

# GDPR Privacy Notice

## Introduction and background

The purpose of this privacy notice is to outline how Homeground Management Limited has established measures to protect your privacy and information rights.

## Your rights

We recognise that you have rights as a 'data subject', and that we have an obligation to uphold these.

This privacy notice aims to outline how we maintain these rights. In particular, it outlines:

- How we collect and process your information
- Why we do this
- How you can exercise your rights
- Who to contact in the event you're unhappy with our performance.

In various circumstances, your rights are as follows:

Right	Explanation
Right to be informed	This encompasses the obligation for us to be transparent in how we collect and use your personal data.
Right of access	You have the right to access your personal data and supplementary information.
Right to rectification	If the information we hold about you is inaccurate or incomplete, you can request that we correct this.
Right to erasure	You can request that we delete or remove personal data where there is no compelling reason for us to continue processing
Right to restrict processing	You have the right to request that we cease processing your data, if: <ul style="list-style-type: none"> <li>• you consider it inaccurate or incomplete;</li> <li>• you object to processing and we are considering whether we still have a legitimate interest to process it.</li> </ul>
Right to data portability	<ul style="list-style-type: none"> <li>• Where you have consented to our processing your data, or where the processing is necessary for us to deliver a contract, you can request a copy of that data be provided to a third party in electronic form.</li> </ul>
Right to object	You have the right to object to our processing under certain circumstances. For example, you can object to: <ul style="list-style-type: none"> <li>• direct marketing (including profiling); and</li> <li>• processing for purposes of scientific/historical research and statistics</li> </ul>
Rights relating to automated decision making including profiling	<p>Where we apply automated decision making, we must</p> <ul style="list-style-type: none"> <li>• give you information about the processing;</li> <li>• introduce simple ways for you to request human intervention or challenge a decision;</li> <li>• carry out regular checks to make sure that our systems are working as intended</li> </ul> <p>Information related to automated decision making is contained later in this notice.</p>

This privacy notice outlines how we are transparent in our processing. Please get in touch with us through the 'Contact Us' section to find out more or to exercise your information rights. There are circumstances in which we will decline your request, but we will explain this clearly to you.

## Information we collect

Please find below a summary of the information we hold and how we use this to deliver services to you.

Information we collect	Why we collect this	How we process this
Core leaseholder records	Our basis for processing this information is that it is necessary for us to deliver the services that you have contracted to.	We use this information to: <ul style="list-style-type: none"> <li>• administer and process billing. We will retain some billing history as a part of our corporate records, and will record our correspondence with you;</li> <li>• administer and process consents and other obligations under your lease.</li> </ul>
Leaseholder correspondence		
Leaseholder billing		
Leaseholder documentation (hardcopy)		
Finance	We process this information on our	
Payroll		

Business administration (electronic file and document storage)	employees to allow us to administer their employment and benefits.	We process this information as one would expect of a responsible employer – to pay salaries, administer benefits, and manage our obligations as an employer.
Business administration (email)		
Human resources		
Managing agent and management companies	Our basis for processing this information is that it is necessary for us to deliver the services that you have contracted to.	We sometimes need to share information with the managing agent or management company for the property.

## Transfer of data

We share data with a number of third parties in the course of delivering our services. These are summarised below:

- Our IT service provider provides offsite backup services for us.
- We use an offsite document scanning and storage facility. This allows us to make sure that our primary internal records are electronic.
- We have a firm of accountants who operate payroll on our behalf and carry out auditing.
- We use solicitors to deal with all legal aspects of our business.
- We use an insurance broker to assist with sourcing and putting in place insurance policies for the buildings which we manage. Please refer to the short form Privacy Notice from Arthur J Gallagher Insurance Brokers Limited below.
- We share data with management companies and managing agents in order to deliver the services that you have contracted to.
- We use a cloud-based HR management system, to help us administer employee records.
- We use confidential waste disposal for confidential documents.
- We have a leasing arrangement with a photocopier provider.
- We can share information with members of the Long Harbour group to support us in day-to-day business administration.
- We use the Office 365 suite provided by Microsoft to handle our email and other office automation.

## Retention of data

Homeground Management Limited retains information for seven (7) years from our point of last contact. We hold this information to support our legal and regulatory requirements. If you object to this retention, please contact us – details provided in the ‘Contact Us’ section.

## Automated decision making

Homeground Management Limited does not routinely make use of automated decision making or profiling in processing your data.

## Securing your information

Homeground Management Limited applies technical and organisational security measures in line with industry good practices such as ISO 27001. Homeground Management Limited has achieved the Cyber Essentials accreditation.

## Short Form Privacy Notice from Arthur J Gallagher Insurance Brokers Limited

Arthur J. Gallagher Insurance Brokers Limited is the data controller of any personal information you provide to us or personal information that has been provided to us by a third party. We collect and process information about you in order to arrange insurance policies and to process claims. Your information is also used for business purposes such as fraud prevention and detection, and financial management. This may involve sharing your information with third parties such as insurers, reinsurers, other brokers, claims handlers, loss adjusters, credit reference agencies, service providers, professional advisors, our regulators, police and government agencies or fraud prevention agencies.

We may record telephone calls to help us monitor and improve the service we provide. For further information on how your information is used and your rights in relation to your information please see our privacy notice at [www.ajginternational.com/Privacy-Policy/](http://www.ajginternational.com/Privacy-Policy/). If you are providing personal data of another individual to us, you must tell them you are providing their information to us and show them a copy of this notice.

## Contact Us

We recognise that you may have questions on how we process and/or store your data, or may want to change either the data we hold on you or how we communicate with you in the future.

If you have any questions in respect of this notice, or would like to exercise your rights as a data subject (for example, to correct data or to exercise your right to access), Homeground Management Limited can be contacted as follows: [enquiries@homegroundonline.com](mailto:enquiries@homegroundonline.com) or PO Box 6433 London W1A 2UZ, marked for the attention of the Data Protection Officer.

If you are unhappy with our response to your query, or if you would like to escalate a concern, The Information Commissioner’s Office can be contacted on 030 3123 1113 or you can visit their website <https://ico.org.uk> for further details.