



Burnett Davies Lettings (**the Company**) is committed to protecting the privacy of your personal information. For the purpose of applicable data protection law, including the Data Protection Act 1998 and, from its entry into force on 25 May 2018, the General Data Protection Regulation (Regulation (EU) 2016/679). Our Privacy Notice explains what we do with any personal information which we collect from you, including when you use our website and when you interact with us in other ways offline, for example during the credit application process. If you have any questions regarding our Privacy Notice, please contact us at the address on the **Contact Us page** of this site.

This Privacy Notice explains how we collect, use and disclose personal information about you when you visit the site and when you contact us, whether by e-mail, post, fax or telephone using the contact options on the site. The information you provide to us may then be shared with other companies in respect of referencing you to rent a property through us.

What type of personal information do we collect?

The personal information we collect from you is used primarily to enable us to provide the specific service you require and to help you access your account, securely.

Personal information can include the following:

- your title, forename and surname and gender;
- your personal or work related (depending on which you choose to submit) e-mail address and your password (which allow us to create your user account and your unique agreement number);
- your personal or work related contact details (depending on which you choose to submit) such as your telephone number(s), fax numbers and postal address;
- your date of birth and national insurance number;
- your marital status;
- your residential status and address details for the last 3 years;
- occupation, salary and annual income information;
- employment status;
- employer details and time periods in that occupation and with that employer and any other employers within a 3 year period;
- your bank details, including your bank name and address, sort code, account number, account type and time period at your bank;
- personal information which we obtain from Fraud Prevention Agencies (see the section on 'Fraud Prevention Agencies' below);
- personal information about your credit history which we obtain from Credit Reference Agencies including data which originates from Royal Mail (UK postal addresses), local authorities (electoral roll), the insolvency service, Companies' House, other lenders and providers of credit (who supply data to the CRAs), court judgments decrees and administration orders made publicly available through statutory public registers (see the section on 'Credit Reference Agencies' below);
- information necessary for legal compliance; and/or
- where you "like" us or make posts on our pages on social networking websites, such as Facebook, Twitter, YouTube and Instagram.

This information will be collected primarily from you as information voluntarily provided to us, but (as explained above) we may also collect it where lawful to do so from (and combine it with information from) credit reference and fraud prevention agencies, public sources, third party service providers (such as Paragon who will conduct a credit search as part of our “Check my Eligibility” service), tax or law enforcement agencies and other third parties. Also, some of the personal information obtained from Credit Reference Agencies will have originated from publicly accessible sources. In particular, Credit Reference Agencies draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll). We may also collect personal information about you from your use of other Company or Group websites or services.

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- your residential status and address details for the last 3 years;
- occupation, salary and annual income information;
- employment status;
- employer details and time periods in that occupation and with that employer and any other employers within a 3 year period;
- your bank details, including your bank name and address, sort code, account number, account type and time period at your bank;
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- personal information about your credit history which we obtain from Credit Reference Agencies including data which originates from Royal Mail (UK postal addresses), local authorities (electoral roll), the insolvency service, Companies’ House, other lenders and providers of credit (who supply data to the CRAs), court judgments decrees and administration orders made publicly available through statutory public registers (see the section on ‘Credit Reference Agencies’ below);
- your contact and marketing preferences;
- if you take a survey or interact with us in various other ways - demographics information and information about subjects that may interest you;
- information necessary for legal compliance; and/or
- where you "like" us or make posts on our pages on social networking websites, such as Facebook, Twitter, YouTube and Instagram.

Personal information also includes special categories of personal data. This is data about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, and data concerning your health, sex life or sexual orientation. In the unlikely event that any of this is collected from you during your use of the website or during any other offline interaction with us you may be asked at the point of collection to provide your explicit consent where needed in order to justify our processing of it.

This information will be collected primarily from you as information voluntarily provided to us, but (as explained above) we may also collect it where lawful to do so from (and combine it with information from) credit reference and fraud prevention agencies, public sources, third party service providers (such as Experian Limited trading as HD Decisions who will conduct a soft credit search as part of our “Check my Eligibility” service), tax or law enforcement agencies and other third parties. Also, some of the personal

information obtained from Credit Reference Agencies will have originated from publicly accessible sources. In particular, Credit Reference Agencies draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll). We explain more about Credit Reference Agencies below. We have also mentioned above in the lists of personal information that we process some of the CRAs' other sources of information (which are our own source of information too). We may also collect personal information about you from your use of other Company or Group websites or services.

The legal basis for our use and other processing of your personal information under DP Law

This will include (as relevant):

- processing your personal information so that we may perform our obligations under a contract with you (such as a letting agreement with you) (“**Your Contract**”);
- Processing for legitimate interests provided these are not overridden by your interests and fundamental rights and freedoms (this includes our own legitimate interests and those of other entities and branches in our group of companies). For example, this is relevant when we use and process your personal data to deal with our legal and regulatory and internal governance obligations; and in addition / together with the processing condition described above (“**Legitimate Interests**”),
- Processing which is necessary for compliance with our legal obligations laid down by European Union law (where relevant) and by English Laws applicable to us in the United Kingdom (“**Our Legal Obligations**”).
- Your consent may also be a lawful reason for processing your personal data in certain cases (“**Your Consent**”). This means you're freely given, specific, informed and unambiguous consent which may be collected from you, for instance: when you sign the application form this is you giving your consent. You should be aware that you are entitled under DP Law to withdraw your consent where you have given it to us at any time. If you do this and if there is no alternative lawful reason for us to rely on to justify our use or other processing on your personal data, this may affect our ability to provide you with some of our services.

In summary, we need certain categories of personal data in order to provide you with our services. Certain other personal data is processed for our Legitimate Interests in cases where this does not result in prejudice to you. Certain other personal data is processed based on consent.

Your personal data will not be kept for longer than is necessary to fulfil the specific purposes outlined in this Notice and to allow us to comply with our legal requirements.

The criteria we use to determine data retention periods include the following:

- (i) **Retention in case of queries.** We may retain it for a reasonable period (up to 6 months) after you have enquired about one of our products or services in case of follow up queries from you;
- (ii) **Retention in case of claims.** We may retain it for the period in which you might legally bring claims against us (in the UK this means we will retain it for 6 years) if and to the extent this is relevant; and
- (iii) **Retention in accordance with legal and regulatory requirements.** We will consider whether we need to retain your personal data after the period described in (ii) (above) because of a legal or regulatory requirement. Some or all of these criteria may be relevant to retention of your personal data collected in connection with our products and services.

Your rights under DP Law

[As well as the right to access the personal information we hold about you, you have a number of other rights in respect of your personal information under DP Law. These may include (as relevant):

- the right to access or obtain copies of your personal information that we hold (see above);
- the right to rectification, including to require us to correct inaccurate personal data;
- the right to request restriction of processing concerning you or to object to processing of your personal data;
- the right to request the erasure of your personal data where it is no longer necessary for us to retain it;
- the right to data portability including to obtain personal data in a commonly used machine readable format in certain circumstances such as where our processing of it is based on your consent;
- the right to object to automated decision making including profiling (if any) that has a legal or significant effect on you as an individual; and
- where you have an option to provide us with your personal data or not in connection with your use of our website or in connection with any of our products or services, you have the right to be informed about the possible consequences of not giving it to us;
- the right to withdraw your consent to any processing for which you have previously given that consent.

Please be aware that some of these rights will only become relevant when changes to DP Law come into force in May 2018.

Please contact us at martyn@burnettdavieslettings.co.uk if you would like to exercise any of your rights explained above in relation to your personal information.

Your right to complain to the data privacy supervisory authority

Without prejudice to any other administrative or judicial remedy you might have, you have the right to lodge a complaint with the UK's Information Commissioner if you consider that we have infringed applicable data privacy laws when processing your personal data. In the **UK** the Information Commissioner's Office can be contacted using the following link: <https://ico.org.uk/>.