

Customer and Community Privacy Notice



Partnering in Property Management Limited (PPM Limited) is committed to complying with its legal obligations under the General Data Protection Regulation (“GDPR”) and to the protection of the rights and freedoms of individuals whose personal data PPM Limited obtains or generates as part of its business operations.

This policy describes how and why we collect, store and use personal data relating to our customers and also the people we engage with in the communities that we work within. It also provides information about individuals’ rights. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

You are our customer if you have asked us to provide services to you, or if you are a tenant, occupier or leaseholder of a property owned by a housing association, local authority, landlord, freeholder or management company to which we provide services to.

We have separate privacy notices for people visiting our website, candidates applying for jobs with us and our supply chain. These are available to view on our website: <http://www.ppm-limited.co.uk/about-us>

If personal information has been provided to us by the property owner or collected from you by us on their behalf we usually act as a Data Processor and may be instructed to process your personal information in accordance with their instructions and their own privacy policy or notice, which they can provide you with.

If we are providing services to you directly, and not on behalf of a property owner, we are the Data Controller. We are then responsible for deciding how we hold and use personal information.

In this policy “we”, “us” and “our” refers to PPM Limited.

What personal data do we hold?

In order for us to operate our business we do require some personal information for our customers. This includes:

- Name
- Address
- Contact Details
- Information about the property or work required
- Additional information which can include pastoral, behavioural or special needs to customers to ensure that their needs are met and to support the safeguarding of our customers and our employees and contractors.

If you are participating in one of our community activities we will only collect enough information to enable you to participate, for example to make sure it is safe for you to participate.

How information is collected

Information can be collected from the following sources:

- From a property owner, landlord or local authority to whom we provide services to;
- When you contact one of our offices to register or enquire about a repair;
- When you speak to one of our employees visiting you in your home or in your community;

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- When we speak to you to arrange an appointment or to progress the services that we are providing to you;
- Via our smartphone and tablet applications;
- When you submit information to us by emailing us;
- By providing personal details because you are interested in receiving a service from us or you want us to send you information regarding our community activities/ work experience or apprenticeship opportunities.

How we use information about our customers

We may use the information that we have for you to:

- Get in touch with you about the services that we have been asked to provide. This could be by letter, email, phone, text, multimedia message or another form of electronic communication – for example we may send you notification of an appointment by text or phone or to confirm an appointment;
- Provide and plan the services that you or the owner of your property has asked us to provide;
- Make sure that we are allocating appropriate resources to you to meet your particular requirements, for example, if you (or anyone in your household) might need extra care (due to age, health, disabilities), we may record this;
- Help provide and improve our services and products;
- Create statistics, test our computer systems, and analyse customer information;
- Report our performance to the owner of the property;
- To record a database of property details such as archetype and condition of housing stock and fixtures, fittings and equipment;
- To handle any complaints that you may have about our service;
- Help prevent and detect debt, fraud and loss;
- Train our staff;
- Ask for your feedback on about the services we have provided you;
- To report any safeguarding issues to the relevant authorities.

If you give us information on behalf of someone else, such as someone in your household, you are confirming that you have given them the information in this policy and that they have agreed to you giving us the information.

Using photographs, digital images, film or video footage and direct quotes

We may capture and hold images about you, such images will be held for one of the following purposes:

- To support case studies and / or reports about what we are doing in the community, which could be published externally.
- To support case studies and / or reports about what we are doing in the community, which will be published internally.

If the data has been collected for external use, it may be used in printed or electronic form and may appear in different publications (including websites, social media sites, television and exhibition panels) within the UK.

The data will be stored on a secure server in accordance with our document and data retention policy.

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All data published will be anonymised.

We will take all reasonable steps to ensure data is used solely for the purposes intended. If you become aware the data is being used inappropriately, you should inform us immediately.

Data Sharing

It may be necessary for us to provide information about you to the owner of your property or to regulatory authorities if we are required to do so by law. We will do this:

- To provide you with the service that you or the property owner has asked us, which might include giving information to members of your family or household;
- In connection with our agreement with the owner of your property;
- In connection with our agreement with you;
- To demonstrate that energy efficiency or Green Deal funding conditions have been met;
- To relevant public authorities or utility companies e.g. gas and electricity companies;
- To help find and prevent debt, fraud or loss;
- For legal or regulatory purposes;
- For any associated legal action.

We sometimes subcontract our service to others, and it may be necessary to pass your details to our sub-contractors or suppliers for this purpose. They are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also pass your information to organisations that regulates us or who inspect installations for example the Health and Safety Executive or GasSafe. This may include the property address and postcode, and information about appliances that have been installed in your property.

Security

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

We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. Please remember that no method of transmission over the internet (for example by email or webmail), or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

Your rights as a data subject

If we are acting as a Data Processor you may need to make a request to exercise your Data Subject rights directly to the Data Controller. However under certain circumstances, as a data subject you have certain rights which you may exercise if we are in possession of, or are processing, your personal data. Specifically:

- **Right of access** – you have the right to request a copy of the information that we hold about you.

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- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – you have a right, in certain circumstances, to ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing of your personal data.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.

To exercise these rights please contact us using the contact details set out in the Contact Information section below. In the event that PPM Limited refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the Complaints section below.

Right to withdraw consent

If you have provided us with consent to us processing your personal information you have the right to withdraw your consent for processing for that purpose at any time. To exercise these rights please contact us using the contact details set out in the Contact Information section below.

On what basis do we process personal data?

We will only process personal data where we have a lawful basis on which to do so. The lawful basis on which data is processed will depend on the nature of the information collected and the purposes for which it is used by us but will be one or more of following:

- **Consent:** you have provided your consent for us to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with us or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for us to comply with our legal obligations, in the safeguarding against and the prevention of threats to public security, as specified in the Law Enforcement Directive.
- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party.

For how long do we hold personal data?

PPM Limited will only retain personal information for as long as directed by the relevant Data Controller which is typically the end of our contract. Where we are the Data Controller we will only retain personal information for the period necessary to fulfil the purposes for which it is collected and processed, or for such shorter or longer period as may be prescribed by applicable law or PPM Limited's internal policies and procedures.

Further information on our retention policy can be requested by contacting us via the information provided in the Contact Information section below.

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Disclosure of your information

We may also disclose your personal information to third parties in certain circumstances including:

- We may provide personal data to clients, third party suppliers, service providers, professional advisors and other business partners to enable us to provide or receive products or services.
- In connection with the administration and operation of our business we may provide personal data to third parties who provide support services including IT, finance and accounting, business development and consultancy services.
- In the event that we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets.
- We may disclose or share your personal data if we are under a duty to do so in order to comply with any legal obligation or where necessary to enforce any legal right or contractual agreement, or to protect the rights, property, or safety of Partnering in Property Management, our employees, customers, or others. This includes exchanging information with other companies, organisations and bodies for the purposes of fraud protection and credit risk reduction.

We want to inform our Service users that these third parties have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

Changes to our Privacy Notice

This Privacy Notice was last updated in May 2018. Any changes we may make to our Privacy Notice in the future will be posted on this page and we suggest that you check back frequently to see any updates or changes.

Contact information

Our Data Protection Officer, Beth Nicholls, is responsible for the management of personal data within PPM Limited and for ensuring that compliance with data protection legislation and good practice can be demonstrated. Questions, comments and requests regarding this Privacy Notice or our collection or use of personal data should be addressed to:

The Data Protection Officer

PPM Limited

Atlantic House

Fletcher Way

Carlisle

Cumbria

CA3 0LJ

Email: communications@ppm-limited.co.uk

Complaints

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If you wish to make a complaint about how your personal data is being processed by us (or the third parties referred to in this Privacy Notice), or how your complaint has been handled, you have a right to lodge a complaint with our Data Protection Officer using the contact details above or by contacting:

The Information Commissioners Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Email: casework@ico.org.uk