

# Complete

Property Management Solutions Ltd

## General Data Protection Regulation (GDPR) Data Protection Registration No Z8871308

### Complete Property Management Solutions Ltd

Registered in England & Wales No 5236404, VAT Reg No 851 4690 18, Data Protection Registration Z8871308



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## Privacy Policy (Customers)

This Privacy Policy describes the way in which Complete Property Management Solutions Limited deal with the information and data you provide to us to enable us to manage your relationship.

We will process any personal information provided to us or otherwise held by us relating to you in the manner set out in this Privacy Policy. Information may be provided via the Complete Property Management Solutions Limited website (the "Website"), telephone calls or any other means.

By accepting this privacy policy you agree that you understand and accept the use of your personal information as set out in this policy. If you do not agree with the terms of this Privacy Policy please do not use the Website or otherwise provide us with your personal information.

## Who we are

References in this Privacy Policy to "Complete Property Management Solutions Limited", "we", "us" or "our" relate to Complete Property Management Solutions Limited, a Limited company incorporated in England and Wales (company number 5236404) for Property Management Services. We control the ways your Personal Data is collected and the purposes for which your Personal Data is used by us, acting as the "data controller" for the purposes of applicable European data protection legislation.

## Contacting us

If you have any concerns, or would like more detail about how we process your Personal Data, you can contact us using [info@completepropertymanagement.co.uk](mailto:info@completepropertymanagement.co.uk)

## Collection and Use of Personal Information

Personal information collected from you may include your name, payment information, postal address, email address, landline or mobile telephone number, delivery details as well as other personal information you provide to us. If you use our website, we may also collect information about you or your computer when you browse to allow you to use the services available.

We may collect and process personal information about you as follows:

- we will collect and store details to enable us to conduct our duties as property managers
- we may collect and store information that you provide by filling in the Contact form or File Upload on our site. This information shall be used both for providing our services and to provide you with information or services that you request from us or which we feel may interest you
- if you contact us, we may keep a record of that correspondence we may also ask you to complete surveys that we use for research purposes
- where we are required to do so by law or for the exercise or defence of legal claim

## Protecting Your Personal Data

Your Personal Data isn't just protected by the quality, commitment and high standards of Complete Property Management Solutions Limited, it's also protected by law. The law states that we can only process your Personal Data when there is a genuine reason to do so and it must be one of the following:

- To fulfil any contract that we have with you
- We have a legal obligation
- Where you have consented to the processing
- When it is in our legitimate interest
- When it is in the public interest
- When it is in your vital interests

## Legitimate Interests

When we have a business or commercial reason to process your Personal Data this is referred to as a legitimate interest. Your Personal Data is still protected and we must not process it in a way that would be unfair to you or your interests.

If we do use legitimate interests as a reason to process your Personal Data we will tell you that we are doing so, what our legitimate interests are and provide you with a method to raise any questions or objections you may have. However, compelling grounds for processing such information may over-ride your right to object.

## How long we keep your Personal Data

Whenever your data is kept by us, we will ensure that it is appropriately protected and only used for acceptable purposes.

We will keep your data for the period that you are a customer of Complete Property Management Solutions Limited.

If you are no longer a customer of Complete Property Management Solutions Limited, we will keep your data for the minimum length of time required to comply with the purposes set out in this policy and relevant legal or regulatory obligations. Your Personal Data may be kept longer if we cannot delete it for technical reasons or you do not notify us that you no longer reside in a development we manage.

## Why we process your Personal Data

### What we do

- Manage customer relationships
  - Develop new services for our customers and to grow our business
- Create, develop and send marketing
- Learn from how our customers' use our services
- To provide support for our services
  
- Develop and manage our brand
- Develop and manage our services
  - To test new systems or services
- To manage our relationship with and the performance of other companies that provide services to us and our customers
  
- Deliver quality services to you
- Create and manage customer accounts and payments
  - Responding to any customer complaints
- Prevent and detect improper use of our systems
  - Prevention of crime
- Detect, investigate and report crime
  - Managing risk for us and our customers
  - Complying with any laws and regulations that apply to us
  
- Manage and run our business to efficiently and effectively provide quality services
  - Manage our finances
- Ensure corporate governance and compliance to all legal and regulatory obligations.
- To run our business in an efficient and proper way
- Fulfil our obligations as an accountable and responsible organisation
  - To exercise our rights set out in agreements or contracts

### How it's justified

- Your consent
- Fulfilling contracts
- Our legitimate interests
  - Legal obligations
  
- Your consent
- Fulfilling contracts
- Our legitimate interests
  - Legal obligations
  
- Your consent
- Fulfilling contracts
- Our legitimate interests
  - Legal obligations
  
- Your consent
- Fulfilling contracts
- Our legitimate interests
  - Legal obligations

### Our legitimate interests

- Maintaining our records
- Letting you know about relevant services
- Developing or improving services and determining who may be interested in them
- Obtaining your consent when needed
- Being efficient about how we fulfil our legal duties and contractual duties
  
- Developing or improving services and determining who may be interested in them
- Being efficient about how we fulfil our legal and contractual duties
- Conducting brand image and reputation protection activities to support and grow the business
- Being efficient about how we fulfil our legal and contractual duties
- Complying laws or regulations that apply to us.
  
- Developing and improving how we deal with crime and attempted crime
- Protecting our customers and ourselves from the impacts of crime
- Complying with laws or regulations that apply to us
- Being efficient about how we fulfil our legal and contractual duties
  
- Complying with laws or regulations that apply to us
- Being efficient about how we fulfil our legal and contractual duties

If you choose not to provide your Personal Data, it may prevent us from meeting legal obligations, fulfilling a contract, or performing services required to manage the development efficiently and in the event of an emergency. Not providing your Personal Data may mean we are unable to provide you with products, services or updates that may benefit you.

## Information Collected

The information and data about you which we may collect, use and process includes the following:

- Information that you provide to us by filling in forms on the Website or any other information you submit to us via the Website or email
- Records of correspondence, whether via the Website, email, telephone or other means
- Your responses to surveys or customer research that we carry out
- Details of the payments you make to us, whether via the Website, telephone or other means
- Details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data

Where it is reasonable for us to do so and not detrimental to your rights and freedoms, we also collect Personal Data from publicly available sources such as internet searches, Companies House, and broadcast media.

## Telephone Calls

Telephone calls to and from our office can be recorded on a Telephone Answering system and also by DDI Manager attached to our phone system in line with the services provided by Complete Property Management Solutions Limited.

## Social Features

If you choose to participate in any of the social features that we provide with our services (such as Facebook, Twitter or LinkedIn) Complete Property Management Solutions Limited may store, record or otherwise process this data.

## What is a Cookie?

Cookies are small text files containing small amounts of information which are sent to and stored on your computer, smartphone or other device when you access a website. Cookies are then sent back to the originating website on each subsequent visit or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

## **Use of Cookies on the Website**

Cookies are generally used to improve and enhance the user experience. Some of the cookies we use are essential for the Website to operate. Complete Property Management Solutions Limited use of cookies on the Website falls into the following categories:

**Session Management** - these cookies are essential to enable use of the Website, they manage session information and enable users to navigate through the Website.

**Functionality** - these cookies store information which enables us to remember user preferences e.g. preferred language, sort types, media settings.

**Fraud Prevention** - these cookies store information which helps us stop fraudulent use of the Website.

**Analysis** – these cookies allow us to recognise and count the number of visitors and to see how they move around our Website when visiting. This helps us to improve the way the Website works, for example, by ensuring that visitors are finding what they are looking for easily and to deliver information which are more relevant to each visitor and their interests and to monitor the effectiveness of such information.

Complete Property Management Solutions Limited might, from time to time, use carefully selected third party tracking and/or analytical cookies to assist in improving the Website and our services for visitors.

Where links are provided on the Website to third party websites it is important to remember that those websites will have their own cookies and privacy policies which will govern any information you may submit. If you decide to use any linked third party websites please read their cookies and privacy policies before doing so.

## **Managing Cookies**

If you want to delete any cookies already stored on your computer or stop the cookies that keep track of your browsing patterns on the Website, you can do so by deleting your existing cookies and/or altering your browser's privacy settings (the process you follow will differ from browser to browser). If you would like more information on how to disable cookies or change your privacy settings, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Your browser's 'help' function should also tell you how to do this.

## **Sharing of Personal Data**

Complete Property Management Solutions Limited do not share client personal data with any other organisations.

## Your rights over your Personal Data

We will assist you if you choose to exercise any of your rights over your Personal Data, including:

- Withdrawing your previously granted consent; however, this will not invalidate any previously consented processing
- Lodging a complaint with any relevant Data Protection Authority
- Access to your Personal Data that we hold or process
- Correction of any Personal Data that is incorrect or out of date
- Erasure of any Personal Data that we process
- Restrict processing of your Personal Data in certain circumstances
- Asking us to provide you or another company you nominate with certain aspects of your Personal Data, often referred to as 'the right to portability'
- The ability to object to any processing data where we are doing it for our legitimate interests
- The ability to contest a decision made entirely by automated processing, to express your point of view and to request that a human review the decision

## Security of Personal Information

We use administrative, technical, and physical measures to safeguard personal information against loss, theft and unauthorised uses, access or modifications.

We take steps to regularly validate the personal information we hold to ensure that the information is accurate and, where necessary, up to date. Information that is no longer required for any valid business purpose, and that we are not required to keep pursuant to any applicable law, will be routinely destroyed by secure means.

## Access to Your Information, Correction and Unsubscribing

If you have any questions about this policy or your personal information please contact us by:

- emailing us at [info@completepropertymanagement.co.uk](mailto:info@completepropertymanagement.co.uk)
- writing to the Managing Director, Complete Property Management Solutions Limited, 41 Dilworth Lane, Longridge, Preston, PR3 3ST

you have the right to request a copy of the information that we hold about you. If you would like a copy of some or all the information we hold about you, please contact us using the contact details given above and by enclosing a SAE.

## No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **Accuracy of Data**

We want to make sure that your information is accurate and up to date. You may ask us to correct or remove information we hold about you that you think is inaccurate by contacting us using the contact details given above

You have the right to ask us not to use your information for marketing purposes. To change your marketing preferences, or to unsubscribe, please contact us at [info@completepropertymanagement.co.uk](mailto:info@completepropertymanagement.co.uk) and we hope you will be happy with the way we handle your information but if not you have the right to complain to the Information Commissioner if there is a problem – for more information visit [www.ico.gov.uk](http://www.ico.gov.uk).

## **Changes to our Privacy Statement**

We may update this policy from time to time, so please review it frequently.

If any material changes are made to this Privacy Policy we will use reasonable endeavours to inform you in advance by email, notice on the Website or other agreed communications channels. We will communicate the changes to you in advance, giving an appropriate amount of time for you to consider and understand the changes before they become effective.

We will not enforce material changes to the Privacy Policy without your express consent. If you decline to accept the changes to the Privacy Policy, or otherwise do not accept the changes within the time period, we may not be able to continue to provide some or all services.