



JA Management Commercial Privacy Policy

This policy (together with any other documents referred to) sets out the basis on which we will process personal data we collect from you, or that you provide to us, as a result of your use of our website or services. It supplements and should be read in addition to other terms and conditions that you have agreed to in connection with your use of our website or our services. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Information We May Collect From You

We may collect and process the following data about you:

- Information that you provide to us.
- Details of your visits to our site and the resources that you access.

JA Management is committed to protecting and processing your personal data in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. For the purpose of the legislation JA Management is the Data Controller.

Information held and lawful basis of processing

All the personally identifiable information we hold for all parties we interact with is listed in the tables below under the *Information Held* column. The purpose of our holding it is listed in the *Why is it held* column. There are six lawful bases for processing your data including consent, a legitimate interest, contract fulfilment, a legal obligation and a vital interest. Under the *Lawful Basis of Processing* column we have listed the relevant basis for each piece of data. 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 services. It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations, details of potential recipients are included under *Who will it be shared with*.

Data collected will vary depending upon your relationship with this Company. If you are a Landlord and we rent out a property on your behalf see 'Rental Landlords', if you are a rental tenant see 'Rental Tenants', etc. Be aware there may be overlap between categories and you may fall under more than just one category (for example, if you are a rental tenant in a block we manage you will fall under 'Rental Tenant' and 'Block Management; residents').

Rental Landlords;

INFORMATION HELD	WHY IS IT HELD	LAWFUL BASIS OF PROCESSING	WHO MIGHT IT BE SHARED WITH
Name & address of rental property	To use on Management contract	Contract Fulfilment	N/A
	To use on Rental Contracts	Contract Fulfilment	Rental tenant(s), Local Authority, Utilities
	To inform Utility Companies during a void period	Contract Fulfilment	Utility suppliers, Local authority
	To use on Deposit Protection Certificate (Prescribed Information)	Legal Obligation	Deposit Protection Scheme
	If legal action (such as a Section 21 Notice) is required	Legal Obligation	Rental tenant(s), Solicitor (if appropriate) and Local Authority
	If HMRC request a rental income return	Legal obligation	HMRC
Landlord contact details. These are;	To contact Landlord regarding property (repairs, invoices, etc.)	Contract Fulfilment	N/A

- Contact telephone number - Postal address - E-mail address	To use on Management contract	Contract Fulfilment	N/A
	To use in prescribed information	Contract Fulfilment	Deposit Protection Scheme
	To chase rent arrears	Contract Fulfilment	Solicitor
	If HMRC request a rental income return	Legal obligation	HMRC
Bank Account details	To transfer balance of rent	Contract Fulfilment	N/A

Rental tenants;

INFORMATION HELD	WHY IS IT HELD	LAWFUL BASIS OF PROCESSING	WHO MIGHT IT BE SHARED WITH
Tenant contact details. These are; - Name - Previous address - Current address (rented property) - Contact telephone number - E-mail address - Forwarding address (upon moving out) Tenant reference documentation. These are; - Photo page of passport (and work visa if required) - Employment details and/or a details of University study) - Bank Statements - Previous address - Any other documents or information provided	To contact tenant	Contract Fulfilment	N/A
	To use on Rental Contract (name & current address only)	Contract Fulfilment	Landlord, Local Authority, Utilities.
	To inform Utility Companies upon move in and move out	Contract Fulfilment	Utility suppliers
	To use on Deposit Protection Certificate (Prescribed Information)	Legal Obligation	Deposit Protection Scheme
	If legal action is required	Legal Obligation	Lawyer(s), Police
	In the event of an emergency	Vital Interest	Emergency Services
	Referencing & assessment	Contract Fulfilment, except passport photo page and work visa which is a Legal Obligation	Referencing Company(ies), passport photo page and work visa may be shared with the Home Office

Block Management; leaseholders / owners

Data collected may vary from block to block depending on what is required. Generally, the following is correct;

INFORMATION HELD	WHY IS IT HELD	LAWFUL BASIS OF PROCESSING	WHO MIGHT IT BE SHARED WITH
Name of all leaseholders / owners and which property is theirs	To contact regarding maintenance issue(s)	Contract Fulfilment	N/A
	To confirm legal owner of property	Contract Fulfilment	N/A
	To be used on correspondence such as AGM notification and Service Charge invoices	Contract Fulfilment	N/A
	To be used by the Accountants at the end of year re. service charge	Contract Fulfilment	Certified Accountants
	Should any form of legal action be required	Contract Fulfilment & / or Vital Interest	Lawyer(s), Police
	In the event of an emergency	Vital Interest	Emergency Services
Leaseholder /owner contact details. These are; - Contact telephone number - Postal address - E-mail address	To contact regarding a maintenance issue(s)	Contract Fulfilment	N/A
	To be used on correspondence such as AGM notification and Service Charge invoices	Contract Fulfilment	N/A

	Should any form of legal action be required	Contract Fulfilment & / or Vital Interest	Lawyer(s), Police
CCTV cameras (if there are cameras on the premises)	Residents security	Contract Fulfilment	Police (in the event of a reported crime)

Block Management; residents

Data collected may vary from block to block depending on what is required. Generally, the following is correct;

INFORMATION HELD	WHY IS IT HELD	LAWFUL BASIS OF PROCESSING	WHO MIGHT IT BE SHARED WITH
Name	To contact you regarding maintenance issue(s)	Contract Fulfilment	N/A
	Should any form of legal action be required	Contract Fulfilment & / or Vital Interest	Lawyer(s), Police
	In the event of an emergency	Vital Interest	Emergency Services (Police, Fire Service, Ambulance, etc.)
Resident contact details. These are; - Contact telephone number - Postal address	To contact you regarding a maintenance issue(s)	Contract Fulfilment	N/A
	Should any form of legal action be required	Contract Fulfilment & / or Vital Interest	Lawyer(s), Police
CCTV camera footage (if there are cameras on the premises)	Residents security	Contract Fulfilment	Police (in the event of a reported crime)

Where is the data stored?

Your personal data is stored electronically on our computer system and through paper records. It may be stored within or outside the European Union but with an organisation operating under GDPR.

Retention period and criteria used to determine the retention period

We may retain some elements of your personal data for up to 6 years after we cease to be your agent. The information will be that which is no longer required for either contractual fulfilment or a legitimate interest. If the lawful basis for processing your data was consent then you may withdraw such consent at any time.

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 require 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).

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.

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 or the livechat function.