

Town & City Management Ltd (TCML) Privacy Policy

1. GENERAL

Town & City Management Ltd (TCML) together with any group companies are committed to protecting and respecting your privacy. For the purposes of data protection legislation, we are the data controller and we will process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 and national laws which relate to the processing of personal data. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

2. VISITORS TO OUR WEBSITE

2.1 We may collect and process personal data about you in the following circumstances:

2.1.1 when you complete forms on our website ("Site"). This includes your name, your telephone number, your email address and home address which is provided at the time of registering to use our Site, subscribing to our services, requesting further services;

2.1.2 whenever you provide information to us when reporting a problem with our Site, making a complaint, making an enquiry or contacting us for any other reason. If you contact us, we may keep a record of that correspondence;

2.1.3 details of your visits to our Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise, and the resources that you access; and

2.1.4 whenever you disclose your information to us, or we collect information from you in any other way, through our Site.

2.2 We may also collect data in the following ways:

IP Address

2.2.1 We may collect information about your device, including where available your Internet Protocol address, for reasons of fraud protection. We may also collect information about your device's operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

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- 2.3 We may use your personal data for the legitimate interests of TCML in order to:
- 2.3.1 provide you with information, or services that you requested from us;
 - 2.3.2 allow you to participate in interactive features of our Site, when you choose to do so;
 - 2.3.3 ensure that content from our Site is presented in the most effective manner for you and for your device;
 - 2.3.4 improve our Site and services;
 - 2.3.5 process and deal with any complaints or enquiries made by you; and
 - 2.3.6 contact you for marketing purposes where you have signed up for these (see section 6 for further details).

Website Links

Our Site may, from time to time, contain links to and from the websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms to the collection and privacy of your personal data and we do not accept any responsibility or liability for these policies. Please check before you submit your information to these websites.

3. **LEASEHOLDERS/TENANTS**

3.1 We collect details such as your name, address, email and telephone number for our legitimate business interests, in order to provide you with property management services as instructed by a property management company, developer or freeholder. We use these details so that we can contact you about matters affecting your property such as maintenance and repair work required to the communal areas of your property and any service charges or ground rent due and payable. Where you fail to pay your service charge or ground rent, we may share your information with our solicitors as part of our debt recovery process. Where you are a director of a Residents' Management Company/Right to Manage Company, we will share your personal data with professional advisers who act for the management company such as accountants, solicitors and insurers where you have asked us to contact them on your behalf.

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3.2 We may take payments for service charge and ground rent over the phone. Please note that we do not collect or share your payment details with third party merchant service providers. You will submit your payment details direct to the merchant services provider subject to their own privacy terms. We will keep your personal data for as long as you continue to be a leaseholder in the properties and also in regard to the following:

- Customer complaints – 3 to 6 years
- Copy correspondence – 3 years

4. CUSTOMERS

4.1 We will collect details such as name, address, email and telephone number when you order goods or services from us either via our Site or we will use this information to process your order and comply with our contractual obligations.

4.2 in order to perform our contact with you, we may also need to share personal data with third parties such as payment providers and postal service organisations to assist in the delivery of goods or services you have ordered;

4.3 We may also advertise your feedback on our website and marketing materials (subject to obtaining your prior consent where necessary);

4.4 We will retain your information as long as we require this to provide you with the goods or services ordered from us. Where you have subscribed to receive marketing correspondence from us we will keep personal data until you unsubscribe from receiving such correspondence from us.

5. SUPPLIERS

We will collect details such as your name and company email address in order to contact you about goods or services ordered with you and to place further orders. We will keep the personal data for as long as we require your goods and services.

6. MARKETING

6.1 In addition to the uses described in sections 3-5 above, we may use [Customer] personal data for our legitimate interests in order to provide you with details about our goods, services, business updates and events] which we think may be of interest.

6.2 You have the right to opt-out of receiving the information detailed in section 6.1 at any time. To opt-out of receiving such information you can email us at mail@townandcity.com or call 01325389689 providing us with your name and contact details.

7. AUTOMATED PROCESSING

We do not undertake automated decision making with your personal data.

8. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

8.1 In accordance with data protection legislation we are required to notify you of the legal basis upon which we process your personal data. We process your personal data for the following reasons:

- 8.1.1 for performance of a contract we enter into with you;
- 8.1.2 where necessary for compliance with a legal obligation we are subject to; and
- 8.1.3 for our legitimate interests (as described within this policy).

9. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

9.1 In addition to the third parties mentioned above, we may disclose your information to third parties for the following legitimate interests of those third parties:

- 9.1.1 to staff members in order to facilitate the provision of goods or services to you;
- 9.1.2 to our affiliated entities to support internal administration;
- 9.1.3 IT software providers that host our website and store data on our behalf; and
- 9.1.4 to a prospective buyer of some or all of our business or assets, in which case personal data including personal data will also be one of the transferred assets.

9.2 We may disclose personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms and conditions and other agreements; or to protect our rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

9.3 We will not sell or distribute personal data to other organisations without your approval.

10. **CROSS-BORDER DATA TRANSFERS**

We will not transfer your personal data outside the European Economic Area.

11. **DATA SECURITY**

11.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

11.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted to our Site; any transmission is at your own risk.

11.3 Information you provide to us is shared on our secure servers. We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

12. **ACCESS TO, UPDATING, DELETING AND RESTRICTING USE OF PERSONAL DATA**

12.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if the personal data we hold about you changes.

12.2 Data protection legislation gives you the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided. You also have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your personal information, please send an email to mail@townandcity.com for the attention of the Directors of Town & City Management Ltd. In certain circumstances we reserve the right to charge a reasonable fee to comply with your request.

12.3 You can also ask us to undertake the following:

12.3.1 update or amend your personal data if you feel this is inaccurate;

12.3.2 remove your personal data from our database entirely;

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12.3.3 send you copies of your personal data in a commonly used format and transfer your information to another entity where you have supplied this to us, and we process this electronically with your consent or where necessary for the performance of a contract; or

12.3.4 restrict the use of your personal data.

12.4 We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Data protection legislation may allow or require us to refuse to provide you with access to some or all the personal data that we hold about you or to comply with any requests made in accordance with your rights referred to above. If we cannot provide you with access to your personal data, or process any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

12.5 Please send any requests relating to the above to our [Data Lead] at [mail@townandcity.com] specifying your name and the action you would like us to undertake.

13. **RIGHT TO WITHDRAW CONSENT**

Where you have provided your consent to the collection, processing and transfer of your personal data, you have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, please contact us at mail@townandcity.com for the attention of the Directors of Town & City Management Ltd.

14. **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to update this privacy policy at any time, and any changes we make to our privacy policy will be posted on this page. We will notify you if there are any changes to this policy that materially affect how we collect, store or process your personal data. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal without your knowledge or consent where required by applicable law or regulation.

15. **CONTACT US**

We have appointed a Data Lead to oversee compliance with this privacy policy. If you have any questions, comments or requests regarding this policy or how we use your personal data please contact our Data Lead (Martin Baker FCMI) at mail@townandcity.com This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at <https://ico.org.uk/global/contact-us/>