

## **Definitions**

“We” or “M&M Sales Lettings Management” applies to the following companies: **M&M Sales Lettings Management Ltd**

We have updated our privacy policy to explain how M&M Sales Lettings Management collects and uses your data. It also explains why we collect this data in the first place and who we share it with. It also details how you can control how we manage your data and how we protect your rights and interests as a data subject. This updated policy comes into effect from April 2024.

## **Information held**

The personal data we process may include the information detailed below and may also include other sensitive data concerning health, if relevant to your application. Where the provision of data is a statutory, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data may mean that we are unable to provide you with our service.

To ensure that we provide you with the best service possible we will need to collect and retain certain personal data. The data will be collected and processed by members of our staff. How we source the data is identified below. We may source data from third parties or via third parties e.g. Credit and referencing company or identification checking companies.

## **What information we collect from you**

M&M Sales Lettings Management normally collects the following types of information from our clients depending on your relationship with us:

- Full name
- Current & previous address
- Telephone numbers
- Email address
- Date of birth
- Current and previous employment details
- Personal debt details
- Salary details
- National insurance number
- Bank details
- Current and previous landlord details
- Current or proposed mortgage details
- Accountant details
- Solicitors details
- Identification documents

## **Whom we can collect this information from**

We generally collect this information from the following individuals in our daily conduct of business:

- Property Enquirer
- Applicants
- Tenants
- Permitted occupiers
- Next of kin
- Guarantors
- Relevant persons
- Prospective landlords
- Previous landlords
- Current landlords
- Prospective buyers & sellers
- Current buyers & sellers
- Contractors
- Prospective staff
- Current staff

#### **How we collect this information**

We collect this information in several different ways namely being you contacting us by telephone, email or face to face when you:

- Enquire about a property we have available to let or sell
- Complete an application form for a property we have available for let
- Place an offer on a property we have to sell
- Instruct us to manage, let or sell a property for you
- During the course of our management services
- Apply for an employment position we have available
- Enquire about conducting business as one of our preferred contractors
- Make a payment on behalf of someone else

#### **How we use your information & why we collect it**

We may use your information to:

- Contact you regarding available properties we believe to be suitable for you and offer extra services

- Process applications from applicants who have applied to rent a property through us or applied to stand as a guarantor for an applicant
- Progress sales if you have made an offer to buy a property which has been accepted in principal or you are the owner
- Verify identity to include conducting right to rent checks and confirm ownership of the property
- Resolve maintenance issues
- Ensure legal documents are completed i.e. tenancy agreements & prescribed information
- Process payments to you
- Chase rent arrears
- Conduct performance reviews for staff
- Provide contractors with worksheets for maintenance

#### **Who we share your information with**

We do not sell your information to anyone, however we may need to share your information with the following based on the Lawful Basis of Processing (see later):

- Landlords
- Utility companies
- Local authorities
- Emergency Services
- Deposit schemes
- Contractors
- Solicitors and courts (where legal action is required)
- Insurance providers
- Referencing providers
- The Home Office
- Software providers
- Marketing companies (where consent is given)

#### **How we store your information**

We store this information on our digital/electronic database and when necessary paper files. Any information is stored on servers which are held in the EU.

#### **How long we store your information for**

We will retain your information for as long as reasonably required to fulfil the purposes of this policy and no longer. However generally we will keep your personal information for no longer than six years and one month.

### **Lawful Basis of Processing**

Archer Bassett will process your information based on the following basis:

1. **1. Consent** – We may need your consent for some of the data we collect/process. Where consent is needed we will seek your consent prior to processing your information. Please note consent is not needed for the majority of the data we collect.
2. **2. Contractual Fulfilment** – If you enter in to a contract either with M&M Sales Lettings Management or provided by M&M Sales Lettings Management we may need to process your data to adhere to the contract and consent will not be needed.
3. **3. Compliance with the law** – We may need to process your data in accordance with the law, such as providing your information to HM Revenue and Customs to adhere to tax implications.
4. **4. Legitimate Interest** – We may process your data if we have a legitimate interest to do so in accordance with our business relationship.
5. **5. Protecting Vital Interests** – Your data may need to be processed to protect you in extreme situations.
6. **6. Public Interest of Official Function** – Your data may be processed and provided to official functions such as councils to protect the interests of the public.

### **Online identifiers, IP addresses & cookie identifiers**

Where you visit our website we may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns.

We may obtain information by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our

system will issue cookies when you log on to our site. You can find more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org)

This policy only applies to our site. If you leave our site via a link or otherwise, you will be subject to the privacy policy of that website provider. We have no control over that privacy policy or the terms of the website and you should check their privacy policy before continuing to access the site.

### **Recording Telephone Calls**

When you call our offices or we call you the phone call may be recorded for security, training and monitoring purposes. If we are taking a payment over the phone then to protect your security we do not record the specific part of the call when we actually take the card details. You will be notified that we are no longer recording the call and you will also be notified when we resume the recording.

### **Your rights**

You have a right of access to check your personal data to verify the lawful basis of processing. We are obliged to respond to an access request within 30 days and may not charge a fee unless the request is unfounded, excessive or repetitive. If a fee is charged it is to be a reasonable fee based upon the administrative cost of providing the information.

You have a right to rectification if the data we hold is either inaccurate or incomplete. If your data has been disclosed to third parties then we must inform them of the rectification, where possible.

You have a right to erasure of your data when consent is our basis of processing (the right to be forgotten). You may request that your personal data be erased, for example, where there is no compelling reason for its continued processing or where you withdraw consent. We will comply with your request unless we have another basis of processing justifying our retaining the data (for example a legal requirement or the defence of a legal claim).

You have some rights to ask us to restrict processing i.e. to block or suppress processing where, for example, the data may be incorrect and whilst the accuracy is verified. We are permitted to store the data.

### **Your right to object**

You do have a right to object to further processing of your personal data. We may be required to stop processing unless there is some other legitimate basis of processing such as a legitimate interest or a requirement for the exercise or defence of a legal claim.

### **Withdrawal of consent**

Where the lawful basis for processing is your consent, you may withdraw consent at any time by writing to, M&M Sales Lettings Management Ltd, 53 Belgrave Road, Coventry, CV2 5AX or emailing [info@mandmsl.co.uk](mailto:info@mandmsl.co.uk)

### **How to contact us**

You can contact M&M Sales Lettings Management at any time if you have any queries regarding this privacy policy or if you wish to make a complaint regarding how we are processing your data. Contact us on 02476 269517 or [info@mandmsl.co.uk](mailto:info@mandmsl.co.uk). We are registered as a data controller with the ICO and our registration number is ZB587616

### **How to lodge a complaint with the supervisory authority**

The supervisory authority responsible for data protection is the Information Commissioners Office (ICO) to whom concerns may be reported by phone on 0303 123 1113 or +44 1625 545 745 if calling from outside the UK, by email using the form on the website [ico.org.uk](https://ico.org.uk) or the livechat function.