

Hillcrest Estates Privacy Policy

Who is processing your personal data?

We are **Hillcrest Estate Management Limited** of Vantage Point, 23 Mark Road, Hemel Hempstead, Hertfordshire, England, HP2 7DN (registered in England & Wales no: 01943394). We are registered with the Information Commissioner with registration number Z9772031.

What information do we collect from you?

In our role as Managing Agents for each block of flats or other property we manage

- We collect contact details of the Directors or other persons representing our clients (e.g. Freeholders, Superior Landlords, Landlords, Head Lessors or Management Companies).
- We collect the full names, address and other contact details (addresses, email addresses, date of birth & contact numbers), passport in some cases or any other legal form or identity of the Leaseholders of each flat in the block and of any subtenant(s) of that Leaseholder.
- We keep records of the ground rent, service charge, insurance and reserve/sinking fund accounts for each flat.
- We keep records of any issues relating to the flat, including repairs, insurance claims, complaints and disputes, alterations, assignments and subletting.
- Some properties operate closed circuit television (CCTV) at the entrances and common parts.

Why do we collect this information?

To manage and maintain the block on behalf of our clients.

Our legal bases for processing for the personal data as agent for our client are:

- Performance of our management contract with our client.
- Performance of the contracts contained within each lease.
- Our client's legitimate interests in managing and maintaining the block for the benefit of all lessees.
- Compliance with our client's legal obligations as a landlord or management company of a residential block.
- Compliance with our client's and our legal obligations in relation to company secretarial matters, accounting records and taxation.

What do we do with this information?

We will process the personal data to achieve the above purposes as follows:

- collecting rent, service charge, insurance and reserve/sinking fund contributions;
- dealing with any issues relating to flats, including repairs, insurance claims, complaints, alterations, assignments and subletting;
- providing company secretarial services, including the appointment and resignation of directors and transfer of shares or changes of memberships in any freehold or management company;
- serving the appropriate demands and notices;
- instructing surveyors, contractors and solicitors;
- maintaining the security of the block: and
- sending information to Companies House, solicitors, mortgagees and other official institutions and Government bodies

Who might we share this information with?

- We will give lessees' contact details to surveyors or contractors who may need to access their flat to inspect or carry out works.
- We will instruct a debt collection agency and/or solicitors to recover any arrears of rent, service charge and/or reserve/sinking fund contributions that may be due.
- We may instruct solicitors to pursue any legal claims in relation to flats or any disputes with neighbours.
- CCTV footage may be disclosed to the police if a crime is being investigated.
- If our client instructs new managing agents, or we sell our business to another company, we will transfer our records in relation to the block to them so they can continue to provide the services.
- The accounts department will provide information to the DWP (Department for Work and Pensions and the HMRC (Her Majesty's Revenue and Customs), in relation to the Leaseholders' expenses or for tax purposes
- We provide solicitors / re-mortgage companies and mortgagees in possession with managing packs in relation to the sale or re-mortgage of the Leasehold flats
- In relation to the sale of the flats the seller's solicitors forward the information to the buyer's solicitors.

How long do we keep your information?

- Records of ownership of flats and company registers are kept indefinitely (including records of alterations, consents and breaches of the terms of the Lease)
- Records in relation to payments and maintenance issues are kept for 7 years.
- CCTV footage is retained for a short period agreed with our client before being recorded over, unless an incident is being investigated or it is retained as evidence.

How can I access the information you hold about me?

Your rights as a data subject:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right to object to the legal effects of automated processing or profiling. We do not carry out automated processing or profiling.
- **Right to judicial review**: in the event that we refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined [below](#).

All of the above requests will be forwarded on should there be a third party involved (see "Who might we share your information with?" above) in the processing of your personal data.

If you wish to make a complaint about how your personal data is being processed by us, or how your complaint has been handled, you have the right to lodge a complaint with us (contact Adam Coombs at adam.coombs@hillcreststates.co.uk) or directly with the Information Commissioner's Office as our supervisory authority (see ico.org.uk/concerns).