

TENNANTS PRIVACY NOTICE

(MAY 2024, VERSION NO 1.6)

Who we are

Tennant Property Lettings Limited, trading as 'Tennants', is an independent landlord's agent based in Eastbourne specialising in residential lettings since 1970. We are dedicated to providing a high standard of service to our landlords and tenants; and are committed to protecting and respecting your privacy and the safekeeping of your personal information.

Details of our registration with the Information Commissioner's Office, as well as full company and contact details can be found at the bottom of this privacy notice.

This policy explains how and why we need your personal information. If you follow a link to an external site we have no control over the information posted there and you should refer to their privacy policy.

If you are an employee, please see our internal Employee Privacy Notice.

Why we need your information

In order to support both landlords and tenants we must process certain personal data. We will use personal information collected:

- To reply and manage any enquiries you make to us in writing or verbally.
- To manage our relationships with landlords and tenants.
- To provide our full range of products and services including rental and renting of properties, advertising, property management.
- Compliance with legal obligations in relation to property lettings, such as credit reference and anti-money laundering checks, 'Right to Rent' checks, obtaining personal references, managing rental payments, deposits and guarantees.
- To carry out any contractual and legal obligations in the interests of both clients and Tennants.
- To perform direct and electronic marketing in order to promote the organisation.
- To conduct research about your opinion of our existing or planned products or services.
- To contact you on behalf of other business partners about offers or services we believe may be of interest to you (we will not disclose your personal data without your consent).
- To allow us to manage recruitment and employee data.
- To allow us to manage our relationship with other organisations and businesses, such as suppliers, tradespeople, IT and communication services.
- We will also process your data to comply with any legal obligation to which we may be subject, and to obey any Court Order.

What Information we capture

We are required to collect and process different categories of personal data depending on our commercial relationship with you. Depending on the enquiry you have made, the service that we are delivering to you or the business relationship we have, we may process some or all of the following information.

Standard Category Data

Standard category data is information which on its own, or when combined with other information can identify a specific individual.

Type of Data	Tenants	Landlords	Candidates & Employees	Suppliers & Business Partners
Full name including any previous names	Y	Y	Y	Y
Contact details including current and previous home and, or work addresses, telephone numbers and emails.	Y	Y	Y	Y
Identification documents as required by law, for example, driving licence, passport, utility bills, birth or marriage certificates. This will include photographic ID.	Y	Y	Y	Y
Gender and Marital status.	Y	Y	Y	
Occupation	Y	Y	Y	Y
Employment history and current job status	Y		Y	
Length of time in current occupation and salary/income information.	Y		Y	
Financial information, including your bank account details, debit card details, and other payment details.	Y	Y		Y
Details of benefits, funds available, savings, investments and property ownership.	Y	Y		
Details of third-parties, for example for guarantors and witnesses.	Y	Y		
Contractual documentation.	Y	Y	Y	Y
Insurance documentation.	Y	Y		Y
Lifestyle choices, for example smoking as this may invalidate a tenancy agreement.	Y			
Images and video data via security cameras located on the premises.	Y	Y	Y	Y
Photographs <i>NB. Photographs of the interior of properties will be taken during tenancy visits, but this is not classed as personal data.</i>			Y	Y
Social media posts such as Facebook, LinkedIn, Twitter etc. <i>If we do this it will be in line with a social media policy.</i>	Y	Y	Y	Y
Website information, including IP Address, details of your device, pages you visit including date time and duration of visit, geo-location data, details of searches made.	Y	Y	Y	Y

Special Category or Sensitive Data

Special category data concerns those characteristics or behaviours which people would consider private, or against which a person may be discriminated. We do not collect the following information as standard, only when it is necessary to comply with a legal obligation, or to support or assist you, for example if a person has specific access requirements, or is engaged with a dispute with a neighbour.

Type of Data	Tenants	Landlords	Candidates & Employees	Suppliers & Business Partners
Health Information	Y	Y	Y	Y
Sexuality or Sexual Orientation	Y		Y	
Ethnicity			Y	
Religion or philosophical belief	Y		Y	
Actual or alleged criminal records or activity	Y	Y	Y	Y

Above are the main classifications of data which we will record about you, however we may process other personal information which you provide to us, or which is necessary for us to provide our service to you.

We never knowingly target our services directly to children although we may process some essential information regarding children if it is necessary to support a tenancy or in the case of a safeguarding matter.

How we obtain your information

In most cases the personal data we hold has been provided directly from yourself, a friend or family member. We may receive information from local authorities, other estate agents, letting sites and managing agents.

Information on referees is shared with us by applicants, landlords and candidates for employment. In the case of background and credit checks, and criminal record searches, limited additional information may be provided by third parties. Suppliers and partner companies providing maintenance and repair services may also feedback information to us following engagement with tenants and landlords.

Why we process your Information and for how long it is retained

We only process your personal data in order to provide our goods and services to our tenants and landlords, and to manage and run the company. We are obliged to inform you under what lawful basis we rely upon to process your information, and for how long the information will be retained; you can find out more about these technical lawful bases on the ICO website [here](#).

Processing is performed for the following reasons:

Purpose of processing	Lawful Basis	Retention period
To operate our website.	Legitimate interests	See cookie policy
To provide our full range of products and services to you.	Consent, contractual and legal obligation.	7 years after our relationship ends.
Carry out any contractual and legal obligations, for example anti-money laundering checks and Right to Rent checks as required under s.22 of the Immigration Act 2014.	Contractual and legal obligation.	7 years after the search is performed, or 7 years after our relationship ends, whichever is the latter.
To administer our business and promote our interests.	Legal obligation and legitimate interests.	Timescale will vary dependant on legal obligation.
Financial transactions.	Contractual and legal obligations.	7 years from transaction.
Tenant's deposit.	Legal obligation	7 years after the deposit is returned.
To manage enquiries and deliver the response, product or service you have requested.	Consent, contractual obligation and legitimate interests.	2 years after enquiry or 7 years after our relationship ends, whichever is the latter.
To inform you of other products or services available from us (Marketing).	Consent and legitimate interests.	2 years after signup or ongoing if you continue to interact with us (open our emails).
To undertake or defend a legal claim.	Establishment, exercise or defence of legal claims.	Will depend on legal statute of limitations.
To conduct research concerning our existing products or services or possible new offerings that we may be considering.	Legitimate interests.	Research studies are anonymised and so kept indefinitely.
Recruitment of new staff.	Consent, legitimate interests and legal obligation.	Unsuccessful applications – 6 months after campaign finished.

We will also process your data to comply with any legal obligation or Court order to which we may be subject.

How we keep your information safe and where we store your information

As with most companies, Tennants utilise the services of third-party companies to assist us in the processing of personal data, for example, our emails and files are hosted within the Microsoft 365 cloud, and an independent technology company built our smartphone app and stores our data.

These companies are called Processors, and before we utilise any third-party Processor, we perform robust due diligence on them to ensure that they comply with all relevant data protection legislation and can keep your information safe. Wherever possible your personal information will be stored in servers located within the UK or EEA. However, we currently have one Processor in the US and they facilitate email broadcast communications for us. Contractual documentation is in place with all third parties with whom we regularly share data, and we remain responsible for the security and lawfulness of all data managed on our behalf by data Processors.

We have in place a range of technical and organisational measures to keep our systems and your information safe, and we are continually looking to improve the security on our systems.

With whom we share your information

We do not sell, rent, or otherwise share personal data with any third parties except as expressly described in this Privacy Notice or with your prior consent.

To facilitate your enquiry, provide our goods and services to you, comply with our statutory obligations, and carry out our normal business practices, it is necessary to share your information with authorised individuals within Tennants. Only information necessary to fulfil their job role is made available to them. We also need to share information with third party organisations as set out below, but they will only process your information within the confines of current data protection legislation.

Landlord and Tenancy services

- Reference agencies.
- Tenancy deposit scheme providers (TDP).
- Maintenance contractors.
- Utility suppliers.
- Insurance providers.
- Inventory providers.
- Local Authority (council).
- Statutory authorities such as HMRC, Police etc as required by law.

General and business administration purposes

- IT service providers.
- Software and cloud storage providers.
- Web-hosting companies including site analytics providers.
- Accountants, solicitors and professional advisors.
- CCTV monitoring partners.

We would also share with third parties in connection with the consideration, negotiation, or completion of a transaction in which we are acquired by or merged with another company or association, or we sell, liquidate, or transfer all or a portion of our assets. If we are the subject of a merger or takeover then your personal information will be passed to the new entity, but will only be used for the same or similar purpose you gave it for. You will be informed of the change and given the opportunity to withdraw consent if that is the lawful basis upon which your data is being processed.

Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Please see our full [cookie policy](#) for details.

Your rights

Under UK data protection legislation, you have a number of rights in relation to the processing of your personal data. Following is a summary of your rights, you can read more about them in full on the ICO [website](#), to activate any of your rights just simply contact us using any of the channels at the end of this policy.

You have:-

- A right of access to a copy of the personal information we hold about you.
- A right to object to processing that is likely to cause or is causing you damage or distress.
- A right to prevent us using your personal information for direct marketing purposes.
- A right to object to decisions being taken on you by automated means, for your information, here at Tennants we do not make any automated decision on you.
- A right to have inaccurate or incomplete personal data rectified or completed.
- A right to ask for your personal information to be blocked, erased, forgotten or destroyed.
- A right to claim compensation for damages caused by a breach of the legislation.
- The right to withdraw consent at any time.
- The right to lodge a complaint with a supervisory authority.

You are perfectly within your rights to ask us to comply with any of these rights, but there may be legal reasons why we are unable to fully comply with your request, if this is the case, we shall inform you of the reasons.

Contact and legal details

Tennants, is the trading name of Tennant Property Lettings Limited, a private company registered in England No. 04453368 and our registered office is Railview Lofts, 19c Commercial Road, Eastbourne, BN21 3XE.

For the purpose of the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) Tennants is the data controller of your personal data. We are registered the UK Information Commissioner's Office with the registration number: Z8790481

For data protection issues, please email contact us at:

Address: 22 New Upperton Road, Eastbourne, BN21 1NU, UK

Email: enq@tennants.co

Tel: 01323 726687

Complaints

We hope that we have dealt with your enquiry to your satisfaction, however, if you remain unhappy with the way that we have processed your personal information, or dealt with your enquiry, you may contact the UK data protection authority whose details are below:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire, SK9 5AF

Helpline: 0303 123 1113