



## General Data Protection Regulations Statement June 2018

Johnson Burke & Co Ltd (“JBL”) values your privacy and cares about the way in which your personal data is treated. This policy describes what personal data we collect about you, how we obtain it, how we use it, on what basis, how long we keep it for, who we share it with, how we protect it, and your rights regarding its control and processing.

‘Personal data’ is defined as any information relating to an individual, whether it relates to their private, professional or public life. It can be anything from a name, a home address, a photo, an email address, bank details, posts on social networking websites, medical information, social services records, records of criminal convictions, or a computer’s IP address.

**Personal data we collect about you:** We may collect personal data from you in the course of our business, including through your use of our website, when you contact or request information from us, or because you own or live in a flat in a block we manage.

The personal data that we process includes:

- Basic data, such as your name (including prefix or title);
- Contact data, such as your postal address, email address and phone number;
- Financial data, such as payment-related information;
- Technical data, such as data from your visits to our website or in relation to materials and communications we send to you electronically;
- Data you provide to us in connection with your property;
- Any other data relating to you which you may provide to us or ask us to obtain on your behalf.

**How we obtain your personal data:** We collect data from you:

- As part of our client onboarding process, where other people responsible, or previously responsible, for the management of your building give us contact lists, previous accounting and other records;
- When you provide it to us, or interact with us directly, for instance completing a contact form, engaging with our staff or registering on our website;
- When monitoring our technology tools and services, including our websites and email communications sent to and from JBL; and
- We may collect or receive data about you from other sources, such as the Board of your building, your landlord (if you are a tenant), or by keeping the contact details we already hold for you accurate and up to date using publically available sources.

**How we use your personal data:** JBL collects and processes personal data about you in a number of ways in the provision of services by us. We use that data:



- To communicate with you about matters affecting your building or your own property;
- To demand and collect service charges and other due contributions from you;
- To manage and administer our relationship with you and the management of your building;
- To provide and improve our services to you and to our clients, including handling the personal data of others on behalf of our clients;
- To provide data requested by you; and
- To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims.

**Use of our websites:** Some facilities on our websites invite you to provide us with personal data, such as our email queries facilities. The purpose of these facilities is apparent at the point that you provide your personal data and we only use that data for those purposes.

Our website uses Google Analytics, a web-based analytics tool that tracks and reports on the manner in which the website is used to help us to improve it. Google Analytics does this by placing small text files called 'cookies' on your device. The data that the cookies collect, such as the number of visitors to the site, the pages visited and the length of time spent on the site, is aggregated and therefore anonymous.

You may refuse the use of cookies or withdraw your consent at any time by selecting the appropriate settings on your internet browser, but please note that this may affect your use and experience of our website. By continuing to use our website without changing your privacy settings, you are agreeing to our use of cookies.

**Marketing and other emails:** We do not use your data to send marketing or promotional emails, nor do we share your data with any other party for this purpose.

**Property and other services:** We collect, create, hold and use personal data in the course of and in connection with the services we provide to our clients. We will process personal data provided to us by or on behalf of our clients for the purposes of the work we do for them. The data may be disclosed to third parties to the extent reasonably necessary in connection with that work.

**On what basis we use your personal data:** We use your personal data on the following bases:

- To perform our duties under our contract with our clients, including the collection of service charges, ground rents and other property-related sums due; to inform you about our work on your building and of relevant activity and work undertaken in the building; and to raise any other matter with you which is relevant to your ownership or occupation of your property;
- To comply with legal and regulatory obligations;
- For the good management of the building; and
- For legitimate business purposes. This means the interest of JBL in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your



personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**How long we keep your personal data:** Your personal data will be retained in accordance with our data retention policy which categorises all of the data held by JBL and specifies the appropriate retention period for each category of data. Those periods are based on the requirements of applicable data protection laws and the purpose for which the data is collected and used, taking into account legal and regulatory requirements to retain the data for a minimum period, limitation periods for taking legal action, good practice and JBL's business purposes.

**Who we share your personal data with:** We may share your personal data with certain trusted third parties in accordance with contractual arrangements in place with them, including:

- Suppliers to whom we outsource certain support services such as property surveying, inspection and repair;
- Our professional advisers and auditors;
- IT service providers to JBL; and
- The board of directors or equivalent body for your building.

Where necessary, or for the reasons set out in this policy, personal data may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your data to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.

If in the future we re-organise or transfer all or part of our business, we may need to transfer your data to new entities or to third parties through which the business of JBL will be carried out.

JBL uses social media sites such as Facebook, LinkedIn, Instagram and Twitter. If you use these services, you should review their privacy policy for more information on how they deal with your personal data.

We do not sell, rent or otherwise make personal data commercially available to any third party.

**How we protect your personal data:** We use appropriate security measures to prevent your personal data from being lost, used or accessed in an unauthorised way, altered or disclosed. We have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**Which countries we transfer your personal data to:** In order to provide our services we do not generally need to transfer your personal data to locations outside the European Economic Area ('the EEA') for the purposes set out in this privacy policy.



Where our third party service providers process personal data outside the EEA in the course of providing services to us, our written agreement with them will include appropriate measures to ensure that your personal data remains protected and secure in accordance with applicable data protection laws.

**Your rights regarding your personal data:** The European Union's General Data Protection Regulations and other applicable data protection laws provide certain rights for data subjects.

You are entitled to request details of the data we hold about you and how we process it. You may also have a right in accordance with applicable data protection law to have it amended or deleted, to restrict our processing of that data, to stop unauthorised transfers of your personal data to a third party and, in some circumstances, to have personal data relating to you transferred to another organisation. You may also have the right to make a complaint in relation to our processing of your personal data with the Information Commissioner's Office.

If you object to the processing of your personal data, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal data to the extent required or otherwise permitted by law, in particular in connection with carrying out our duties for our clients, defending our legal rights or meeting our legal and regulatory obligations.

We must ensure that your personal data is accurate and up to date. Therefore, please advise us of any changes to your data as soon as possible.

**Enquiries, complaints & requests:** All enquiries, complaints and requests relating to personal data should be directed to us by post to PO Box 719, Pinner HA5 9PZ. If you are not satisfied with the way your query is handled, you can contact the ICO direct (see [www.ico.org.uk](http://www.ico.org.uk) for details). Our ICO registration number is ZA130122.

**Data controller:** Our IT systems are located within the EEA and controlled by JBL. This company is the data controller in relation to your personal data.

**Policy updates:** This policy was last updated on 8 June 2018. Any changes to this policy will be notified to you as promptly as possible in accordance with our legal obligations.