

Data Protection Policy

Policy information	
Organisation	365CPS.com LTD and associated companies (ICO Registration Number: ZA237122)
Scope of policy	This policy refers to all parties sharing personal information with us. This includes tenants, contractors and suppliers.
Policy operational date	25th May 2018
Policy prepared by	Celine Goddeeris
Date approved by Board/ Management Committee	25th May 2018
Policy review date	25 May 2021

Introduction	
Purpose of policy	This policy was created in accordance with the new GDPR regulations taking effect on 25 th May 2018. Our company data protection policy refers to our commitment to treat information of our clients and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.
Types of data	As part of our operations, we need to collect and process personal information from our clients. This information is collected in a transparent way. This includes: <ul style="list-style-type: none"> - your full name - your contact details such as private phone number and email address - a copy of your current passport or any other form of ID - information on your previous tenancy and contact details of your previous Landlord and/or a reference letter from your employer.

	<p>As a company, we have a legal duty to ensure our hire contractors are qualified to complete the job at hand. We will ask all our contractors to fill out a questionnaire stating general company information, accreditation, health and safety policy, employees competencies and insurances.</p> <p>This information will be accessed by the company within its legal and moral boundaries.</p>
<p>Policy statement</p>	<p>The new EU General Data protection (GDPR) regulations comes into force on the 25th of May 2018. Following the change in the law, 365CPS.com LTD has amended its policy statement. As part of our operations, we need to collect and process some information. This information is collected in a transparent way with our clients', contractors' and partners' consent.</p> <p>At 365CPS.com LTD we do our utmost to store personal information appropriately and safely, with an access strictly limited to the management. The management is trained to handle these records safely and act confidently.</p> <p>365CPS.com LTD also recognises the rights for individuals:</p> <ul style="list-style-type: none"> - to be informed - have access to their information - to make rectification - to erase their record - to restrict processing - to data portability - to object - to automated decision making and profiling <p>In the event of a personal data breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, 365CPS.com LTD will take the necessary measures to evaluate the extend of the security breach promptly and, if required, will notify ICO.</p> <p>A breach of data protection guidelines will invoke disciplinary and possibly legal action.</p>
<p>Key risks</p>	<p>We consider the risk of a personal data breach as low as all personal data collected from our customers, contractors and partners are stored on paper file in a secured office where only 2 persons from the management team have access. We encourage our customers to post completed forms bearing personal information instead of sending them by email.</p> <p>We do not ask nor store sensitive data.</p>

Responsibilities

The Board / Company Directors	Mr Dino Johnson
Data Protection Officer	Mr Dino Johnson
Specific Department Heads	N/A
Employees & Volunteers	All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.
Enforcement	A breach of data protection guidelines will invoke disciplinary and possibly legal action. 365CPS.com LTD provides regular training on Data Protection to the persons handling personal records. This is done via regular management meetings. All personal data breach should be reported to the management who will then make an assessment in order to establish if the breach causes a risk to people's rights and freedoms. If the risk is present, the DPO will notify the Information Commissioner.

Security

Scope	At 365CPS.com LTD, we want to ensure that we offer the highest level of security to our clients, partners and contractors. To do so, we have reduced to a minimum the content of personal data information online. The personal information which is handed to us by email will be printed off upon reception and stored away in our secured office. The email will then be deleted. We try and encourage our clients, partners and contractors to send us all personal data by post instead of email. We do not store personal data or credit card on any of our website.
Setting security levels	Low
Security measures	Email is password protected with special characters, punctuation signs, numbers and capitals. Passwords are changed once a month to prevent hacking.
Business continuity	No computer backup. We keep printed copies of forms containing personal data on a printed paper format. We keep current clients records for 7 years after their moving date. Personal data on failed applicants are destroyed after 6 months.

Specific risks	<p>The main risk would be to confirm the client's identity when asking for a copy of his/her records. 365CPS.com LTD, therefore, requires a formal signed letter from the concerned client to be sent by post to our office address (please refer to Right of Access - Procedure for granting access).</p> <p>Upon receiving the letter, we will write back to our client asking him/her to complete a verification form and include two forms of identifications and return them to our office address by post.</p>
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Data recording and storage	
Accuracy	<p>In the case of a joint tenancy, 365CPS.com LTD may gather the new tenant's contact details via a third party. Even though we prefer to receive this information over the phone this is, sometimes, done via email. Upon the reception of the email, we will contact this person to ensure he/she is aware of his/her contact details being passed on to our company. We will then carry out our operations with the concerned person's written consent.</p>
Updating	<p>From time to time, we may contact our clients to ensure their contact details are still accurate. We also encourage our clients to contact us as promptly as possible should their contact details change during their tenancy so that we can contact them if needed.</p> <p>CVs are destroyed within 6 months of reception unless we are given express permission from the candidates to keep them for a longer period of time.</p>
Storage	<p>Documents containing personal data such as pre-tenancy forms, copies of ID and contracts are kept in 365CPS.com LTD secured management office.</p>
Retention periods	<p>Current clients records are kept for 7 years. Personal data on failed applicants are destroyed after 6 months.</p>
Archiving	<p>Printed documents are archived by year, in a lockable cabinet. Documents are carefully shredded and disposed of by an authorised person once the retention period has ran out.</p>

Right of Access	
Responsibility	Celine Goddeeris
Procedure for making request	<p>365CPS.com LTD recognises its client's right to access their information. Clients can ask for a copy of the information we hold about them, free of charge, by posting a formal signed letter to our office address (please refer to Right of Access - Procedure for granting access).</p> <p>Upon receiving our client's request, we will contact the concerned person by post, phone or/and by email to verify that the request for personal information did come for him/her. We will send him/her a written verification to complete and return by post with two form of identification. We try to respond to all legitimate requests within one month.</p>
Provision for verifying identity	<p>365CPS.com LTD will require two forms of identifications such as:</p> <ul style="list-style-type: none"> - Current UK/EEA passport - UK driving licence - Financial statement issued by bank, building society or credit card company - Utility bill for supply of gas, electric, water or telephone
Charging	<p>No fee required - with some exceptions</p> <p>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 admin fee if your request is clearly unfounded, repetitive or excessive.</p>
Procedure for granting access	<p>In writing by post to our office address:</p> <p>365CPS.com LTD 3 Littlestone road Littlestone New Romney Kent TN28 8LN</p> <p>Upon receiving your letter, we will send you a form to complete to verify your identity. Once we have received your completed form and the two required identification documents. 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.</p>

Transparency

Commitment

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances :

Performance of Contract this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

We may have to share your personal data with the parties set out below:

- local council
- gas and electric engineers to carry out mandatory checks on the property

- professional advisers including lawyers, bankers, accountants who provide consultancy, banking, legal and accounting services.

- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

The right to request a copy of the personal data which we hold about you;

1 - The right to request that we correct any personal data if it is found to be inaccurate or out of date;

2 - The right to request your personal data is erased where it is no longer necessary to retain such data;

3 - The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;

4 - The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable (i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);

5 - The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;

6 - The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public

	<p>interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).</p> <p>If you wish to exercise any of the rights set out above, please contact Celine Goddeeris.</p>
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Lawful Basis	
Underlying principles	<p>As part of our operations, we need to collect and process some information. This information is collected in a transparent way. The information gathered from 365CPS.com LTD will be used to:</p> <ul style="list-style-type: none"> - confirm your identity - contact your previous Landlord or current employer in order to get a reference from your previous tenancy or current job - contact you by phone or by email - inform you of safety visits from our chosen engineers (gas/ electricity) - give future references
Opting out	<p>As part of our operations, we need to collect and process some information. This information is used to confirm your identity, eligibility as a tenant of one of our properties and to enter into a rental agreement with you.</p> <p>As a tenant, we need to be able to contact you in case of an emergency, a repair or a safety visit of the rented property (gas and electricity safety reviews).</p> <p>We will not use your contact details for marketing purpose. Opting out can only be offered at the end of your tenancy once you have left the property.</p>
Withdrawing consent	<p>By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for a period of 7 years after they cease being customers for tax purposes.</p> <p>In some circumstances you can ask us to delete your data: please refer to the above part entitled "Commitment" for further information.</p>

Employee training & Acceptance of responsibilities

Induction	All employees who have access to personal data have their responsibilities outlined during their induction.
Continuing training	Additional training is done during management meetings.
Procedure for staff signifying acceptance of policy	Employees who have access to personal Data have accepted and signed the Personal Data policy.

Policy review

Responsibility	Celine Goddeeris
Procedure	Management of 365CPS.com LTD will need to accept every review of this policy.
Timing	Next review in 6 months time (May 2019)