

Doing it the right way.



# Life Property Management Privacy Policy

0333 240 8325  
enquiries@lpmonline.co.uk  
www.lpmonline.co.uk

## Privacy Policy

Life Property Management Ltd ("**lpm**") provides property management and factoring services. **lpm** is committed to ensuring that any personal data (including special category data) which we use is processed in accordance with data protection law.

### Protecting your Privacy

As our client, it is important that you trust us with your personal data.

To ensure that we meet our promise to you as being transparent, we have updated our Privacy Notice which explains how we collect, store and handle your personal data.

This policy applies to all personal data processed by **lpm** and is part of our approach to compliance with data protection law (including the General Data Protection Regulation 2016/679 and all relative EU and Member State data protection legislation in force and amended or replaced from time to time). All **lpm** staff are expected to comply with this policy.



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## Data Protection Principles

**lpm** confirms that it complies with the following data protection principles and undertakes to ensure that when it processes personal data:

- It is processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- It is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; ('purpose limitation')
- It is all adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed; ('data minimisation')
- It is all accurate and, where necessary, kept up to date and that reasonable steps will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')
- it is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; ('storage limitation')
- It is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

**lpm** is committed to facilitating and complying with any request from a data subject who wishes to exercise their rights under data protection law in a transparent manner and without undue delay.

We will not transfer any personal data to a country outside the EU or an international organisation without ensuring the level of protection provided by data protection law is not undermined.



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## Why We Hold Your Information

We hold your personal data to allow us to provide you with the best possible Property Management Service as per our contractual obligations.

We will:

- Only collect and process the personal data that it is necessary for the purpose or purposes that we have identified in advance;
- Ensure that the legal basis for processing personal data is identified in advance;
- Ensure that as far as possible the personal data we hold is accurate;
- Only process your data for as long as is it required for our purposes and then we will securely dispose of, or delete personal data. Our Data Retention Policy sets out the appropriate period of time;
- Provide information about what we do with personal data in our privacy notice which provides more detail on why we are asking for personal data and what we intend to do with it;
- Not do anything with your data that you would not expect given the content of this policy and our privacy notice; and
- Ensure that appropriate security arrangements are in place in relation to the personal data we holds.

We will also ensure that all staff who handle personal data are aware of their responsibilities under this policy and other relevant data protection and information security policies and that they are adequately trained, supervised and monitored.

## How We Collect Your Information

We collect your information from various sources including Developers, Previous Property Management Companies, Land Register or directly from you as our client.



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## Why We Share Your Information

We will sometimes share your data with third parties to allow us to meet our contractual obligations as your appointed Property Management Company.

## Data Subject Rights

**lpm** will ensure that it has procedures in place to allow data subjects to exercise the following data subject rights under the GDPR:

- Subject access: the right to request information about how personal data is being processed including whether personal data is being processed and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:
  - the purpose of the processing;
  - the categories of personal data;
  - the recipients to whom data has been disclosed or which will be disclosed;
  - the retention period;
  - the right to lodge a complaint with the ICO;
  - the source of the information if not collected direct from the subject; and
  - the existence of any automated decision making.
- Rectification: the right to allows you to rectify inaccurate personal data concerning you without undue delay.
- Erasure: the right to have data erased in certain circumstances, and to have confirmation of erasure, but only where:
  - the data is no longer necessary in relation to the purpose for which it was collected;
  - where consent is withdrawn;
  - where there is no legal basis for the processing; or
  - there is a legal obligation to delete data.

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- Restriction of processing: the right to ask for certain processing to be restricted in the following circumstances:
  - if you contest the accuracy of your personal data;
  - if our processing is unlawful and you do not want it to be erased;
  - if we no longer need the data for the purpose of the processing but it is required by you for the establishment, exercise or defence of legal claims; or
  - if you have objected to the processing, pending verification of that objection.
- Data portability: you have the right to receive a copy of the personal data you have provided to us and certain information generated by us, if our processing is carried by automated means, which will allow you to transfer it to another data controller. This only applies if our legal basis for processing is consent or under a contract.
- Object to processing: you have the right to object, on grounds relating to your particular situation, to the following:
  - processing carried out in the public interest or in the exercise of official authority; or
  - processing relying on the legitimate interests processing condition unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- Object to automated decision making: if we are making decisions about you based on automated processing which have a legal or similar effect on you, then in some circumstances you have the right to object to this decision being made solely on the basis of automated processing. This includes any profiling of you that we carry out.
- You cannot exercise this right in the following circumstances when the processing is:
  - • necessary for entering into or the performance of a contract;
  - • authorised by law; or
  - • based on explicit consent.

You have an absolute right to object to any direct marketing that we are sending to you and there are no exemptions to this which would allow you to refuse to comply.

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## Special Category Personal Data

This includes personal data:

- Revealing racial or ethnic origin,
- Revealing political opinions,
- Revealing religious or philosophical beliefs,
- Revealing trade union membership,
- Which is genetic data and biometric data being processed for the purpose of uniquely identifying a natural person,
- Concerning health, including physical and mental health;
- Concerning a natural person's sex life or sexual orientation, and
- Relating to criminal convictions or offences.

## Personal Data Breaches

**lpm** has a register of data breaches and all personal data breaches will be recorded in this register which will be monitored. Action will be taken in relation to any issues identified in this register, particularly if any pattern of breaches is identified.

**lpm** will report personal data breaches which are likely to result in a risk to the rights and freedoms of the data subject to the Information Commissioner's Office as required by data protection law.

We will also communicate any personal data breach which is highly likely to result in a risk to the rights and freedoms of the data subject to the data subject or subjects involved in compliance with data protection law.



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## Data Protection Impact Assessment (DPIA)

When **lpm** embarks on a new project which involves the processing of personal data, particularly one using new technologies, we will carry out a DPIA in line with our policy. The decision to carry out a DPIA will take into account the nature, scope, context and purposes of the processing and determine if there is likely to be high risk to the rights and freedoms of natural persons.

If you have any concerns or wish to exercise any of your rights under the GDPR then you can contact **lpm's** data protection lead in the following ways:

Data Protection Manager

Lorraine Stead

Life Property Management Limited, Regent Court, 70 West Regent Street, Glasgow, G2 2QZ

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## Monitoring and Review

This policy was last updated on 25 May 2018 and shall be regularly monitored and reviewed every two years.

## What Does This Mean For You?

You don't need to take any action right now, but if you wish to find out more, please feel free to view our Privacy Notice.

## **lpm** are committed to continued investment in Client Communication

## **lpm** Doing it the right way

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