

## **Privacy Policy & Compliance with the GDPR**

### **1. Introduction**

The GDPR (General Data Protection Regulation) came into effect on 25<sup>th</sup> May 2018 and replaced EU Data Protection laws, including the UK Data Protection Act (1998). The GDPR forms part of the data protection regime in the UK, together with the new Data Protection Act 2018 (DPA 2018).

Cornerstone Property Management are committed to protecting and respecting your privacy. For the purposes of data protection legislation, we are the data controller and we will process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 and national laws which relate to the processing of personal data.

By personal data, we mean any information about you from which you can be personally identified, such as your name, address, telephone number or email address, and which is referred to in our Privacy Policy as 'your information'. This will be processed by us, including any of our agents and/or employees, and (where appropriate) any other partners and subcontractors, in accordance with our Privacy Policy.

We will endeavour to treat all of your information in strict confidence and take all reasonable steps to keep your personal information secure once it has been transferred to our systems. However, the internet is not a secure medium and we cannot guarantee the security of any data you disclose online. You accept the inherent security risks of providing information and dealing online over the internet and will not hold us responsible for any breach of security unless this is due to our negligence or wilful default.

This policy document was last updated on 15<sup>th</sup> May 2020, and will be amended as and when required.

### **2. Visitors to Our Website**

**2.1** We may collect and process personal data about you in the following circumstances:

**2.1.1** When you enter your name, email address and other contact details (e.g. home address, contact numbers, etc.) in our Contact Us page.

**2.1.2** Whenever you disclose additional information to us, or we collect information from you in any other way, through our site.

**2.2** We may collect data about your device, including where available your Internet Protocol address, for reasons of fraud protection.

**2.3** We may also collect data about your device's operating system and browser type, for system administration and to report aggregate information to other parties.

**2.4** Your personal data may then be used for the legitimate interests of Cornerstone in order to:

**2.4.1** Provide you with information, or services that you requested from us.

**2.4.2** Allow you to participate in interactive features of our site, when you choose to do so.

**2.4.3** Ensure that content from our site is presented in the most effective manner for you and for your device.

**2.4.4** Improve our site and services.

**2.4.5** Process and deal with any complaints or enquiries made by you.

**2.4.6** Contact you for marketing purposes where you have signed up for these (see section 6 for further details).

### **3. Leaseholders & Tenants**

- 3.1** We collect details such as your name, property address, email address and telephone number for our legitimate business interests, and in order to provide you with our property management services as instructed by the developer or freeholder. We use these details so that we can contact you about matters affecting your property, including maintenance and repair work required to the communal areas of your property (which may require an emergency callout) and any service charges or ground rent due and payable.
- 3.2** In cases of unpaid service charge or ground rent, we may share your information with our solicitors as part of our debt recovery process.
- 3.3** Where you are a director of a Residents' Management Company or Right to Manage Company, we will share your personal data with professional advisers who act for the management company such as accountants, solicitors and insurers where you have asked us to contact them on your behalf.
- 3.4** We may take payments for service charge and ground rent over the phone. Please note that we do not collect or share your payment details with third party merchant services providers. You will submit your payment details direct to the merchant services providers subject to their own privacy terms. We will keep your personal data for as long as you continue to be a leaseholder in the properties and also in regard to the following:
- Customer complaints – 3 to 6 years
  - Copy correspondence – 3 years

### **4. Customers**

- 4.1** We will collect details such as name, address, email and telephone number when you order our services from us either via our site or we will use this information to process your order and comply with our contractual obligations.
- 4.2** In order to perform our contract with you, we may also need to share personal data with third parties such as payment providers and postal service organisations to assist in the delivery of goods or services you have ordered.
- 4.3** We may also advertise your feedback on our website and marketing materials (subject to obtaining your prior consent where necessary).
- 4.4** We will retain your information as long as we require this to provide you with the goods or services ordered from us.
- 4.5** Where you have subscribed to receive marketing correspondence from us we will keep personal data until you unsubscribe from receiving such correspondence from us.

### **5. Suppliers**

- 5.1** We will collect details such as your name and company email address in order to contact you about goods or services ordered with you and to place further orders. We will keep the personal data for as long as we require your goods and services.
- 5.2** Suppliers all operate under the strict Cornerstone code of conduct, ensuring that they maintain a duty of care when processing and storing information relating to the residents within the properties Cornerstone manages.

### **6. Marketing**

- 6.1** Your personal data may be used for our legitimate interests in order to provide you with details about our goods, services, business updates and events which we think may be of interest.

**6.2** You have the right to opt out of receiving this marketing information at any time. To opt out of receiving such information you can email us or call us directly providing us with your name and contact details.

## **7. Legal Basis For Processing Your Personal Data**

**7.1** We are required to notify you of the legal basis upon which we process your personal data and ensure that it is in accordance with data protection legislation. Your personal data is processed for the following reasons:

**7.1.1.** For performance of a contract we enter into with you.

**7.1.2.** Where necessary for compliance with a legal obligation we are subject to.

**7.1.3.** For our legitimate interests (as described within this policy).

## **8. Disclosure Of Personal Data To Third Parties**

**8.1** In addition to the third parties mentioned above, we may disclose your information to third parties for the following legitimate interests of those third parties:

**8.1.1** To staff members in order to facilitate the provision of goods or services to you.

**8.1.2** To IT software providers that host our website and store data on our behalf.

**8.1.3** To a prospective buyer of some or all of our business or assets, in which case data including personal data will also be one of the transferred assets.

**8.2** We may disclose personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms and conditions and other agreements; or to protect our rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

**8.3** We will not sell or distribute personal data to other organisations without your approval, or transfer your personal data outside the European Economic Area.

## **9. Data Security**

**9.1** It is important that the personal data we hold about you is accurate and current. Please keep us informed if the personal data we hold about you changes.

**9.2** You can also ask us to undertake the following:

**9.2.1** Update or amend your personal data if you feel this is inaccurate.

**9.2.2** Remove your personal data from our database entirely.

**9.2.3** Send you copies of your personal data in a commonly used format and transfer your information to another entity where you have supplied this to us. We process this electronically with your consent or where necessary for the performance of a contract.

**9.2.4** Restrict the use of your personal data.

**9.3** We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes.

**9.4** Data protection legislation may allow or require us to refuse to provide you with access to some or all the personal data that we hold about you or to comply with any requests made in accordance with your rights referred to above. If we cannot provide you with access to your personal data, or process any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

- 9.5** Data protection legislation gives you the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided. You also have the right to access information held about you and for this information to be provided in an intelligible form.
- 9.6** If you would like a copy of some or all of your personal information, please send an email to [info@cornerstone-pm.co.uk](mailto:info@cornerstone-pm.co.uk) for the attention of the Directors of Cornerstone Property Management Ltd. In certain circumstances we reserve the right to charge a reasonable fee to comply with your request.
- 9.7** Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential and request that this is not shared with any other parties.
- 9.8** Information you provide to us is shared on our secure servers. We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.
- 9.9** Although we will do our best to protect your personal data, the transmission of information via the internet is not completely secure. Consequently we cannot guarantee the security of your information transmitted to our site and any transmission is at your own risk.
- 9.10** Please send any requests relating to the above to our Administration Department at [info@cornerstone-pm.co.uk](mailto:info@cornerstone-pm.co.uk) specifying your name and the action you would like us to undertake.
- 9.11** Where you have provided your consent to the collection, processing and transfer of your personal data, you have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, please contact us at [info@cornerstone-pm.co.uk](mailto:info@cornerstone-pm.co.uk) for the attention of the Directors of Cornerstone Property Management Ltd.

## **10. Changes to Our Privacy Policy**

- 10.1** We reserve the right to update this privacy policy at any time, and any changes we make to our privacy policy will be posted on this page. We will notify you if there are any changes to this policy that materially affect how we collect, store or process your personal data.
- 10.2** If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose.
- 10.3** We may process your personal data without your knowledge or consent where required by applicable law or regulation.