



## Ocean Residential Ltd – Privacy Policy

### INTRODUCTION AND SCOPE OF THIS PRIVACY POLICY

Ocean Residential want you to be confident in the security of the personal data we hold for you. This privacy policy aims to give you a clear view of how we use personal information provided by you, our dedication to protecting it, your rights and the options you have to control your personal data and protect your privacy. It also outlines what personal data we collect about you when you visit our website, how we use your personal information and third parties we will share it with.

### REASONS/PURPOSES FOR PROCESSING INFORMATION

We process personal information to enable us as to carry out all property services, promote and advertise our services, maintain our own accounts and records, support and manage our employees and for the various purposes as described in detail below.

### PERSONAL DATA WE COLLECT FROM YOU

“Personal Data” is any information that relates to you and identifies you personally, either alone or in combination with other information available to us. This will generally be: name including ‘title’, mobile/home/work telephone numbers, email and home address. In the case of ‘tenants’, more information will be needed to cover legal requirements and referencing. If we hold an event and required your dietary requirements, your data would be deleted after the event.

### INFORMATION WE COLLECT AUTOMATICALLY

Ocean Residential also collect information from enquiries to our website and the use of Google Analytics. We may in the future use Cookies which will be advised here in our Privacy Policy.

### HOW WE USE YOUR PERSONAL DATA

We use your personal data to assist you with all your property requirements and to enable us to keep in touch with you and provide the service you expect. Your personal data will also be used to enable us to perform all contractual and legal requirements on your behalf. To adhere to the new General Data Protection Regulations 2018 (GDPR) and for lawful reasons, Ocean Residential will need to hold and process your personal data for:

- Contractual necessity (legal necessity)

- Compliance with legal obligations
- Legitimate Interest
- Marketing if Consent given

Ocean Residential will securely store your personal data for as long as we are acting in your interests to provide the full letting agency service required. We may from time to time transfer your personal data to a country outside of the EEA. For example; when personal data is stored on a cloud server.

#### KEEPING YOU UP TO DATE WITH OUR KNOWLEDGE, EXPERTISE, SERVICES & EVENTS THIRD PARTIES

We will share your personal data as necessary and on the lawful grounds described above with various third parties who process your personal information on our behalf. Where necessary or required we share information with:

- business associates
- suppliers of goods or services
- financial organisations
- credit reference agencies
- debt collection and tracing agencies
- local and central government
- police forces
- security organisations
- current, past and prospective employers
- employment and recruitment agencies
- educators and examining bodies
- other companies in the same group

A comprehensive list of these third parties appears at the end of this Privacy Policy. We require that these service providers and other third parties adhere to strict rules when processing your personal data, including to only use your personal data in accordance with Ocean Residential instructions and/or the applicable laws. We require all third parties to delete all your personal data at the end of the specific service/provision we have asked them to undertake and not to use it for their own marketing.

#### HOW WE PROTECT YOUR PERSONAL DATA

We are committed to protecting your personal data and implement; appropriate technical and organisational security; and training measures, to protect it against any unauthorised or unlawful processing and against any accidental loss or damage.

All Ocean Residential Data Processors and joint Data Controllers will be contracted to only use your data as instructed by Ocean Residential and to protect the confidentiality and security of your data at all times in accordance with GDPR requirements. All data retention is stored securely with limited access. When data is deleted it is done so irretrievably, all

hard copy papers are shredded and disposed of in confidential waste. Clients may request their paperwork is returned and would need to arrange collection of this from the office.

## YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

The new GDPR legislation creates rights for data subjects. These are the right to be informed, the right of access, the right to rectification, the right of erasure, the right to restrict processing, the right to data portability, the right to object and rights in relation to automated decision making and profiling. With regard to the 'right to be forgotten' (right of erasure), by law we have to keep your data for six years with regard to our legal obligations to HMRC for tax purposes. We also have a legal obligation to hold the following data on outgoing tenants for six years:

- Deposit information held with the Tenancy Deposit Scheme
- Right to Rent
- Invoices linked to the tenancy
- Dilapidation Report
- Exit Inspection

Any AML (Anti Money Laundering) information obtained through any department also needs to be kept for 6 years.

## IF THERE IS A BREACH

In the event of a data security breach, we will advise you and any other parties as soon as we are made aware of the breach and notify the Information Commissioner's Office (ICO) if appropriate.

## OUR COMPLAINTS PROCEDURE

If you have a grievance, please write in the first instance to Ocean Residential at our office address or using our contact form. The grievance will be acknowledged within 3 working days, investigated thoroughly in accordance with established internal procedures and a reply sent to you with our final viewpoint on the matter within 15 working days.

If you remain dissatisfied with the result of the internal investigation, you can then contact the Property Ombudsman to request an independent review.

(The Property Ombudsman Ltd, Milford House, 43-55 Milford Street, Salisbury, Wiltshire SP1 2BP – 01722 333 306) Please refer to their website for further details. [www.tpos.co.uk](http://www.tpos.co.uk)

## LISTED BELOW ARE OUR CORE THIRD PARTY COMPANIES/CONTRACTORS

Joint Data Controllers – For further information on their Privacy Policies, please visit their websites

FCC Paragon [www.fccparagon.com](http://www.fccparagon.com)

Tenancy Deposit Scheme [www.tenancydepositscheme.com](http://www.tenancydepositscheme.com)

The Property Ombudsman [www.tpos.co.uk](http://www.tpos.co.uk)

Nest Pensions [www.nestpensions.org.uk](http://www.nestpensions.org.uk)

TransUnion <https://www.callcredit.co.uk/legal-information/bureau-privacy-notice>

#### DATA PROCESSORS

H & M Maintenance Ltd

DPL Plumbing Ltd

MAP property services

Southend Carpets

H & G Brooks Roofing

Sparks Electrical Services Ltd

SS1 Cleaning

Gemini Windows Ltd

Veri Smart Inventories

From time to time we might also use other contractors if and when necessary.