

DATED

23 May 2018

PRIVACY NOTICE provided by JFM Block & Estate Management LLP

relating to

1. All Client Companies connected with a block/estate under a management agreement with us
2. Customers that own properties within those blocks/estates
3. Sub-tenants of those customers
4. Other non-customers with whom we must deal with to carry out our contract
5. Prospective clients/customers whom we deal with

This privacy notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during our management of your block/estate and after it ends. It also relates to the activities we undertake in relation to prospective clients. We are required to notify you of this information under the General Data Protection Regulation.

Please ensure you read this notice (sometimes referred to as a “privacy notice” and any other similar notice we may provide to you from time to time when we collect or process personal information about you. This privacy notice contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

1. **WHO WE ARE**

JFM Block & Estate Management LLP collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

In this privacy notice, references to “we” or “us” means JFM Block & Estate Management LLP

2. **DATA PROTECTION PRINCIPLES**

We will comply with the data protection principles when gathering and using personal information, as set out in our GDPR data protection policy.

3. **THE PERSONAL INFORMATION WE COLLECT AND USE: INFORMATION COLLECTED BY US**

(a.) In the course of Managing your block/estate we collect the following personal information when you provide it to us:

- Name, address, email address, telephone number, mobile number, backup numbers
- Access information, non-resident address, email address, (only if required to carry out our contract).
- Financial details such as bank details and transaction records.
- Images on documents.
- Mortgage Details

The provision of names, addresses, telephone numbers, mobile numbers, backup numbers, access information, non-resident address, email address, and relatives’ details is required from you to enable us to perform our contract as managing agent appointed for and on behalf of your landlord or resident management company. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

- The provision of financial details is required from you to enable us to perform our contract as managing agent appointed for and on behalf of your landlord or resident management company (if applicable).

- The provision of collecting mortgage details is sometimes required from you to enable us to perform our contract, on behalf of your landlord or resident management company (if applicable).
- The provision of collecting images on documents is sometimes required from you to enable us to perform our contract, specifically for verifying identity as managing agent appointed for and on behalf of your landlord or resident management company (if applicable).

(b.) In the course of marketing activities (where applicable) we collect the following personal information when you provide it to us:

- Name, address, email address, email addresses, telephone number, mobile number, backup numbers.
- The provision of names, addresses, telephone numbers, mobile numbers, backup numbers is required from you to enable us to carry out legitimate business interests in instances where we reasonably believe you have an interest in engaging our services.

4. THE PERSONAL INFORMATION WE COLLECT AND USE: INFORMATION COLLECTED FROM OTHER SOURCES

We also obtain personal information from other sources as follows:

- Access information, names, addresses, telephone numbers, mobile numbers, mortgage details from other parties we deal with for the proper performance of our contract such as solicitors, contractors, your neighbours, and managing agents who previously managed your estate.

5. HOW WE USE YOUR PERSONAL INFORMATION

We will typically collect and use this information for the following purposes:

- For the performance of a contract you have with our client (the resident management company or landlord that has jurisdiction over your estate) and pursuant to which we are appointed as their agent.

(and)

- For the purposes of our legitimate interests or those of a third party, but only if these are not overridden by your interests, rights or freedoms. This is only applicable to prospective clients/customers.

In the case of prospective clients/customers, the legitimate interests are that we believe the prospective client/customer wishes to engage a new managing agent, to their own benefit, at some point in the future.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

6. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share the following categories of personal data:

- names
- addresses
- telephone numbers
- mobile numbers
- backup numbers
- access information
- non-resident address
- relatives' details
- Mortgage details
- Email addresses

This personal information may be shared with the following categories of recipients:

- Out-of-hours emergency service providers
- Emergency services
- Debt Recovery firms
- Maintenance Contractors
- Surveying firms
- Regulatory bodies
- Local authorities
- Parking enforcement companies
- Insurance companies
- Insurance brokers
- (internal) Software providers used by JFM companies
- Energy brokers
- Solicitors
- Loss adjusters

This data sharing enables us to perform our contract as managing agent or legitimate business interests (for marketing).

Some of those third-party recipients may be based outside the European Economic Area — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA'.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

7. WHERE YOUR PERSONAL INFORMATION MAY BE HELD

Information may be held at our offices and those of our group companies, and third-party agencies, service providers, representatives and agents as described above.

We have security measures in place to seek to ensure that there is appropriate security for information we hold including those measures detailed in our GDPR data protection policy.

Or, for example, a set number of years after a data subject ceases to be a lessee in that development.

8. HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

- We will hold names, addresses, email addresses, telephone numbers, mobile numbers, backup numbers, access information, non-resident address, email address, relatives' details for the duration of our management contract and seven years after the ending of our contract.
- For prospective clients we will hold names, addresses, email addresses, telephone numbers, mobile numbers, backup numbers, access information, non-resident address, email address, relatives' details for 6 years or upon written request of a previously-interested party.

9. REASONS WE CAN COLLECT AND USE YOUR PERSONAL INFORMATION

We rely on contract as the lawful basis on which we collect and use your personal data.

In the case of prospective clients, we rely on legitimate interests as a reason for storing this data. Those legitimate interests are as follows:

- The prospective client will have shown an active interest in JFM being appointed as managing agent.
- We, as a company, have reasonable grounds to believe that the prospective client has an interest in JFM being appointed as managing agent.

10. TRANSFER OF YOUR INFORMATION OUT OF THE EEA

We may transfer your personal information to the following which are areas located outside the European Economic Area (EEA):

- In the case of Google applications including Google Drive, Google Sheets and Google Forms – Various areas of the United States of America including The Dalles, Oregon; Atlanta, Georgia; Reston, Virginia; Lenoir, North Carolina; and Moncks Corner, South Carolina on 'cloud' servers in order to benefit from the organisation and efficiency associated with those applications.
- In the case of Dropbox for Business – San Fransisco, United States of America 'cloud' servers in order to benefit from the organisation and efficiency associated with this software.
- In the case of Carbonite backup software - Boston United States of America 'cloud' servers in order to benefit from the security associated with this software.

The United States of America do not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision that The United States of America provide an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal information will be subject to the following safeguards:

In the case of Google applications, Google have confirmed compliance with the restrictions set out by the EU in relation to the storage of personal data by operating under an EG European Commission Approved Contract (as permitted under article 32 of the [General Data Protection Regulation](#)) that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information. To obtain a copy of the contract and further information about the company's safeguards, please follow the below link:

<https://cloud.google.com/security/gdpr/resource-center/>

In the case of Dropbox for Business, the company have confirmed compliance with the restrictions set out by the EU in relation to the storage of personal data by operating under an EG European Commission Approved Contract (as permitted under article 32 of the [General Data Protection Regulation](#)) that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information. To obtain a copy of the contract and further information about the company's safeguards, please follow the below link:

https://www.dropbox.com/en_GB/security/GDPR

In the case of Carbonite backup software, the company have confirmed compliance with the restrictions set out by the EU in relation to the storage of personal data by operating under an EG European Commission Approved Contract (as permitted under article 32 of the [General Data Protection Regulation](#)) that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information. To obtain a copy of the contract and further information about the company's safeguards, please follow the below link:

<https://www.carbonite.com/what-is-carbonite/gdpr/>

If you would like further information please contact us. We will not otherwise transfer your personal data outside of the [United Kingdom OR EEA] or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

11. YOUR RIGHTS

Under the [General Data Protection Regulation](#), you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us
- let us have enough information to identify you
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them

12. **KEEPING YOUR PERSONAL INFORMATION SECURE**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

13. **HOW TO COMPLAIN**

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

14. **CHANGES TO THIS PRIVACY NOTICE**

This privacy notice was published on 23 May 2018 and last updated on 23 May 2018

We may change this privacy notice from time to time, and when we do we will inform you.

15. **DO YOU NEED EXTRA HELP?**

If you would like this notice in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).