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**Fair Processing Notice**

**(Created May 2018)**

This notice explains what information we collect, when **we** collect it and how **we** use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

**Who are we?**

Clarity Home Solutions Ltd (including the letting arm trading under the name HMO Tranquillity) (“**I**”/ “**we**” or “**me**”/ “**us**”) take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number **ZA158397** and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Anne Woodward.

Any questions relating to this notice and our privacy practices should be sent to Anne Woodward at anne@clarityhomesolutions.co.uk.

**Tenant Clients**

**How we collect information from you and what information we collect**

We collect information about you:

* From your interest in and application for accommodation
* From any other forms completed and information provided with regard to your tenancy
* From your interest in and application for our property management services
* From any other forms and information provided with regard to the management of your property

We collect some or all of the following information about you:

* Tenant name, e-mail address, telephone number Date of Birth, address (including any previous addresses), marital status, National Insurance Number, nationality, next of kin, name of university or college where you are studying (if applicable), the name of friends that you are staying with (if applicable);
* Guarantor name, e-mail address, telephone number, Date of Birth, address (including any previous addresses), marital status, National Insurance Number, nationality, next of kin (if applicable);
* Property address; term, rent, deposit, utility and service responsibilities;
* The employment status of tenants and/or guarantors, address, contact details (including email, phone and fax numbers) of the employer/accountant, payroll numbers, length of employment, salary information (including any regular overtime or commission), and any other income received;
* Bank account details of the tenant, including account number and sort code, and any hire purchase/loan agreements/credit cards or store cards that you have; and
* Any welfare benefits that you may be eligible for, or are currently on.

**Owner Clients**

**How we collect information from you and what information we collect**

We collect information about you:

* From your interest in and application for our property management services
* From any other forms and information provided with regard to the management of your property

We collect some or all of the following information about you:

* Name, e-mail address, telephone number, National Insurance Number, nationality,
* Property address; utility and service information;
* Bank account details, including account number and sort code

**Why we need this information about you and how it will be used**

We need your information and will use your information:

* to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
* to enable us to supply you with the services and information which you have requested;
* to help manage your property or your tenancy;
* to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
* to contact you in order to send you details of any changes to our business or supplies which may affect you; and
* for all other purposes consistent with the proper performance of our operations and business.

**Sharing of Your Information**

The information you provide to us will be treated as confidential. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

* If we enter into a joint venture with or merged with a business entity, your information may be disclosed to our new business partners or owners;
* To carry out due diligence on you as a prospective owner / tenant / guarantor, including but not limited to the carrying out of ownership details, affordability checks, due diligence checks and the obtaining of references from relevant parties, whose data you have provided;
* If you agree, your information shall be disclosed in order to determine if there are any money judgements against you, as the prospective tenant/guarantor, or to determine if they have a history of bankruptcy or insolvency (note that failure to agree could mean that we are unable to proceed with a tenancy for you);
* If you are unable to make payments due to us, your information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you;
* In setting up a management agreement with you and continuing to process it, your information will be disclosed to the relevant local authority, tenant deposit scheme administrator, or any other relevant person or organisation where there is a legal requirement to do so; and
* In the creation, renewal or termination of a tenancy, your information will be disclosed to the relevant local authority, tenancy deposit scheme administrator, service/utility provider, freeholder, facilities manager or any other relevant person or organisation in connection with this.

Your information is uploaded to tools used for the effective management of your application and tenancy. These include:

* Arthur Property Management software
* GoTenant Property Management software
* Formsite
* MyDeposits
* Signable
* NLA Tenant Check
* Xero

The above organisations have confirmed that they do not process any of the data received as a result of my use of the systems. This confirmation can be requested from [anne@clarityhomesolutions.co.uk](mailto:anne@clarityhomesolutions.co.uk).

In addition, we may pass your contact details to contractors and handymen should they require access to your individual room in the course of their duties when we are not available to accompany them. You will be contacted to gain agreement to this.

Our main form of communication within the houses is via WhatsApp. You will be asked to consent to allowing us to add you to the house WhatsApp group. The group members will include all current tenants, the property manager and the tenant relationship co-ordinators. It may also include fellow property managers who are covering holiday periods.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent. We do not pass your information on to marketing or processing companies.

**Transfers outside the UK and Europe**

Your information will only be stored within the UK and EEA on our systems. Our applications process uses Formsite, a company based in USA. They hold the information securely but do not process it.

Where information is transferred outside the UK or EEA, I/we ensure that there are adequate safeguards in place to protect your information in accordance with this notice.

**Security**

When you give us information we take steps to make sure that your personal information is kept secure and safe.

All information is stored on an encrypted laptop. Backups are stored on an encrypted external drive which is kept in a locked fire safe. Paper records are not kept. Should paper documents exist, they will be shredded once the information has been uploaded or scanned as appropriate.

Information stored on the tools used to support the management of your tenancy (as named above) is held securely according to their data protection policies, which are available on request.

**How long we will keep your information**

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

We store personal information for 2 years from the last date of your tenancy or from the end of your property management agreement, and financial information for 7 years from the date of the last financial transaction with you, unless we are in the process of recovering monies owed.

**Your Rights**

You have the right at any time to:

* ask for a copy of the information about you held by us in our records;
* require us to correct any inaccuracies in your information;
* make a request to us to delete what personal data of yours we hold (unless we are required to hold it for legal purposes for a certain period of time); and
* object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at anne@clarityhomesolutions.co.uk

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the Information Commissioner’s Office in relation to our use of your information. The Information Commissioner’s contact details are noted below:

**England:**

Information Commissioner's Office

Wycliffe House, Water Lane

Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

**Scotland:**

The Information Commissioner’s Office – Scotland

45 Melville Street, Edinburgh, EH3 7HL

Telephone: 0131 244 9001

Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)

**Wales:**

Information Commissioner's Office

2nd floor, Churchill House

Churchill way, Cardiff, CF10 2HH

Telephone: 029 2067 8400

Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

**Northern Ireland:**

Information Commissioner's Office

3rd Floor, 14 Cromac Place

Belfast, BT7 2JB

Telephone: 028 9027 8757

Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.