

Introduction

Residential Management Group Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy at www.rmquk.com/cookie-policy. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

Residential Management Group Limited is part of the Places for People Group, one of the largest property and leisure management organisations in the UK. Places for People provides customers with a wide range of products and services, including leisure centre and gym memberships, affordable finance products and retirement services to name just a few. We would like to occasionally send you marketing information on products and services that we think will be of interest to you and we will ask for your consent to do this. We promise to treat your contact details with the utmost care, and to never pass them to companies outside of the Places for People Group.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Residential Management Group Limited (“RMG”) collects and processes your personal data through your use of this website, including any data you may provide through this website.

This website is not intended for children and we do not knowingly collect data relating to children.

RMG is a residential managing agent. RMG acts for and on behalf of its clients. If you are an existing customer of RMG you will have a contractual relationship with one of our clients. Your personal data will be processed by RMG in accordance with that client’s privacy policy. RMG will be acting as data processor in

those circumstances. If you are a customer of RMG and you wish to obtain a copy of the privacy policy that applies to that processing then please contact: CentralCompliance@rmguk.com setting out your name and the property you own.

If you are not an existing customer of RMG then it is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Residential Management Group Limited is the controller and responsible for your personal data (collectively referred to as "RMG", "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Compliance Director using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Residential Management Group Limited (CRN: 01513643)

Name or title of data privacy manager: Richard Price, Compliance Director

Email address: CentralCompliance@rmguk.com

Postal address: RMG House, Essex Road, Hoddesdon, EN11 0DR

Telephone number: 0345 002 4444

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25 May 2018 and previous versions can be obtained by contacting us.

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

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - subscribe to our service;
 - request marketing to be sent to you;
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit

other websites employing our cookies. Please see our cookie policy www.rmquk.com/cookie-policy for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data.

Marketing

We do not use your personal data for marketing purposes except in a business to business context where we have assessed it is necessary for our legitimate interests and it does not impact on your fundamental rights and freedoms.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see www.rmquk.com/cookie-policy change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with:

- other companies in the Places for People Group and who are based in the United Kingdom and provide IT and system administration services and undertake leadership reporting.
- Service providers acting as processors based in the EEA who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators, professional bodies and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes

and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

7. Data security

We store personal information both electronically and in paper form.

We implement security policies, processes and technical security solutions to protect the personal information we hold from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

We'll do what we can to make sure we hold records about you (on paper and electronically) in a secure way, and we'll only make them available to those who have a right to see them. Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what's called a 'cypher'. The hidden information is said to then be 'encrypted'
- Pseudonymisation, meaning that we'll use a different name so we can hide parts of your personal information from view. This means that someone outside of RMG could work on your information for us without ever knowing it was yours
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it
- Training for our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates (commonly called patches)

When you contact us, we may ask you to provide us with some information so that we can confirm your identity. If other people (e.g. family members, support workers, solicitors) act on your behalf we will take steps to ensure that you have agreed for them to do so. This may include asking them to provide us with supporting information to indicate your consent. We do this to protect you and to make sure that other people cannot find things out about you that they are not entitled to know.

Employees and third parties who have access to, or are associated with the processing of, your personal information are obliged to make reasonable efforts to safeguard it.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us CentralCompliance@rmquk.com.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

The law gives you a number of rights to control what personal information is used by us and how it is used by us.

You can ask for access to the information we hold on you

You have the right to ask for the information we have about you. When we receive a request from you in writing, we must give you access to what personal information we've recorded about you.

However, we can't let you see any parts of a record which contain:

- Confidential information about other people; or
- May be held in preparation to defend legal claims

This applies to personal information that is in both paper and electronic records. If you ask us, we'll also let others see your record (except if one of the points above applies).

A request for personal information can be made via email or in writing. This is known as a subject access request. In order to make a subject access request you will need to provide the following information:

- your name
- your address
- proof of identity and signature
- enough information to identify your records

What types of documents could I submit as proof of ID?

- Copy passport with signature (please remove your passport number)
- Copy driving license picture with signature (please remove your driver number)
- Copy of signed tenancy or contract with us

We will not start your subject access request until we are satisfied that you have provided us with enough information for us to identify you.

Once you have made a request you will receive an acknowledgement and your request should be answered within one month. In certain circumstances, we are allowed to take longer but we will tell you if we feel we may need longer without undue delay from when we receive your request.

If you can't ask for your records in writing, we'll make sure there are other ways that you can. If you have any queries about access to your information please contact 0345 002 4444.

You can ask to change information you think is inaccurate

You should let us know if you disagree with something we may have recorded about you.

We may not always be able to change or remove that information but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

You can ask to delete information (right to erasure)

In some circumstances you can ask for your personal information to be deleted, for example:

- Where your personal information is no longer needed for the reason why it was collected in the first place
- Where you have removed your consent for us to use your information (where there is no other legal reason us to use it)
- Where there is no legal reason for the use of your information
- Where deleting the information is a legal requirement

Where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for erasure.

Please note that we can't delete your information where:

- we're required to have it by law
- it is for historical research, or statistical purposes where it would make information unusable
- it is necessary for legal claims

You can ask to limit what we use your personal data for

You have the right to ask us to restrict what we use your personal information for where:

- you have identified inaccurate personal information, and have told us of it

- where we have no legal reason to use that information but you want us to restrict what we use it for rather than erase the information altogether

We will assess whether you have a right to a restriction and where restriction of use has been granted, we'll inform you before we carry on using your personal information.

Where possible we'll seek to comply with your request, but we may need to hold or use information because we are required to by law or we have a legal basis to do so, such as a contract.

You can ask to have your information moved to another provider (data portability)

You have the right to ask for your personal information to be given back to you or another service provider of your choice in a commonly used format. This is called data portability.

However this only applies if we're using your personal information with consent (not where we are processing your personal information for contractual, legitimate interests, legal obligations or vital interests as a legal basis) and if decisions were made by a computer and not a human being.

It's likely that data portability won't apply to most of the services you receive from RMG

Right to understand Automated Decisions made about you

You can ask to have any computer made decisions explained to you, and details of how we may have 'risk profiled' you.

You have the right to question decisions made about you by a computer, unless it's required for any contract you have entered into, required by law, or you've consented to it.

You also have the right to object if you are being 'profiled'. Profiling is where decisions are made about you based on certain things in your personal information, e.g. your health.

If and when your personal information is used to profile you, in order to deliver the most appropriate service to you, you will be informed.

If you have concerns regarding automated decision making, or profiling, please contact the Compliance Director at CentralCompliance@rmguk.com who'll be able to advise you about how we are using your information.

In order to pursue any of the above data rights you can write to us at the following address:

Central Compliance
Residential Management Group Limited
RMG House
Essex Road
Hoddesdon
EN11 0DR

Alternatively email us at CentralCompliance@rmguk.com. (Please ensure you attach your identity documents with the document reference numbers removed).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.