

## **PRIVACY NOTICE – BLUESTONE (SHROPSHIRE) LIMITED**

This Privacy Notice provides information on how Bluestone (Shropshire) Limited (hereafter called Bluestone, Bluestone Lettings, We, Us) and any third party providers collect, use, secure, transfer and share your information. We provide a residential letting and property management service, including marketing services via our website and other means and property management to include leasehold and estate management services. We are regulated by the Royal Institution of Chartered Surveyors who require strict compliance with ethics and professional standards.

### **1.Types of Information Collected**

Bluestone Lettings will typically collect all or some of the following information

- First name, middle name, surname, previous name
- Date of birth
- Present address, residential status, previous address, landlord details
- Nationality
- NI number
- How many dependants, marital status, gender
- Copies of primary ID
- Copies of address ID
- Bank statements, credit card statements, mortgage statements
- Employers name, employers address, employers contact details, copies of payslips, self-employed accounts, accountant details, salary
- Previous employers name, previous employers address, previous employers contact details, copies of payslips
- Email address phone numbers, IP address, cookies
- Criminal offences/convictions
- Bank details, bank account details, credit card details
- Copies of mortgage statements
- Copies of buildings insurance
- Solicitor name, solicitor address, solicitor contact details

#### **1.1 Methods of Collections**

In the general conduct of business, Bluestone collects information relevant to the services being sought across its services from:

- Yourself
- Next of kin
- Spouse, partner, family member
- Business associates
- Employers
- 'trusted' sources to include
  - Government, land and police registers
  - Credit and default agencies

- Financial institutions (banks, building societies, loan agencies, mortgage companies, credit card companies)
- Insurance companies
- Through consent to third parties disclosing information about you to us that they have collected.

Such information will generally be collected directly via the use of any of our standard forms, or standard forms of credit reference agencies, in our office in Church Stretton, through a telephone conversation with you, over the internet, and via email.

In addition you may choose to submit information directly to us via various methods including:

- In response to marketing or other communications
- Through social media
- In connection with an actual or potential business relationship with us.
- You may also agree to third parties disclosing information about you to us that those third parties have collected.

We and our service providers and partners collect certain information by using automated means such as cookies and web beacons, when you interact with our mobile applications, or visit our websites or other digital assets. The information we collect in this manner may include IP address, browser type, operating system, referring URL's and information on actions taken or interaction with our digital assets.

'Your Rights and Choices' section of this Privacy Notice specifies your ability to opt out or limit the usage of information collected.

## **1.2 Purposes of Collection**

Generally we will collect, use and hold your information for the following purposes:

- Assessing applications for and providing our residential letting and property management services
- Conducting business and developing relationships with Bluestone
- Credit checks, Processing payments/transactions including accounting, authorisation, clearing, chargebacks, auditing, billing, reconciliation ,collection, complaints, enquiries, related dispute resolution activities.
- Protection against and prevention of fraud, unauthorised transactions, money laundering, tax evasion, claims, integrity, compliance and security of business processes
- Provide, administer and communicate with you information about Bluestone services, offers and promotions
- Operate, monitor, evaluate and improve our services, websites, mobile applications, other digital assets and business for the purposes of developing new products and services, managing communications, assessing effectiveness and optimisation of advertising, assessing the functionality of our websites, mobile applications and other digital assets

- Enforce Bluestone agency agreements, terms and conditions, other legal rights as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over Bluestone;
- Comply with industry standards and Bluestone policies;
- Compliance with Anti Money Laundering Regulations

### **1.3 Lawful basis of processing**

- Bluestone Lettings process your information under the following lawful bases:
- Performance of a contract – where you enter into a contract with Bluestone and we need to process your information as part of this contract;
- Legitimate interests: some information is processed by Bluestone as part of its legitimate interests which include fraud, due diligence, network and information security, suppressions and managing opting out of communications, profiling, direct marketing, monitoring, web analytics, cloud storage, updating customer details, lettings, and other core services provided by the data controller;
- Consent – where we process information under consent we will seek your clear and unambiguous consent prior to processing your data.

## **2. Information we share**

We do not sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- Tenant referencing agencies
- Landlords and landlord associates
- Other estate agents and landlords requesting references with your written consent
- Contractors and other property maintenance services
- Gas and electrical contractors
- Utility companies
- Insurance providers
- Hosting datacentres, infrastructure, applications cloud services
- Government agencies including Her Majesty's Revenue and Customs (HMRC) and other relevant regulator bodies
- Local council office for purpose of collecting information for council tax purposes

We require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or to comply with legal requirements.

Additionally we may share information about you, if required legally, to prevent harm or financial/reputation loss, for investigation of suspected or actual fraudulent or illegal activities.

On websites, features can be accessed where we partner with other entities that are not affiliated with Bluestone. These include property portals, social networking, geo-location tools etc., are operated by third parties who may use or share personal information in accordance with their own privacy policies If you use the relevant features.

Bluestone reserves the right to transfer your information in the event of a sale or transfer of our business or assets, with reasonable efforts for the acquirer to protect/use your information consistent with our Privacy Notice. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.

## **2.1 International Data Transfers**

Bluestone may transfer the personal information collected about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Privacy notice or as otherwise disclosed to you at the time the data is collected.

## **2.2 Profiling**

For the purpose of business conduct, enhancement, identification of fraud, money laundering and other potential unauthorised activities, Bluestone engages profiling activities via direct use or anonymization of sensitive personal information.

### **2.2.1 Direct Profiling**

Direct profiling is engaged for the fair and lawful purposes to provide Bluestone the ability to enforce its agency agreements, legal reporting as may be required by applicable laws, regulations, policies/standards or requested by any judicial process or governmental agency having or claiming jurisdiction over Bluestone, including but not limited to

- Background checks for existing and new clients, business partners and affiliates
- Anti-money laundering
- Credit defaulting/exposure

### **2.2.2 Indirect profiling**

Indirect profiling via anonymization of personal information is also used for preparing and furnishing aggregated data reports showing anonymised information, including, but not limited to the following:

- Compilation, analyses, analytical and predictive models and rules, and other aggregated reports for the purpose of advising our partners/affiliates and servicing institutions and other customers regarding past and potential future patterns of service usage, spending, fraud and other insights that may be extracted from this data.
- Compiling and communicating promotional and marketing information about the services that Bluestone Lettings, affiliates and other organisations that we have affiliations with have and that may be of interest to you
- Conducting market research

Facilitating our internal business operations including the fulfilment of any legal or regulatory requirements

## **3. How long do we keep your information for?**

We will keep information for a reasonable amount of time in order to perform the purposes listed above

We only keep your information for as long as necessary. We generally keep personal information for seven years after last contact with you. However Bluestone reserves the right to keep the information for longer if we feel that this is in the legitimate interests of Bluestone.

#### **4. Your rights and choices**

Your rights regarding the sensitive/personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information and how we communicate with you.

##### **4.1 Access and correction**

You may have the right to:

- Obtain confirmation that we hold personal information about you
- Request access to and receive information about the personal information we maintain about you
- Receive copies of the personal information we maintain about you.

The right to access personal information may be limited in some circumstances by local law requirements.

To exercise these rights, please contact us as set out below:

##### **4.2 Update and correct inaccuracies in your personal information**

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate;

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to information we hold about you.

##### **4.3 Object to the processing of your personal information**

If you would like to object to any processing of your information by Bluestone you can contact us outlining what processing of information you would like to object to.

Have the information blocked, anonymised or deleted

If you would like us to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like deleted, blocked or anonymised. To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us as specified in the 'How to contact us' section below.

#### **4.4 Opting out of processing**

You can opt out of collection of personal information by automated means, e.g. when visiting our website or third party websites and interacting with our adverts, by using the Cookie Consent tool displayed in the website (the browser you use may provide options on how to opt out of receiving certain types of cookies). However without cookies you may not be able to use all of the website features and/or online services.

#### **4.5 Withdrawal of consent**

If we obtain your information by consent, you have the right to withdraw that consent.

If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information.

Bluestone will apply your preferences going forward. Doing so will mean that you cannot take advantage of certain Bluestone services, offers and promotions.

The right to consent removal may be limited in some circumstances by legal requirements and you will be informed appropriately.

#### **4.6 The right to lodge a complaint**

If you have a complaint about how Bluestone has handled your personal data, subject access request or right to erasure, you have a right to lodge a complaint with the supervisory authority, in this case the ICO, whose contact details are provided below:

Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### **5. How to contact us**

If we fall short of your expectations in processing your personal information or you wish to make a complaint about a breach of your personal information, applicable privacy laws, principles or have a concern about Bluestone privacy practices; and/or would like to access and/or update information or preferences you provided us, you may contact us in the following ways:

Call us on 01694 730003  
Or email us at [hello@bluestonelettings.co.uk](mailto:hello@bluestonelettings.co.uk)  
Or write to us at

Data Controller  
Bluestone Lettings  
32 Sandford Avenue  
Church Stretton  
Shropshire, SY6 6BW

To assist us in responding to your request, please give full details of the issue. We will review and respond to all complaints within a reasonable timescale.

If we cannot for lawful reasons complete your request, we will explain this to you to the extent that we lawfully can.

## **6. How we protect personal information**

The security of your personal information is very important and Bluestone is committed to protecting the information we collect and maintain. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

We store personal information only for as long as it is necessary for the fulfilment of the purpose for which the information was collected, unless otherwise required or authorised by applicable law. We take measure to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected.

## **7. Personal data breaches**

In order to comply with applicable aw, Bluestone has implemented procedures to detect, report and investigate personal data breaches. A data breach is defined by the Information Commissioner's Office (ICO) as

'A breach of security leading to the destruction, loss, alteration, unauthorised disclosure, or access to personal data'

The ICO will be informed of all data breaches which present a high risk to our client and customer's rights and freedoms and in line with applicable law, a notifiable breach will be reported within 72 hours of us becoming aware of it. The individual(s) will also be informed.

## **8. Updating this Privacy Notice**

We will update this Notice periodically and so we suggest that you review it at regular intervals. Where the privacy notice is substantially altered we will endeavour to inform you directly about these changes.

**May 2018**