

PRIVACY NOTICE

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, or at any time thereafter.

OUR COMMITMENT

JCF Property Management Ltd collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the <u>General Data Protection Regulation</u>. We are responsible as 'controller' of that personal information for the purposes of those laws.

At JCF, we are committed to protecting all personal information that we collect and store in the course of conducting business. We will comply with the data protection principles when gathering and using personal information, as set out in our GDPR data protection policy.

PERSONAL INFORMATION THAT WE COLLECT AND STORE ABOUT YOU

To enable us to perform our **contract** as managing agent appointed for and on behalf of the Client we collect the following personal information when you provide it to us or when we send it to you:

- Name & Contact Details (title which may include marital status, proof of identity, address, home and mobile telephone numbers, e-mail address)
- Emails, Letters and File Notes from or recordings of Telephone Calls
- Charges And Payments on your Service Charge and/or Rent Account
- Bank Details, (which may include payment by Direct Debit)
- Relevant sensitive personal data relating to health and/or disability
- Such personal information required in the course of employment or for legal purposes

To enable us to fulfil a **legal obligation** and for **legitimate interests** in gaining access to your property in order to maintain the building, we may need to also collect the following information:

- Sub-Tenant Name & Contact Details (title which may include marital status, proof of identity, address, home and mobile telephone numbers, e-mail address)
- Keyholder / Emergency Contact Name, & Contact Details (title which may include marital status, address, home and mobile telephone numbers, e-mail address)

We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

PERSONAL INFORMATION THAT WE COLLECT FROM OTHER SOURCES

We may also collect personal information about you from other sources:

- Previous Managing Agent, Letting or other Managing Agents
- Residents, Leaseholders, Sub-tenants, Owners & Directors of the Client
- Land Registry (proof of ownership and lease assignment details)
- Companies House (share ownership and names and details of Company Directors)
- Contractors
- Solicitors, Insurers and claims handlers







HOW WE USE YOUR PERSONAL INFORMATION

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

- For the performance of a contract you have with the Client and pursuant to which we are appointed as their agent.
- 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.

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.

We will collect your personal information for any of the following purposes:

- To identify and communicate with you or your appointed representatives
- To process payments
- To enable us to respond to emergency situations
- To ensure the orderly management of the properties entrusted to our care
- To comply with all relevant legislation

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share the following categories of personal data:

- Name
- Address / Email Address
- Mobile Or other Telephone Number

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

- Registered & Approved Contractors as data processors
- Other professional bodies as data controllers such as Solicitors, Surveyors & Accountants
- Directors of the Client
- Anyone for whom you have given specific consent

This data sharing enables us to perform our contract as managing agent.

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.

WHERE IS YOUR PERSONAL INFORMATION HELD

Personal Information may be held at our office at 322 Upper Richmond Road London SW15 6TL; or by select employees whilst undertaking their duties away from the office; by on-site staff of our Client; and by third party agencies, service providers, representatives and agents as described above.

HOW WE PROTECT YOUR INFORMATION

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.

YOUR RIGHT OF ACCESS TO YOUR PERSONAL INFORMATION

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 has been provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that 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

When providing your personal information to you, we will edit certain information as required or authorised by law, including the personal information of other individuals, information that may be subject to investigation, as well as any confidential commercial information.

If you believe that any of the information that we have collected about you is inaccurate or incomplete you have the right to ask us to change it. If you feel that we have not dealt with your request to your satisfaction, you are free to follow our complaint resolution process.

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 info@jcfpropertymanagement.com, call 020 8785 9700 or write to us at 322 Upper Richmond Road London SW15 6TL
- let us have enough information to identify you (e.g. Full Name, Address And Property Address),
- 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

HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION

We will hold your personal information, as required under UK tax law, for a minimum period of 6 years, and under certain circumstances we may retain this information for up to 15 years.

When we no longer require your personal information for the purposes stated in this policy we will automatically remove it.

HOW TO REGISTER A COMPLAINT

We hope that we can resolve any query or concern you raise about our use of your personal information. You may register a privacy related complaint by contacting the Managing Director. At that time the Managing Director will review JCF's data complaint procedure with you and will investigate your complaint. If a complaint proves to be justified, we will take immediate and appropriate action.

The <u>General Data Protection Regulation</u> gives you right to lodge a complaint with a supervisory authority. 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.

REVIEW

This policy was produced in June 2025 and will be reviewed every 2 years or earlier if legislation requires.

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