

Way of Life.

GDPR PRIVACY NOTICE

Version 2 – June 2019

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INTRODUCTION AND BACKGROUND

The purpose of this policy is to outline how Way of Life Management Limited has established measures to protect your privacy and information rights.

YOUR RIGHTS

We recognise that you have rights as a ‘data subject’, and that we have an obligation to uphold these.

This privacy notice aims to outline how we maintain these rights. In particular, it outlines:

- How we collect and process your information
- Why we do this
- How you can exercise your rights;
- Who to contact in the event you’re unhappy with our performance.

In various circumstances, your rights are as follows:

Right	Explanation
Right to be informed	This encompasses the obligation for us to be transparent in how we collect and use your personal data.
Right of access	You have the right to access your personal data and supplementary information.
Right to rectification	If the information we hold about you is inaccurate or incomplete, you can request that we correct this.
Right to erasure	You can request that we delete or remove personal data where there is no compelling reason for us to continue processing
Right to restrict processing	You have the right to request that we cease processing your data, if: <ul style="list-style-type: none"> • you consider it inaccurate or incomplete;

	<ul style="list-style-type: none"> • you object to processing and we are considering whether we still have a legitimate interest to process it.
Right to data portability	<ul style="list-style-type: none"> • Where you have consented to our processing your data, or where the processing is necessary for us to deliver a contract, you can request a copy of that data be provided to a third party in electronic form.
Right to object	<p>You have the right to object to our processing under certain circumstances. For example, you can object to:</p> <ul style="list-style-type: none"> • direct marketing (including profiling); and • processing for purposes of scientific/historical research and statistics
Rights relating to automated decision making including profiling	<p>Where we apply automated decision making, we must</p> <ul style="list-style-type: none"> • give you information about the processing; • introduce simple ways for you to request human intervention or challenge a decision; • carry out regular checks to make sure that our systems are working as intended <p>Information related to automated decision making is contained later in this notice.</p>

This privacy notice outlines how we are transparent in our processing. Please get in touch with us through the ‘contact details’ section to find out more or to exercise your information rights. There are circumstances in which we will decline your request, but we will explain this clearly to you.

INFORMATION WE COLLECT

Please find below a summary of the information we process and how we use this to deliver services to you.

PRIVACY NOTICE

Information we collect	Why we collect this	How we process this
Core tenant records	Our basis for processing this information is that it is necessary for us to deliver the services that you have contracted to.	We use this information to administer and process billing. We will retain some billing history as a part of our corporate records, and will record our correspondence with you. We may also share this information with third parties that can provide maintenance to your property.
Tenant correspondence	Our basis for processing this information is that it is necessary for us to deliver the services that you have contracted to.	We use this information to administer and process billing. We will retain some billing history as a part of our corporate records, and will record our correspondence with you. We may also share this information with third parties that can provide maintenance to your property.
Tenant billing	Our basis for processing this information is that it is necessary for us to deliver the services that you have contracted to.	We use this information to administer and process billing. We will retain some billing history as a part of our corporate records, and will record our correspondence with you.

		We may also share this information with third parties that can provide maintenance to your property.
Tenant documentation (hardcopy)	Our basis for processing this information is that it is necessary for us to deliver the services that you have contracted to.	We use this information to administer and process billing. We will retain some billing history as a part of our corporate records, and will record our correspondence with you. We may also share this information with third parties that can provide maintenance to your property.
Finance	We process this information on our employees to allow us to administer their employment and benefits.	We process this information as one would expect of a responsible employer – to pay salaries, administer benefits, manage our obligations as an employer.
Payroll	We process this information on our employees to allow us to administer their employment and benefits.	We process this information as one would expect of a responsible employer – to pay salaries, administer benefits, manage our obligations as an employer.

Business administration (electronic file and document storage)	We process this information on our employees to allow us to administer their employment and benefits.	We process this information as one would expect of a responsible employer – to pay salaries, administer benefits, manage our obligations as an employer.
Human Resources	We process this information on our employees to allow us to administer their employment and benefits.	We process this information as one would expect of a responsible employer – to pay salaries, administer benefits, manage our obligations as an employer.
Management agent	Our basis for processing this information is that it is necessary for us to deliver the services that you have contracted to.	We sometimes need to share information with the managing agent for the property.
Prospective client and non-clients’ data	We process this data by consent which is obtained when a positive “sign-up” is initiated.	We only use this data to distribute newsletters and similar as requested by the data subject.

TRANSFER OF DATA

We share data with a number of third parties in the course of delivering our services. These are summarised below:

- Our IT service provider, ReflectiveIT, provides offsite backup services for us.

- Cleardata and Neopost help with scanning and printing documentation we send and receive. This allows us to make sure that our primary internal records are electronic.
- Moore Stephens LLP are our auditors and operate payroll on our behalf.
- PeopleHR provides us a cloud-based HR management system, to help us administer employee records.
- We can share information with other members of the Long Harbour group to support us in day-to-day business administration.
- We use the Office 365 suite provided by Microsoft to handle our email and other office automation.

RETENTION OF DATA

Way of Life Management Limited retains information for seven (7) years from our point of last contact. We hold this information to support our legal and regulatory requirements. If you object to this retention, please contact us – details provided in the ‘Contact’ section.

AUTOMATED DECISION MAKING

Way of Life Management Limited does not routinely make use of automated decision making or profiling in processing your data.

SECURING YOUR INFORMATION

Way of Life Management Limited applies technical and organisational security measures in line with industry good practices such as ISO 27001. Way of Life Management Limited has achieved the Cyber Essentials accreditation.

CONTACT DETAILS

We recognise that you may have questions on how we process and/or store your data, or may want to change either the data we hold on you or how we communicate with you in the future.

If you have any questions in respect of this notice, or would like to exercise your rights as a data subject (for example, to correct data or to exercise your right to access):

- Way of Life Management Limited, as data controller, can be contacted as follows: 33, Wigmore Street, London W1U 1QX
- The Data Protection Officer can be contacted at the above address or email at dpo@wayoflife.com

If you are unhappy that we have responded to your query adequately, or if you have a further complaint, The Information Commissioner's Office can be contacted via <https://ico.org.uk/global/contact-us/...> Or by email accessicoinformation@ico.org.uk

Post: Information Governance department. Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow. Cheshire SK9 5AF