

GATEHOUSE PROPERTY MANAGEMENT
LIMITED
DATA PROTECTION PRIVACY
STATEMENT

Gatehouse Property Management Limited (“GPM”) respects your privacy and is committed to protecting your personal data. This Data Protection Privacy Statement will inform you as to how we look after and deal with your personal data, tell you about your privacy rights and how the law protects you.

Purpose of this Privacy Statement

This Data Protection Privacy Statement aims to give you information on how GPM collects and processes your personal data.

It is important you read this Data Protection Privacy Statement so that you are fully aware of how and why we are using your data.

The document provides you details on the following subjects:

- **Introduction - who we are**
- **Complaints procedure and your rights under Data Protection Act 2018**
- **Information you have given us by other users**
- **What data do we collect and what we do with the data collected**
- **How is your personal data securely stored**
- **How long the data is stored for**
- **Audits of data collected**
- **Changes to the Data Protection Privacy Statement and informing us of changes**

1. INTRODUCTION

GPM are a commercial property management services provider in the UK. A full scope of our services and details of our company can be found on - <http://gatehousepm.co.uk/>

Our head office address and contact details are as follows:

8 John Street
Glasgow
G1 1JQ
Tel: 0141 348 7888
Email: enquiries@gatehousepm.co.uk

2. DATA PROTECTION PRIVACY STATEMENT

GPM respects your privacy and is committed to protecting your personal data. This Data Protection Privacy Statement will provide you with an overview of how we protect your personal data on the following basis:

- Purpose of holding data
- Timescale of holding data
- Authorised users
- Audit of personal data

GPM collects a mix of data from several parties, the main source of information will be collected from:

- Employees
- Tenants
- Clients
- Contractors

Within this Data Protection Privacy Statement, we have demonstrated the process for the different types of information we record and how we deal with the information.

In compliance with the rights contained within the Date Protection Act 2018, you have the following rights:

- **Access to your information** – you have the right to request a copy of the personal information that we hold on you
- **Correcting your information** – we want to make sure your personal information is accurate, complete and up to date therefore you may ask us to correct any personal information about you which you believe does not meet these standards
- **Deletion of your information** – you have the right to ask us to delete personal information about you subject to GPM satisfying their statutory obligations
- **Withdraw your consent** – you can withdraw your consent for us to use your personal data for a specific purpose, subject to GPM satisfying their statutory obligations

In order to implement any of the above action points, please contact GPM directly on the details noted above.

If you provide details to GPM about other individuals or organisations, we require you to make sure that they are aware you have given their details to GPM and refer them to our website where they will find a copy of our Data Protection Privacy Statement.

3. COMPLAINTS

GPM take all complaints seriously and ensure all complaints are handled in a professional manner. If you have a complaint you would like to discuss, please contact GPM directly on the details noted above. However, you also have the right to lodge a complaint with the Information Commissioner's Office, details of which are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel No: 0303 123 1113 (local rate)
Alternative Tel No: 01625 545 745
Website: <https://ico.org.uk>

This Data Protection Privacy Statement provides a further insight into the kind of information we hold, the purpose of holding the information, the timeframe we intend to hold the information for and the audits we undertake on the information we hold.

4. EMPLOYMENT DATA

GPM has an electronic record of the following employee details:

- Name
- Address
- Telephone number
- Email address
- Date of Birth
- Emergency contact details
- Bank account details
- National Insurance Number

Purpose

GPM is required to keep records of the above information for the following reasons:

- To comply with the terms of employee's contract of employment
- To allow payment of salaries and wages
- To comply with HMRC regulations
- In the event of a workplace incident arising
- To demonstrate compliance with training requirements and qualifications e.g. security industry licences and first aid

Timescale

The above information is required to be kept for the following timescale:

- Period of employment
- For a period of 7 years after the date of termination of employment to comply with HMRC regulations.

Authorised Users

Computer files containing employee data are stored on a password protected shared-drive. Hard copies of employee's personal data which we are required to retain are filed in secured storage units. The information can only be accessed by the following authorised personnel:

- A director of the company
- Other senior personnel e.g. centre managers

Approval from Employees

As part of the GPM new starter details form, all employees sign a contract providing GPM with formal consent to store and use their personal data for ongoing personnel and payroll administration in compliance with the Data Protection Act 2018. The starter form also states it is the employee's responsibility to notify GPM of any changes to their personal data.

Annual Audit of Data

The GPM Finance Director and Facilities Manager will review all employee information held on an annual basis and will remove all employee information which is no longer required.

5. TENANT DATA

GPM holds information on the tenants of the properties we manage on behalf of our clients which generally includes the following:

- Names
- Addresses
- Telephone number
- Email address
- Bank account details
- Emergency contact
- Photographic ID
- Proof of address (e.g. utility bill)

Purpose

As part of tenant's introduction and lease documentation, we will obtain the tenant's consent to hold the above data which allows GPM to undertake the following:

- Rent reviews, lease renewal, alternation to premises and assignments
- Recovery of charges related to the lease agreement
- Prepare Service charge budgets and reconciliations
- Provide advice on Landlord/Tenant works
- Marketing, events, newsletters, website, quarterly tenant's meetings
- Ensure compliance with any applicable legislation

Timescale

GPM is required to hold tenant information for the following timescale:

- Term of lease agreement
- 7 years to comply with HMRC regulations

Authorised Users

Tenants' details are held in Propman which is GPM's property management and accounting system. The system is operated on a licence and each authorised user has individual password protection.

Tenants' details may also be held onsite at the properties managed by GPM, if so, the data will be stored in a secured storage unit which can only be accessed by authorised personnel.

The authorised users of tenant's information are:

- Centre management staff
- Property management staff
- Finance staff
- Authorised security personnel – due to the centre being opened 24/7, security staff are required to have access to this data in the event of an emergency

Annual Audit of Data

GPM will undertake an annual audit of tenant data held by GPM. The audit will be undertaken by the appropriate authorised personnel who will remove all tenant information which is no longer required.

6. CLIENT DATA

GPM holds the following personal data on our clients:

- Business/Trading Name
- Addresses
- Email addresses
- Telephone numbers
- Bank account details
- Relevant individual contact names

Purpose

GPM holds the above client data in order to undertake the following:

- Provide our clients with updates on the management of their assets
- Provide finance reports for the properties GPM manage on behalf of their clients
- Obtain client approval for unbudgeted works
- Obtain client consent to amend tenant's lease for example rent review, lease renewal, tenant alterations, payment plans, write off arrears, etc
- Organise meetings to report on the management of the assets managed by GPM
- Pay over any funds due to clients

All information is saved on the GPM server which is password protected.

Timescale

GPM will hold client's information on our system for the period of:

- Term of the management agreement
- 7 years to comply with HMRC regulations

Authorised Users

Client details will be used by the following employees:

- Property management staff
- Finance staff
- Centre management staff

Audit

GPM will undertake an annual audit on client data held by GPM. The audit will be undertaken by the appropriate authorised personnel who will remove all client information which is no longer required.

7. CONTRACTOR DATA

GPM hold the following personal data on our contractors:

- Business/Trading Name
- Addresses
- Email addresses
- Telephone numbers
- Bank account details
- Relevant individual contact names

Purpose

GPM hold the above details for our contractors for the following reasons:

- Instructing works
- Ordering goods or services
- Requesting advice on specific projects
- Payment of invoices

GPM may also request an electronic copy of the contractor's licences/qualifications required to undertake work onsite. Once the documents have been reviewed the information is deleted from our system.

Timescale

GPM will hold contractor information on our system for the period of:

- 7 years to comply with HMRC regulations

Authorised Users

Contractor details will be used by the following employees:

- Centre management staff
- Property management staff
- Finance staff

Audit

GPM will undertake an annual audit of contractor data held by GPM. The audit will be undertaken by the appropriate authorised personnel who will remove all information on contractors which is no longer required.

8. MORE INFORMATION

If you do not have access to the internet you can contact us via telephone or post to request a hard copy of our Data Protection Privacy Statement.

9. CHANGES TO GPM DATA PROTECTION PRIVACY STATEMENT AND INFORMING US OF CHANGES

We may update this Data Protection Privacy Statement from time to time. Please review this Statement periodically for changes. This Data Protection Privacy Statement was last updated on 26 April 2019.

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