name badges
- any other legal basis anyhow permitted by local law
- manage the take on or handover of managed property
- seek approval from a tenant to receive rent from you as their alias
- communicate payroll data about you to service providers if you are our client's staff
- handle enquiries about properties including booking viewings and contacting you about suitable properties you may be interested in

- provide our Clients with research on occupation in residential and commercial properties
- provide services or information requested by you
- send you communications which you have requested or that may be of interest to you including information about our products and services
- seek your views or comments on the services we provide
- pursue our legitimate interests

### How long do we hold information on you?

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations.

We will hold your personal information on our systems:

- for as long as is necessary for the relevant activity
- as long as is set out in any relevant contract you hold with us or our instructing Data Controller has set
- as required for legal or insurance purposes
- as is practical or necessary within the IT system we use

Generally we will hold data for 7 years from the end of our engagement with our client or the end of a lease. There are situations where we hold data for longer including:

- Construction Projects where a formal contract is signed as a deed – data is held for 12 years from Practical Completion of the scheme
- Valuation files where a re-valuation is performed.
- Investment and property purchase history also available in public records and databanks.
- Document under seal which must be 12 years (e.g. some leases or deeds or contracts)

### Who has access to your information?

Your personal information will not be disclosed to third parties unless either you agree or we are required to do so to comply with our contractual, legal or regulatory requirements or are instructed by our client where they are data Controller.

For instance, where necessary or required we share information with:

- suppliers of goods or services
- financial organisations and credit reference agencies
- debt collection and tracing agencies including bailiffs
- local and central government
- tax authorities
- police forces
- regulatory authorities
- security organisations
- legal and other advisors
- other companies in the same group
- landlords and tenants
- accountants
- other parties to a transaction
- former owners and managing agents of a property you engage us to manage and subsequent owners and managing agents you instruct us to hand over to
- insurance brokers
- mortgage providers
- business associates

- tenants of and suppliers to managed properties, including on cloud based databases

We may share publically available data with our Clients for research purposes.

We may pass your information to third party service providers, advisors, agents, subcontractors and other associated organisations for the purposes of fulfilling obligations to our Client. When we use third party service providers, we disclose only the personal information that is necessary to deliver the service.

If you are selling or renting a property your personal name may be disclosed in legal packs which are available via our partner web site until the property is sold or delisted.

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Our website may contain links to other sites whose information practices may be different than ours. Visitors should consult the other sites' privacy policies as we have no control over information that is submitted to, or collected by, these third parties.

We may post information about programmes and events that are sponsored or co-sponsored by other organisations. Should you choose to register for any of these events, we will have no control over the third party sponsor's use of your information.

#### **What we would also like to do with your data**

We would like to use your name and email address to inform you of our future offers and similar products. This information is not shared with third purposes and you can unsubscribe at any time via phone, email or our website.

In accordance with marketing regulations we need you to opt in to this. Please click the link below to sign up to our newsletters.

<https://www.roger-hannah.co.uk/about/follow-us/>

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely.

Non-sensitive details are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

We select appropriate services providers who apply high standards of security when it comes to web hosting and IT networks.

We have policies and technical measures in place to protect your Personal Data against unauthorised access, accidental loss, improper use and disclosure. All of our employees and any third parties we engage to process your personal information are obliged to respect the confidentiality of your information and comply with IT and Data Protection Policies.

We do not sell, rent, distribute or otherwise make personal information commercially available to any third party, except as described in this policy or with your prior permission.  
Use of 'cookies'

Our website does not use cookies.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access those using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

#### **Do we collect data from children?**

We do not intentionally collect information from children under the age of 16.

If you are under the age of 16, we advise that you speak with and get your parent or guardian's consent before sharing your data with us.

Parents of Children under the age of 16: we recommend you to check and monitor your children's use of our products, systems, services, applications (including websites and other digital channels) and Social Media usage in order to make sure that your child does not share personal data with us without asking your permission.

#### **Transferring your information outside of Europe**

All the personal data we process is processed by our staff in the UK however for the purposes of data storage and hosting this information may be located on servers within the European Union.

Any information that you provide to us may entail a transfer of your information to outside the EEA where the level of protection may not be as comprehensive as it is within the EEA. We will ensure that procedures are put in place to ensure that your Personal Data is adequately protected.

If you use our services while you are outside the EU, your information may be transferred outside the EU as a result of the means by which you access information (e.g. receiving email when abroad on your portable device).

#### **How you can access and update your information**

The accuracy of your information is important to us. We will proactively confirm details when we are in contact with you. If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: [property@roger-hannah.co.uk](mailto:property@roger-hannah.co.uk).

#### **What are your rights?**

You have a right of access to Personal Data that we may hold about you, to have inaccurate information about you corrected and to request that we stop using your Personal Data for marketing purposes.

**You can always contact us if you would like to:**

- review, change or delete the data you have supplied us with (to the extent we are not otherwise permitted or required to keep such data)
- object to certain data processing operations (e.g., opt-out from marketing communications)
- receive a copy of your data (in a common machine readable format, to the extent it is required by applicable law)
- raise a complaint on how we have handled your personal data
- ask us any other questions related to the protection of your data

Please email any requests to [property@roger-hannah.co.uk](mailto:property@roger-hannah.co.uk) or write to Roger Hannah Ltd, Century Buildings, 14 St Marys Parsonage, Manchester. M3 2DF.

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 Information Commissioner's Office at <https://ico.org.uk>

**Review of this Policy**

We keep this Policy under regular review. This Policy was last updated in April 2018.