



## Privacy Notice

This notice is submitted by Orbit Property Management Limited on behalf of ourselves, our group companies, international partnerships and affiliated organisations (“Orbit”, “we”, “our” or “us”).

We recognise that when you provide us with information to enable us to deliver our services, you trust us to act and treat your data in a responsible manner. Accordingly, we have adopted a policy regarding how we collect, use and protect your personal information (“Privacy Policy”).

### Information We Collect, Why and How We Use It

We may collect personal information from you directly, or where it is provided to us from other legitimate sources, for example Tenant information provided by a Landlord who we act for.

Examples of which can include, but are not limited to, the following:

- Name
- Email address
- Postal address
- Contact numbers (such as telephone, mobile, fax)
- Date of birth
- Payment information (such as bank account details)
- Identity documentation data

The personal data we collect, process and share will be under the lawful bases specified below, and for the following purposes:

#### “Contract”

- To enable us to deliver our services as a property management agent, which requires the collection and processing of personal data for the performance of a contract (“Lease” or “Tenancy”) to which the data subject (as a “Tenant”) and our client (as a “Landlord”) are party.
- Activities necessitating the processing of personal data include collection of rents and other liabilities falling due from Tenants, plus management of lease, property and facilities matters.
- In these circumstances we may share personal data with a third-party contractor or service provider where they are, by extension of and instruction by us or our client, fulfilling an obligation under the respective contract.
- Additionally, if instructed to do so by our client; we may provide personal data to a purchaser (or their agent) upon the sale of a property we manage.

#### “Legal Obligation”

- We will collect and process personal data to comply with any statutory or regulatory requirements to which we are subject, for example to identify and verify the identity of clients.
- Where it is applicable, we share personal data in adhering to tenancy deposit protection rules.

Other circumstances that may require us to transfer or otherwise process personal information include:

- Where it is required as part of a property sale from one landlord to another company
- To protect, defend or exercise the rights and property of Orbit (including enforcing our Terms and Conditions)
- Any other circumstances as required by law and/or government authorities

## **Third-party Service Providers**

We engage third-party service providers to perform a variety of business operations on our behalf. In so doing, we may share your personal information with them. We provide our service providers with only the personal information they need to perform the services we request, and we contractually require that they protect this information appropriately and not use it for any other purpose.

## **Protecting Personal Information**

At Orbit we take the security of your data seriously. Accordingly, we have internal policies and controls in place to prevent your data from being lost, accidentally destroyed, misused or disclosed, and we limit access to personal information to those who have a business need for the performance of their duties.

## **Retention Period for Personal Information**

We will keep personal information for the period necessary to fulfil the purposes outlined in this privacy notice, unless a longer retention period is required or permitted by law. Consistent with the accounting and professional body regulations to which we are subject; there are documents we are required to retain for a period of six years.

**By providing us with your personal information, you acknowledge and agree to our processing your personal data for the purposes outlined in this notice.**

## **Your Rights**

As a data subject, you may have the following rights in respect of your personal data that we hold, to the extent that they are provided by applicable law:

- To require us to give you access to your personal data
- To require us to change incorrect or incomplete data
- To request that we restrict or suspend our use of your personal data, in certain circumstances
- To request the erasure of your personal data, in certain circumstances

If you believe that Orbit has not complied with your data protection rights, and that we have failed to remedy such a violation to your reasonable satisfaction, you have the right to lodge a complaint with the respective supervisory authority (e.g. the Information Commissioner in the UK).

For further information on how your information is used, how we maintain security of your information, your rights, or if you consider that we have processed personal data in violation of applicable law, please contact in first instance: Zoe Ford-Callender, Orbit Property Management Limited, 22 Bruton Street, Mayfair, London W1J 6QE or [zoe.ford-callender@orbitproperty.com](mailto:zoe.ford-callender@orbitproperty.com).