

#### **Data Protection Notice**

This notice explains how CSM Property Management Limited ("We/Us/Our") will use your personal data.

#### **Our Details**

We are the Data Controller for any personal data you supply to us in accordance with the General Data Protect Regulations, the Data Protection Act 2018 and any other relevant national law.

You can find this notice on our website or a copy can be provided in writing on request. If you have any queries about the use of your information you can email us on <a href="mailto:info@csmni.com">info@csmni.com</a> or you can put any queries in writing to, Data Protection Officer, CSM Property Management Limited, 60 Lisburn Road, BELFAST, BT9 6AF.

#### The data we receive

We may obtain personal data from you directly or from someone you have authorised to supply personal data on your behalf. We only will obtain data that is necessary for the performance and arrangement of your contract, for our legitimate interests and for compliance with any legal obligation. This data may consist of the following:

- Your name and contact details (including home address, telephone number and e-mail address);
- Your payment details, your payment history, details of any credit agreements and any debt management processes;
- Details of your shareholding in Management Companies;
- Details of people we may contact on your behalf in an emergency (e.g. Letting agents)

If you provide us information relating to other individuals (for example Letting Agents) you should ensure that those individuals are aware that we will use their details for the purposes outlined in this notice and direct them to this notice for full information.

# How we will use your data

Your personal information may be used by us for the following lawful purposes:

- To discharge our lawful obligations under any contract between us and a management company in which you are a shareholder;
- To investigate and resolve any complaints;
- To confirm your identity, verify the information you provide and to prevent fraud;
- To assist you with reporting claims;
- To undertake internal quality monitoring and external audits;

- To inform you of related products, services and offers from us;
- To carry out market research, statistical analysis including customer profiling to enable us to enhance our service and to develop new products;
- To seek feedback issue, issue surveys and contact you regarding the service we have provided to allow us to review and improve our customer care;
- To undertake training of our staff;

To supply information to law enforcement agencies, our regulators and other statutory bodies, when we believe it is necessary for the detection and prevention of crime and as otherwise required by or permitted by law;

- To carry out sanction, anti-money laundering, and anti-fraud controls.
- To inform you of related products and services supplied by carefully chosen 3<sup>rd</sup>

## **Data Retention**

We will only hold your personal data for as long as we are required in law and by our regulators.

# Transfer to 3<sup>rd</sup> parties and outside the UK/EU

In order to deliver our services to you, we may transfer data to the following 3<sup>rd</sup> parties:

- To Claim Handling firms and Solicitors appointed to deal with a claim made by you or against you.
- IT and system providers to facilitate electronic data transfers, the provision of technical support and system development.
- Service providers who supply IT systems, telephony, SMS, email or other messaging
- To law enforcement agencies, our regulators and other statutory bodies when we believe
  it is necessary for the detection and prevention of crime and as otherwise required by or
  permitted by law.
- Credit Reference agencies to verify your identity, prevent fraud or to determine the most appropriate payment option.
- Companies that carry-out sanction, anti-money laundering and anti-fraud controls
- Finance providers if you agree to pay by Direct Debit
- Debt Recovery firms, Solicitors and Civil Courts if required to recover unpaid funds still contractually due or funds obtained by fraud or deception.

In circumstances where we may need to process some of your information using third parties located in countries outside of the European Union, we will take all necessary steps to ensure it is adequately protected. This includes ensuring there is an agreement in place with the third parties which provides the same level of protection as required by the data protection regulations in the UK.

#### **Credit Searches**

If you consent to a credit search it will be soft search which is only visible to you (if you request a copy of your credit file at the credit reference agencies) and is not visible to other organisations. This type of credit reference check will not affect your credit file. The search will be visible on your credit report but it won't affect your credit rating as it's not an application for credit. The CRAs may add the details of our searches and information that hold about you to their records relating to you.

# Marketing

We will not share or sell your details with any 3<sup>rd</sup> party for marketing purposes without your express permission.

We will collect personal data from our website, social media accounts and if you sign up to features including document portals and apps. This will be used to manage any existing agreement you may have with us and under our legitimate interest to inform you of the products and services we offer. We will also use the data when necessary to answer a query you have made or if required to as part of a competition or activity that you have entered. Information supplied via social media may also be held or processed by the social media company in line with their own privacy policies.

We may contact you by post, telephone, email and SMS to inform you of related products, services and offers from us while you have existing products with us.

Should you wish to withdraw from marketing or amend the methods we use to contact you please contact us on 028 90245999 or writing to Customer Services, 60 Lisburn Road, BELFAST, BT9 6AF

When required we will also include an unsubscribe option on marketing SMS messages and emails that we will send that will stop any future contact. There may be a one off charge by your network provider for sending an unsubscribe SMS message to us.

# **Call Recording**

Telephone calls to us and received from us may be recorded for training and quality purposes. Call recordings may also be supplied to appropriate 3<sup>rd</sup> parties if required to investigate complaint and for the detection and prevention of criminal activity or fraud.

# **Privacy & Cookies**

A cookie is a small information file that is sent to your computer and is stored on your hard drive. Cookies are what are often used so that sites can remember who you are to save you time when you re-visit a site. Our site statistics software currently also uses cookies to allow us to measure the level of activity occurring on the site.

## **Your Rights**

You have the right to access or obtain copies of the personal information held about you by us. A response to your request will be provided to you within a month of us receiving a valid request.

You have the right to restrict processing of inaccurate information and request that we correct any inaccuracies in the information held about you. You may also have the right to erasure of data in certain circumstances.

Where we hold or process data on the basis of your consent you have the right to withdraw that consent.

If you wish to avail of these rights please write to the Data Protection Officer, 60 Lisburn Road, BELFAST, BT9 6AF or call us on 02890 245999 for more information.

### **The Information Commissioner**

You can find more details about data protection from the Information commissioner's Office at <a href="www.ico.org.uk">www.ico.org.uk</a>. You can also contact the Information Commissioner if you believe we have not complied with our obligations.