

Ascentia Lettings & Property Management Ltd

PRIVACY NOTICE FOR LANDLORDS

Data Controller:

Ascentia Lettings & Property Management Ltd

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Telephone Number: 01635 522111

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What this Notice is about

This Privacy Notice tells you what information we obtain and hold about you as a Landlord and property owner. It explains what information we collect, why we collect it, and what we do with it, as well as who we share it with. We collect and handle personal information about our Landlords and prospective Landlords. This includes arranging lettings, property management (including dealing with repairs), rent collection, dealing with any complaints, maintaining our accounts and records, tenancy terminations and administering tenancy deposits.

We call this information “your information”. It is also referred to as “data”.

Where this notice is given to more than one person it is given to each of you separately.

You should read this notice when you give us information so you are aware of how and why we are using this. Please update us if any information supplied by you changes.

Why we are giving you this notice

We are required by data protection law to give you this notice. We must be open with you about why information is collected about you and then what is done with it. We must act fairly in relation to this information. You have various legal rights relating to this information which are spelt out in more detail in this notice.

If you are already a Landlord some of the items in this notice may not be relevant to you.

In order that we can collect or use information about you there must be a legal basis or gateway for doing so. This notice identifies the relevant gateway for the various types of information we collect and hold about you. A detailed explanation of these gateways is given in this notice.

Under data protection legislation we can only process data “as necessary” and only to the extent that it is needed. For example, we can use your bank details regarding payments and other limited purposes only. However, in certain instances, as necessary, we can share any of your data. We may also share any of your data, as necessary, with the police/law enforcement agencies or regulatory authorities.

The data we collect/hold about you

We use different ways to collect data about you including the information you supply to us.

As necessary personal data is processed by us relating to Landlords as applicable. We may collect some or all of the following personal data:

- Full Name
- Date of Birth
- UK Address
- Overseas address if NRL statues applies
- Email Addresses
- Telephone Numbers
- Business Name
- Job Title
- Profession
- Bank Details
- Land Registry information with regard to with regard to the property to be let.
- Current mortgage details on the property and consent from the mortgage lender.
- Head lease information and consent to rent from any head lessee.
- Landlords insurance details including insurer and policy number.
- Buildings insurance details including insurer and policy number.
- Contents insurance details including insurer and policy number
- We also generate and use data internally, e.g. our rent records.

We also collect and receive data about you from third parties. Public bodies such as local authorities or the police, or other law enforcement agencies may give us information about you. Information may be given to us relevant to Council Tax by the local authority. Utility companies or service providers may also give us personal information about you. Any information which we receive in this way is set out in the Table to this privacy notice which gives you more details about information which we can receive from third parties.

Sharing data with others

We will share information we hold with others where this is necessary. When we do this, we must comply with data protection legislation. Information can be shared with the Tenants and Tenant Guarantors of the property for which you have agreed a tenancy. Contractors/ suppliers; utilities and service providers; tradespeople; financial organisations (including banks and insurance companies); debt collection and tracing agents; public and government bodies (including those who administer benefits, such as the Department for Work and Pensions or the local authority); courts; police and law enforcement agencies; taxation authorities; local authorities in relation to Council Tax and regulatory functions; letting and managing agents. We may need to share information with your next of kin etc., e.g. in an emergency. We also may share information with professional advisers such as lawyers and accountants or an advice agency which involves sharing information about you with them. If the Let property is Leasehold we may share information to the freeholder, managing agent etc. for a block of flats. We also send notifications to and have correspondence with any tenancy deposit scheme protecting any tenancy deposit which has been paid. In some

cases, we may be under a legal obligation to provide information. What we share will depend on what is necessary in the circumstances and more details are given in the Table in respect of different kinds of information which we hold about you.

Search engines, websites, etc

As necessary, we obtain information about you which is publically available via search engines such as but not limited to Google or Facebook and websites. This will include information about you which you yourself made public. Further details are set out in the Table. However, when doing so we make sure that we comply with applicable guidelines under data protection legislation.

Obligation to process data

There are various regulatory requirements which may mean that we need to give information about you to public or local authorities or other regulatory authorities.

Legally we must also hold and process information relating to any tenancy deposit which you pay to us including sharing your information with a deposit scheme by which any deposit is protected.

Under any statutory licensing schemes applicable to the property we may be required to give information to the local housing authority relating to your ownership of the Let property.

Utilities

In line with advice from the Information Commissioner we consider that it is in the legitimate interests of utility companies to receive information about the Landlord of the Let property to enable them to bill you for utilities.

Council Tax

We notify local authorities of your liability with regard to Council Tax. Local authorities are entitled to serve notice upon us requiring this information if they choose to do so.

Why we collect data and the legal basis for processing your personal data

We must tell you why we collect and hold information about you.

We must also have a legal basis before we are allowed to collect or process your personal data. Processing personal data includes recording, storing, altering, using, sharing or deleting data. We only need one of these “gateways” and for our purposes they are –

- You consent. Consent may be requested in certain cases, but generally we do not rely on your consent to process your personal data.
- To perform our contract so that we can carry out our responsibilities.
- Compliance by us with a statutory or other legal obligation.
- Where this is in your vital interests, e.g. if there is a life-threatening situation.

- Where we are pursuing our own legitimate interests or those of a third party. This will not apply if our interests are overridden by your interests or your fundamental rights and freedoms. We must carry out a balancing exercise therefore to decide whether we can rely on this gateway to ensure that it applies. In each case we have done this, and we do not consider your interests, rights or freedoms outweigh our own or those of the third party concerned.

This notice identifies the relevant gateway applicable in each case. In some cases, we will rely on more than one gateway depending on the particular purpose for which we are using your data.

Additionally, any data must be processed by us fairly and openly.

Why we process your data

The various purposes for which it may be necessary for us to process various categories of your information include: -

- In our legitimate interests to establish identity of the Landlord of the property to be Let
- In our legitimate interests to establish ownership of the property to be Let
- Our legal obligation to check a Non resident Landlord status
- To perform our contract to complete the tenancy agreement
- For contractual performance for rent payment including banking details
- For contractual performance for managing the tenancy and the property
- For contractual performance and/or in our legitimate interests for record keeping
- For contractual performance, on behalf of the Landlord of the property to be Let for arranging repairs and maintaining the condition of the property and keeping it in a safe condition.
- For contractual performance on behalf of the Landlord of the property to be Let for recovering debts and other payments due, including any possession proceedings
- The legitimate interests of the relevant Local Authority for administering liability for Council Tax
- The legitimate interests of relevant Water supply and service providers relating to arranging and paying for utilities and services
- In legitimate interests of the Tenants of the Let property in relation to tenancy termination including the return of any deposit
- In our legitimate interests for processing complaints
- To perform our legal obligations to provide information to public or local authorities who are legally entitled to require this information
- In your vital interests for contacting next of kin etc., in an emergency
- In our legitimate interests for the storage of emails, records of calls and other communications
- In accordance with our legal obligations if you exercise your rights under data protection law
- To perform our legal obligations for compliance with legal and regulatory requirements
- In our legitimate interests for the establishment and defence of legal rights

We may change the purposes where this is compatible for the purpose for which we obtained the data originally. If we need to use your data for a non-compatible purpose we will notify you and explain the legal gateway that allows us to do so. We may process your information without your knowledge where this is required or permitted by law.

More information about what we do with data and why, along with the relevant legal gateway is given in the Table. This also tells you who we share data with and receive it from.

Retaining Communications

We will monitor, record and retain your calls, emails, text messages, social media messages and other communications. This is in our legitimate interests to maintain an accurate record of these. This may be necessary to manage the tenancy or the property. We need these records for our ongoing dealings with you, including our data protection obligations.

Length of storage of data

Data can only be stored on a time limited basis and not indefinitely. We will hold personal data about you for the duration of your tenancy and for seven years after your tenancy has ended. This is the statutory limitation period six years plus a further year to allow for service of proceedings should proceedings commence later. We are also required to retain information for up to six years for tax purposes.

Storage and security of data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

All our information is stored securely electronically on servers or devices. Certain information is also retained on a secure basis in hard copy format.

Telephone calls

To protect our legitimate interests telephone conversations may be recorded electronically for monitoring and to ensure that we have a record of what is said. You or others may leave messages when calling.

Holding data outside the European Union

Our email account and web provider is the provider specified in the Table. Our email account is web based. Providers store related data internationally and not necessarily within the European Union. The recipient of this data is the provider concerned.

Your rights

Where we hold personal data about you, you are the data subject. Data protection legislation gives you a number of rights. To exercise any of these rights you should contact us. You can do so by email at the address given above or you can telephone us on the number given above. You can also write to us at our address given at the top of this notice. Normally no fee is payable.

In particular you have a right to object to the processing of your information where we are processing this in our own legitimate interests or those of someone else. This applies if you feel that this impacts on your own interests or your fundamental rights or freedoms.

These rights are as follows –

- Access – you have the right to make a request to be told what personal data we hold about you. This is a right to obtain confirmation that data has been processed and to have access to your personal data and the right to information details which should be provided with the privacy notice.
- Correction/Rectification – if you consider any data we hold about you is inaccurate you can tell us so that where appropriate this can be corrected. Where a mistake is made in data processing then you can ask to have it rectified. Any third parties who have received the data from us should then be told of the rectification and you should be informed by us of any such third parties.
- Erasure – you have a right to ask us in certain circumstances to erase any data we hold about you (the so called right to be forgotten). Individuals can request the right to have personal data erased to prevent processing in specific circumstances, i.e. it is no longer necessary, consent has been withdrawn, there is an objection and where applicable your rights etc., override the legitimate interests to continue our processing, or data has been unlawfully processed.
- You can object to our processing of data – this allows you to object to our processing of data about you. We must then stop processing data unless we can establish legitimate reason for continuing. In particular this applies where we are relying on our own legitimate interests or those of a third party to process data but it can also apply in other situations.
- Restricting processing – you can ask us to suspend processing of your personal data and we must then restrict processing of data. This includes where you are contesting the accuracy of a statement or the lawfulness of the processing.
- Data portability – this allows individuals to reuse their personal data for their own purposes across different services allowing them to move, copy or transfer personal data more easily.

Withdrawal of consent

Where your consent provides us with the legal gateway to process data about you you can withdraw this at any time by telling us by email or post using the telephone/addresses given above.

Complaints

We operate our own internal complaints policy and if you have any concerns about the way in which we collect or handle data please contact us.

Additionally, you have the right to lodge a complaint with the Supervisory Authority who is –

Information Commissioner
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

TABLE

Introduction

About this Table

As necessary, we collect, use and otherwise process different categories of information (data) about you relying on the various legal gateways available to us. This relates to your application for a tenancy/residency and, if this goes ahead, so that we can manage the tenancy and the property along with associated matters. This part of this notice gives you a general description of these processing activities for the different categories of information and the purposes for which we process your information. If you consider that we have not given sufficient details of what we do then you can make an access request for more information.

Background

Renting out residential accommodation and managing tenancies and rental properties is multi faceted. As Landlords are at the centre of this service, we must process your data for a large number of different purposes. Data protection law requires us to give you information about these processing activities as concisely as possible. To do so we have split information about you into different categories, which is in line with requirements in the legislation. We also have to tell you the extent for which your information can be used and shared. Due to the nature of our business information falling into one category will be combined with information in other categories to be handled by us as permitted for the stated purposes under the relevant legal gateway which we have to identify. For example, information about your identity/contact details will be combined with other categories of information to correctly identify you, e.g. when we compile our accounts or pass information about a repair over to a contractor so that they can deal with the problem at the property you Let. However, we only do this to the extent that it is necessary in the circumstances.

Expressions used

To make this Table as concise as possible we employ a number of expressions –

Handle information – collecting, compiling, using or storing information (data).

Use information – when we use information this means we consult it, compile it, refer to it to make a decision, or act on it, or combine it with other data. When using it in this way we may have to alter it.

Share data – this includes transferring data to someone else where this is necessary, or receive it from a third party.

Collect data – this is where we receive information either from you or from a third party.

Compile data – this is where we use information about you which we have collected to generate information about you, e.g. our records..

Next of kin etc. – this includes close relatives.

Altering Data

We are required by data protection legislation to keep your information up to date and it is of course in our own legitimate interests to do so for us to ensure that we have accurate records. For example, we keep our record of your rent payments up to date as they are paid.

Storing Data

We keep information both electronically and in a manual filing system to maintain our records. We do this because we need to use it from time to time. Normally the legal gateway permitting us to do so which will apply will be the same as applies when we use the data. Additionally, however, there are legal obligations to retain data under data protection law, taxation legislation and housing law. We also need to do so to fulfil our contract with you. In our own legitimate interests, we also need to retain information to deal with enquiries or disputes and for audit purposes.

Destruction of Data

We delete/destroy data once it is no longer needed. This is a requirement of data protection law. This notice tells you the period for which we normally store data.

What this Table tells you

Information is handled as necessary from time to time. As already stated, information falling under one category can be amalgamated with or added to information in another category in order to carry out the stated purposes.

Part 1 of this Table tells you, depending on the relevant category of your information, what our processing activities are and what is the legal gateway permitting processing as well as the purpose for which we carry out these processing activities.

Where the legal gateway in question is our own legitimate interests (or those of a third party) we identify the relevant legitimate interests.

Details about sharing data are set out in Part 2, whether we transfer it to someone else or receive from a third party.

Part 1 – Collecting, compiling, using and storing your information

In this Part we list out the different categories of your information, briefly explain them where needed, explain what we do with the information and why, as well as specifying the relevant legal gateway we rely on to do so.

We use the word “handle” to cover collecting, compiling, using or storing this information.

Identity and contact details

1. This includes name address, contact details telephone and email
2. We handle this information in order to manage the tenancy and the property. This is done to perform the contract.

3. We also handle this information which relates to next of kin etc., to contact them in the event of an emergency. This is to protect your vital interests.

Personal and background information

1. This information is handled to confirm your authority to instruct us to offer the property for Let.

Bank details

1. This includes details of your bank, building society or other paying organisation, including those operating digitally/online.
2. We handle this information in order to make payments to you. This is done to perform our contract.
3. We also handle this information as part of our verification of your status including to protect against money laundering. This is in our legitimate interests.

Tenancy details

1. This includes renewals of the tenancy. Information within this category includes the address of the property, start date for the tenancy, period of occupancy, rent and other payments.
2. We handle this information to prepare and complete the tenancy agreement and then to manage the tenancy and the property. This is done to perform our contract.
3. Tenancies are renewed by agreement. This will involve a request from you. We handle information about the renewal of tenancies. This is done for contractual performance.
4. Where you are a joint Landlord details of any other joint Landlord tenant or are linked with the tenancy/property.
5. We handle this information to prepare and complete the tenancy agreement and thereafter to manage the tenancy and the property. This is done so that we can perform our contract..

Deposits (if any)

1. We handle this information to deal with the deposit received and to administer the deposit. This includes handling information about Landlord. This is done both for contractual performance and to ensure compliance with legal obligations relating to handling deposits under the Deposit Protection Legislation. We also handle deposits at tenancy termination and this is dealt with under that section.

Rent and payment collection

1. This includes records we compile to record receipt of rent and other payments to you and associated documentation relating to such payments.
2. We keep this information in order to compile correct and up to date records. This is done for contract performance.

Recovery of arrears, claims and possession proceedings

1. In the event of non-payment of rent by the Tenants or other payments due, or if there is non-performance of the contract (including allegations against ourselves) then we record this and enter into relevant communications. This includes information and documentation related to any proceedings which may be commenced by the Landlord of the Let property, including proceedings to recover possession of the property.
2. We handle this information in order to pursue recovery of what is owed to the Landlord of the Let property This is done This is done for contract performance and in our Landlords and our own legitimate interests. This is to protect our Landlord property interests, to enforce rights and to ensure payment due is made, as well as to defend any claims brought against us or the Landlord.

Repairs/housing standards/health and safety

1. This includes condition surveys, inspection reports, reports of repairs required and information about actions taken. This extends to conditions and standards generally at the property including health and safety, e.g. gas safety.
2. We handle this information to ensure that the property and its contents are properly maintained. This is done both for the purposes of contractual performance and, where applicable, to comply with legal obligations.

Council Tax liability

1. Notification is given to the local authority in relation to our Landlords liability for Council Tax. This can include information about the period prior to a Tenant occupation.
2. We handle this information in order to ensure that the liability for Council Tax is dealt with correctly. This is done to protect our Landlords legitimate interests and those of the local authority. These are for the correct billing and collection of Council Tax and to ensure that the Landlord does not have to meet Council Tax liability where this is not appropriate.
3. In the event of the local authority serving a statutory notice we then we must supply this information to comply with our legal obligations.

Water charge payments

1. This relates to notification to a water company in relation to our Landlords liability for Water and sewage charges. This can include information about the period prior to a Tenant occupation. In the legitimate interests of the water company concerned. This is to ensure that legal liability for payment of water charges is correctly established and discharged.

Utilities and other service providers

1. We arrange and establish liability for payment of gas and electricity consumed at the property and any services provided. This can include information about the period prior to a Tenant occupation. These services may be provided as a requirement under the tenancy agreement. It includes communications about changes of tenants, interruptions and disconnection of supply and work to be carried out in connection with utilities and services such as the installation of smart meters/replacement meters.

2. We handle this information in order to arrange provision of utilities and services and ensure that the correct liability for relevant charges is established and that these are paid for. This is done in our Landlords legitimate interests and those of the utility company/provider concerned. This is to ensure utilities and services are provided and that liabilities are paid.
3. We also handle this information in order to deal with breakdowns, interruptions and disconnections and to ensure that the appropriate quality of service is provided. This our Landlords and our own legitimate interests. These are to ensure that requisite utilities and services are available and are provided at the property.

Universal Credit/Housing Benefit/Local Housing Allowances

1. Where eligible a tenant of a property may be entitled to the appropriate welfare benefits to assist them to pay rent. Information may be required by the Department for Work and Pensions (DWP) or local authority to verify entitlement. Normally, payment of benefit is made direct to the tenant; however, if the tenant is vulnerable or there are arrears, payment of benefit can be made direct to the Landlord or us. This extends to Council Tax reductions (the old Council Tax benefit).
2. We handle tenancy details and rent payment records, including information about arrears of rent, relevant to the processing of claims and the administration of benefits. This is done for contractual performance. We handle information relevant to applications for benefit and in particular applications for direct payment to the Landlord or ourselves including reasons for non-payment of rent. This is for contractual performance.
3. On occasion where direct payment has been made to the Landlord or us there may be claims by the benefit authority for recovery of overpayments. We handle information relevant to such claims. This is for contractual performance.

Tenancy termination

1. A tenancy may run out and the tenant leaves. Tenants can leave early while the tenancy is still running on. We may serve notice requiring the tenant to vacate and, if need be, enforce this by court possession proceedings on behalf of our Landlord.
2. Tenancy terminations of whatever kind also involve the return of any deposit paid, possible claims against guarantors, claims on rent insurance or property insurance, arrangements for tenants/residents to vacate the property, tenants/resident's property being left behind. They also give rise to issues around the state and condition in which the property has been left, e.g. cleanliness.
3. We handle information relevant to these matters concerning tenancy termination. This is for contractual performance. This is to ensure that all appropriate financial claims by either party against the other are correctly dealt with. These include our obligations on behalf of our Landlord in relation to the refund of deposits, to comply with our contractual obligations between us and the tenancy deposit scheme with whom the deposit is protected.

Complaints

1. We operate a complaints procedure which may be informal. Although we will do all we can unfortunately sometimes things go wrong so complaints may arise.
2. Information handled concerns complaints which you may make or which may be made on your behalf. These will give rise to communications and records being compiled by us.

3. We handle complaints with a view to resolving these, although this might involve external intervention, e.g. by the courts.
4. We handle complaints for contract performance. This is also done in our own legitimate interests. These are to protect ourselves against claims and to ensure that the complaints are properly resolved.

Correspondence etc

1. Correspondence includes all ways in which we receive communications from whatever source. This includes emails, text messages, social messaging and messages, letters and documentation.
2. We handle these communications for the management of the tenancy and the property, as well as associated matters arising under the various categories of information referred to in this Table. This is done for contractual performance where applicable, to carry out any applicable legal obligations imposed on us, to protect our Landlords legitimate interests. These legitimate interests are to ensure that we have the necessary information relating to these matters and for accurate record keeping.

Insurance

1. Our Landlord of the Let property may insure the building and may insure contents belonging to the landlord. The Landlord may also insure against public liability, including liability to the Tenants, for injuries and rental insurance, in the event of rent arrears or other tenancy default.
2. We handle information about you which may be relevant to the your insurances to arrange cover, to administer insurance contracts, to renew insurances and to make claims. To ensure that appropriate risks are adequately insured against and to recover any sums due to the Landlord under the policy as a result of claims. This is done for contractual performance and the legitimate interests of the insurers.

Flat management

1. This applies in particular where the property is a flat. This flat will be held by the our Landlord of the Let property under a lease or subject to other contractual arrangements which will set out various responsibilities for the upkeep, insurance etc., of the block including common areas. The lease or other arrangements place contractual obligations on the our Landlord.
2. We handle information about you in order to carry out responsibilities under these leases/arrangements. This is done for contractual performance so as to ensure that respective obligations are properly performed.

Part 2 – Sharing Information

Introduction

We share your information with various persons, organisations and public authorities as necessary. This involves us either transferring your information to others or collecting it from them, depending upon the circumstances. This Part of the Table gives you details about this. It can be a two-way traffic between ourselves and others. In some

instances, we may collect information about you from someone else following a request by us to them to provide this information.

Where we collect information from others (third parties) we have to tell you the source of this information, whether or not it is publically accessible, the nature of the source (i.e. whether it is publically or privately held) and the types of organisation from whom the information is obtained. Where possible we need to name the source as well but often this cannot be done. The required details appear in this Part of the Table.

Where information is received from a private person/body or a public authority, this information will not normally be publically accessible, however in some instances it will be. Information which will be publically accessible will be information such as Council Tax bandings and information available in public registers, e.g. registers of births and other available public registers.

We share identity and contact details with all persons, organisations/authorities referred to below. This category of information is linked with the other information in every category for the purposes and under the legal gateway specified under each of the other categories of information. This is to ensure that you are correctly identified and, if need be, can be contacted.

A – Sharing of certain categories of your information

We share certain categories of your information (both transferring it to them and collecting it from them as necessary) with private persons/organisations and public authorities as necessary.

In Section B we go onto explain that, as necessary, certain private persons/organisations and public authorities can share any of your information (irrespective of its category).

Table 1 below identifies the different categories of your information and specifies the private persons/organisations/public authorities with whom these different categories of your information are shared as necessary. This Table should be read in conjunction with Table 2 (private persons/organisations) and Table 3 (public authorities). Tables 2 and 3 explain why we share your information with these persons/organisations/public authorities and the legal gateway which allows this to happen.

Depending on the category of data concerned you should also refer to that category under Part 1 above because the purposes set out for which we handle data and the legal gateway for doing so also usually apply when we share data with others.

Table 1 – Data categories and who they are shared with

Data category	With whom we share the data
Personal/background information	The Tenants of the Let property. Trades contractors assisting in carrying out our Landlords responsibilities under the tenancy agreement and for the management of the tenancy and the property for contractual performance; insurers; banks etc. next of kin etc

Tenancy details	The Tenants of the Let property other landlords, benefit authority, taxation authority
Deposits (if any)	The Tenants of the Let property. Tenancy deposit body; debt collectors/tracing agents; taxation authority
Rent and other payments	Bank, Taxation authority.
Repairs/housing conditions/health and safety	The Tenants of the Let property contractors, tradespeople, etc., deposit protection body, joint tenants/residents, freeholder flat management etc., guarantors
Council Tax liability	The taxation authority (local authority)
Water charges	Water companies
Utilities and services	Utility suppliers and service providers
Universal Credit, housing benefit etc.	Department for Work and Pensions or local authority, regulatory authority.
Termination of tenancy	Taxation authority, deposit protection body, joint tenant/resident/guarantors, utility and service providers, freeholder managing agents etc.
Correspondence etc.	The Tenants of the Let property. Persons/organisations/authorities listed in Section A.
Insurance	Insurers, banks etc.
Flat management	Freeholders, flat managing agents etc.

Table 2 – Private persons/organisations

Categories of persons /organisations	Purpose and legal gateway
Tenants Joint tenants/residents	We provide information to Tenants to perform contract compliance and compliance by us with a statutory or other legal obligation
Contractors/tradespeople/service suppliers	Assisting in carrying out our Landlords responsibilities under the tenancy agreement and for the management of the tenancy and the property for contractual performance. In certain cases, this is also to comply with current legal obligations in relation to housing conditions and health and safety, e.g. gas, electrical and fire alarm maintenance and inspection. We will also provide our Landlords contact details to contractors etc., to facilitate access to the Let property for contract performance.
Utility companies and service providers	Arranging for utilities/services and establishing liability for payment along with administering their supply in our Landlord of the Let property legitimate interests and those of the provider. This is to ensure utilities/services are provided and that liability is correctly established. Utility companies also have certain statutory obligations to perform, e.g. metering. This is in the legitimate interests of the utilities/service providers to ensure that they can effectively carry out their various activities.
Credit reference agencies	We request and consider credit and other referencing relating to deciding on the suitability of tenants and residents for a tenancy. The Landlords details are shared for contractual performance and in the legitimate

	interests of the referencing supplier. This may include FCC Paragon who undertake referencing services on our behalf.
Next of kin etc.	To make contact with them in the event of an emergency to protect your vital interests.
Insurers	To arrange, on behalf of our Landlord of the Let property public and other liability insurance and rent insurance and to make claims. This in the legitimate interests of the insurers. These are making sure that appropriate insurance is arranged, and the policies are correctly administered.
Banks and lenders	Where our Landlord of the Let property has loans, information regarding tenancies may be shared to arrange and administer loans. This is in our Landlords legitimate interests and those of the lenders. Your information can also be shared for the purposes of preventing and detecting money laundering and fraud.
Flat freeholders, managing agents etc., where the property is a flat.	The management of the tenancy and the property. Under leases/other contractual arrangements they are entitled to certain information, e.g. who owns the flat and the terms of any letting in the legitimate interests of the Freeholders, managing agents etc and to ensure contractual obligations.

Table 3 – Public Authorities

Categories of persons /organisations	Purpose and legal gateway
Home Office	For the performance of our legal obligations
Benefit authority	The administration of benefits such as Universal Credit (by the Department for Work and Pensions) and the housing benefit/local housing allowance by the local authority. This includes applications for direct payment of benefit to the Landlord of the Let property or ourselves. It extends to claims by them for overpayment where we receive direct payments. This is for contractual performance and in our legitimate interests to ensure that we collect rent and that amounts properly due to the Landlord are received.
Deposit body	Under housing legislation we are required to protect any deposit which is paid in connection with the tenancy. We may pay this into a custodial scheme which holds the money or alternatively hold it ourselves, on behalf of our Landlord of the Let property. We have to register the deposit with the deposit body concerned. This is to comply with our legal obligations. During the course of the tenancy it may be necessary to give details of any changes to the deposit body to comply with our legal obligations. On the termination of the tenancy for contractual performance we must arrange for the return of the deposit in whole or in part depending on whether there are any claims on it. In the event of disputes these can be submitted to adjudication in which case it is necessary for information to be provided to the deposit body concerned (and its adjudicator) in our legitimate interests to pursue or defend claims. This is also contractually required under the rules of the scheme.

Taxation authorities	These are HM Revenue and Customs and (in the case of Council Tax and Council Tax reduction schemes) local authorities, as well as any other public authority having power to levy taxes or charges. We are required by law to make appropriate returns to comply with legislation imposing taxes etc. In the case of Council Tax this is required where statutory notice to that effect is served on us. Otherwise, we share information with the local authority relating to Council Tax. This is legitimate interests to ensure that Council Tax is correctly administered and in the legitimate interests of the local authority to collect information for the same reason.
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B – Private persons/organisations/public authorities with whom any information is shared

As necessary, we share all of your information (irrespective of its category) with certain private bodies/organisations/public authorities. This includes transferring your information to them and receiving it from them. These are

Category of person/organisation/public authority	Purposes and legal gateway
Professional advisers	Assistance and advice regarding the management of the tenancy and the property for contractual performance. Where we handle your information under some other gateway and a professional adviser assists or advises this will for the same purpose and under the same legal gateway. If it is in the legitimate interests of ourselves or someone else then those interests will be the same. These are to ensure that we act appropriately and properly as well as according to the law.
Police/law enforcement agencies*	Prevention/detection of crime. This is to protect our Landlords property and enforce rights and to enforce the law.
Regulatory authorities*	To carry out their functions in their legitimate interests. These are to enforce legal requirements. On occasion, we may be under a legal obligation to provide your information, particularly if a notice to that effect is served on us. This can include an ombudsman or accreditation or similar scheme of which we are a member. It also includes water companies, utility providers who are exercising their functions as statutory undertakers.
Courts*	The administration of Justice in our and our landlord legitimate interests. These are to pursue and defend claims.

* These are public authorities

Names of persons/organisations/public authorities with whom information is shared

Where we are able we have to provide you with the identity of the persons/organisations/authorities which are referred to in Tables 1, 2 and 3 above.

Email provider: Microsoft outlook and Letmc.com
Website provider/host: Letmc.com and Dropbox.com
Accountant: James Cowper Kreston, Newbury
Ascentia Lettings& Property Management bank: Royal Bank of Scotland
Landlord's insurance (rent insurance and/or public liability): FCC Paragon
Local authority for the property: Varies
Contractors etc., regularly employed to maintain the property: D.J Pink General Builders, Colin Brown Electrical, RSK Plumbing & Heating, Thames Valley Boiler Care, MJ Butterwick Ltd, CAP Locksmith, Kingfisher Services, Triton Showers, Mira Showers, Aqualisa Showers, Brand Windows, D.R Watson Cleaning Services, A&J Cleaning, DAS Ltd (Domestic Appliance Specialists), Thatcham Glass, E.W Malone Roofing.

Water Company: Varies upon Location
Deposit protected with: TDS – Tenancy Deposit Scheme
Freeholder/flat managing agent (where the property is a flat): Varies where applicable
Service providers (e.g. Broadband): Varies where applicable
Gas and electric company: Varies where applicable