

Privacy & Data Protection Policy

Simple Propco Ltd — trading as PICS Professional

This document sets out our policies and procedures relating to privacy and data protection. Please read it carefully and make sure you understand it. If anything is unclear, or you would like this policy in another format, please contact us using the details below.

Who we are

- **Company:** Simple Propco Ltd, trading as PICS Professional ("we", "us", "our")
- **Company registration number:** 15337761 (registered in England and Wales)
- **Registered office:** Office 2, 105 High Street, Evesham WR11 4EB
- **Telephone:** 01386 339900
- **Email:** hello@picsprofessional.co.uk
- **VAT number:** GB 456 062 593
- **Website:** www.picsprofessional.co.uk

We are the "data controller" for the personal data described in this policy. This means we are responsible for deciding how and why your personal data is used, and for keeping it safe. For any question about this policy or about how we handle your personal data, please contact us using the details above, marking your message for the attention of the person responsible for data protection.

Privacy Policy

Scope

We respect and value the privacy of everyone we deal with, including visitors to our website www.picsprofessional.co.uk ("our site") and everyone whose personal data we handle in the course of our property management and related services. We only collect and use personal data as described in this policy and as permitted by law.

Our site may contain links to other websites. This policy applies only to our site and our services. We do not control other websites and are not responsible for their privacy practices, so we recommend you check the privacy policy of any other website you visit.

The personal data we collect

Depending on your relationship with us, we may collect and use the following categories of personal data:

- **Identity and contact details** — name, postal address, email address, telephone number and similar contact information.
 - **Property, tenancy and leaseholder information** — the property or properties you own, lease, occupy or manage; tenancy or lease details; and related correspondence and records.
 - **Financial information** — bank or payment details, and records of rent, service charges, ground rent, arrears and transactions needed to administer payments and client accounts.
 - **Correspondence and records of contact** — emails, letters, notes of calls and meetings, complaints, and maintenance or repair requests.
 - **Identification and compliance information** — where required by law, information needed for identity checks, anti-money-laundering checks, and right-to-rent or similar statutory checks.
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- **Website and technical data** — when you use our site we automatically collect limited technical information such as your IP address, browser type and version and operating system, and (where you consent) information collected through cookies and similar technologies.
- **Special category data** — we do not routinely collect sensitive personal data. Where we do (for example health information relevant to a reasonable-adjustment request), we will only do so where the law allows and we will tell you why.

We may obtain personal data directly from you, and also from third parties such as landlords, freeholders, residents' management companies, other agents, your representatives, and publicly available sources (for example HM Land Registry).

Why we use your personal data and our lawful basis

Under the UK GDPR we must have a "lawful basis" for using your personal data. The bases we rely on are set out below.

Purpose	Our lawful basis
Providing property management and related services and administering agreements	Performance of a contract (Article 6(1)(b)); or our legitimate interests where you are not the contracting party (Article 6(1)(f))
Collecting, holding and accounting for rent, service charges and other client money	Performance of a contract; legal obligation (Article 6(1)(c)); and our legitimate interests
Carrying out identity, anti-money-laundering and other statutory checks	Compliance with a legal obligation (Article 6(1)(c))
Responding to your enquiries, correspondence and complaints, including data protection complaints	Compliance with a legal obligation (Article 6(1)(c)); and our legitimate interests (Article 6(1)(f)) in running our business and responding to those who contact us
Sending service messages and information relevant to your property	Performance of a contract and/or our legitimate interests
Sending marketing where you have asked to receive it	Your consent (Article 6(1)(a)), which you can withdraw at any time
Keeping proper business records and establishing, exercising or defending legal claims	Compliance with a legal obligation and our legitimate interests
Maintaining the security and proper functioning of our site	Our legitimate interests in keeping our systems secure

Where we rely on legitimate interests, we have considered whether those interests are overridden by your interests or rights, and you can ask us for more information about this. Where we rely on your consent, you are free to withdraw it at any time.

Marketing

We will only send you marketing where we are permitted to do so. You can ask us to stop at any time by contacting us or by using the unsubscribe option in any marketing email. Withdrawing consent does not affect any processing carried out before you withdrew it.

Cookies and similar technologies

Our site uses cookies and similar technologies. Some are strictly necessary for the site to work; others (for example analytics) are only used with your consent, which you can give or refuse through our cookie banner and change at any time. We handle cookies in line with the Privacy and Electronic Communications Regulations and the UK GDPR, including the changes introduced by the Data (Use and Access) Act 2025. For details of the cookies we use and how to manage them, please see the cookie information on our site.

How long we keep your personal data

We keep personal data only for as long as is necessary for the purposes for which it was collected, including to meet legal, accounting, regulatory or reporting requirements. When deciding how long to keep data we consider the amount and sensitivity of the data, the potential risk of harm from unauthorised use, the purposes for which we process it, and whether we can achieve those purposes by other means. When data is no longer needed we securely delete or anonymise it. We can provide further detail about retention periods for a particular type of data on request.

Keeping your data secure

We use appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage. We limit access to those who need it, and we have procedures to deal with any suspected data breach, including notifying the Information Commissioner's Office and affected individuals where we are required to do so.

Storing and transferring your data

We store personal data in the UK wherever possible. Some of the service providers we use (for example IT and software providers) may store data in the European Economic Area or elsewhere. Where personal data is transferred outside the UK, we make sure an appropriate safeguard is in place — for example that the destination is covered by UK "adequacy" regulations, or that an approved transfer mechanism (such as the International Data Transfer Agreement, or the UK Addendum to the EU Standard Contractual Clauses) is used — so that your data continues to be protected to UK standards.

Sharing your personal data

We do not sell your personal data. We may share it with:

- Service providers who process data on our behalf (for example IT, software, hosting, accounting, document storage and communications providers), under contracts that require them to keep it secure and use it only as instructed;
- Other parties involved in managing your property where necessary, such as landlords, freeholders, residents' management companies, contractors, surveyors, solicitors and other professional advisers;
- Banks, payment providers and auditors in connection with client money and accounting;
- Regulators, government bodies, law enforcement, courts and others where we are required or permitted by law to do so, including in connection with legal proceedings, a court order, or a request from a public authority; and
- A buyer or successor if we sell, transfer or reorganise our business or assets, in which case any new owner may continue to use your personal data as set out in this policy.

Where we use a processor to act on our behalf, our agreement with them covers how data protection complaints are handled, including passing any complaint they receive to us and giving us the information we need to investigate it. The responsibility for handling your complaint remains with us.

Children's data

Our services and site are not directed at children, and we do not knowingly collect children's personal data except where it is necessary in the course of managing a property (for example as part of household information provided to us). Where we do, we handle it with particular care. Children have the same rights over their personal data as adults, including the right to complain to us, and we will respond to a child in plain language they can understand.

Automated decision-making

We do not make decisions about you based solely on automated processing (including profiling) that produce legal or similarly significant effects.

Data Protection Policy

What personal data is

Personal data is defined by the UK GDPR and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025 (together, "the Data Protection Legislation"), as any information relating to an identified or identifiable living individual. In simpler terms, it is any information that allows you to be identified, directly or indirectly. It includes obvious information such as your name and contact details, and less obvious information such as identification numbers, financial records, location data and online identifiers.

Our commitment

We are committed to complying with the Data Protection Legislation and with the data protection requirements of the professional bodies and redress scheme whose standards we follow. In handling personal data we will process it lawfully, fairly and transparently; collect it only for specified, explicit and legitimate purposes; collect only what is adequate, relevant and necessary; keep it accurate and up to date; keep it no longer than necessary; and keep it secure.

We are also committed to dealing openly with anyone who is unhappy about how we have handled their personal data. We maintain a data protection complaints process, described below, and we train our staff so that they can recognise a data protection complaint and know what to do with it.

Your rights

Under the Data Protection Legislation you have the following rights, which we will always work to uphold:

- **The right to be informed** about how we collect and use your personal data.
- **The right of access** — to ask for a copy of the personal data we hold about you (a "subject access request").
- **The right to rectification** — to have inaccurate or incomplete data corrected.
- **The right to erasure** — to ask us to delete your personal data in certain circumstances.
- **The right to restrict processing** — to ask us to limit how we use your data in certain circumstances.
- **The right to object** — to processing based on our legitimate interests, and to direct marketing at any time.
- **The right to data portability** — to ask for certain data to be provided to you or another organisation in a structured, commonly used, machine-readable format.
- **The right to withdraw consent** at any time where we rely on consent.
- **The right to complain** — to complain to us about how we have collected or used your personal data, and to complain to the Information Commissioner's Office. See below.
- **Rights relating to automated decision-making and profiling** (see the Privacy Policy above).

How to exercise your rights

To exercise any of these rights, please contact us using the details at the top of this policy. We will respond within the time limits set by law (usually within one month). There is normally no charge. We may need to verify your identity before we act on your request. It helps us to keep your data accurate if you tell us when your details change.

Whenever we respond to a subject access request, we will also tell you about your right to complain to us and to the Information Commissioner's Office.

Your right to complain to us about data protection

You have the right to complain to us about how we have collected or used your personal data. Since 19 June 2026, the Data (Use and Access) Act 2025 has required every organisation to have a process for handling data protection complaints. This is our process.



A data protection complaint is different from a complaint about the standard of our service. Service complaints are dealt with under our separate Complaints Policy and, if unresolved, can be referred to The Property Redress Scheme. Data protection complaints follow the same internal stages, but the independent route is the Information Commissioner's Office.

How to complain. You can raise a data protection complaint in whatever way suits you — by email to hello@picsprofessional.co.uk, by telephone on 01386 339900, by post to Office 2, 105 High Street, Evesham WR11 4EB, or in person. You do not have to use a particular form or channel, and you do not have to use the words "data protection" or "complaint". If you tell any member of our team that you are unhappy about how we have handled your personal data, we will treat that as a data protection complaint and pass it to the person responsible for data protection.

What we will do.

1. **Acknowledge** — we will acknowledge your complaint within 30 days of receiving it, and in practice within 3 working days.
2. **Investigate without undue delay** — our investigation begins when we receive your complaint, not when we acknowledge it.
3. **Keep you informed** — we will keep you updated on progress, give you a point of contact, and explain any delay.
4. **Tell you the outcome** — we will explain what we found, respond to the points you raised, explain how we reached our conclusion, and tell you about any changes we have made as a result.

If you are not satisfied with the outcome, you can ask us to review it. You can also complain to the Information Commissioner's Office — you do not have to wait for our review, and you do not have to use our process at all, before doing so. Our Complaints Policy sets out the full procedure, including what we do about proof of identity, complaints made on someone else's behalf, and complaints received through social media.

Complaints to the regulator

You have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator, at any time. We would like the chance to put things right first, and raising the matter with us often resolves it more quickly — but that is your choice, not a condition, and you do not need our permission or a final response from us before going to the ICO.

- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- Helpline: 0303 123 1113
- Website: www.ico.org.uk

You can also obtain further information about your rights from the ICO or from your local Citizens Advice. If your concern is about the service you have received more generally, please see our separate Complaints Policy.