



Evans House Ltd
Norman Street
Warrington
Cheshire
WA2 7HW

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Evans House Limited
Privacy Policy
Last reviewed: 18 March 2018

The Short Version

- Evans House wishes to (continue to) keep a record of your name, contact details, nature of your business, and some basic financial information (e.g. if you are applying for a tenancy and we need to do a credit check).
- We will usually ask for this information directly, but will occasionally receive referrals from third parties (e.g. lettings agents and advertising sites) when you have enquired about our services.
- We collect the information because it is necessary for the legitimate interests of our business, for the compliance with an actual or proposed contract, and/or because you have previously consented.
- Your information will not be shared with any third parties without your consent. It will certainly not be used for any direct mass marketing purposes without your consent. We do however use certain online programs for accounts, file storage and CRM which means your data may be stored online with other provider (e.g. Google).
- We have taken all reasonable steps to ensure that any organisation that we share information with (e.g. Google File Storage) will not likely breach your rights, interest and freedoms.
- If you have any queries or concerns, please email enquiries@normanstreet.co.uk.

The Long Version

At Evans House, we're committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who we deal with in the course of our business (including those who visit our website), how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By communicating with us by email and/or using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to enquiries@normanstreet.co.uk or by writing to Evans House Limited, Landlord's Office, Ground Floor, Norman Street, Warrington, Cheshire, WA2 7HW. Alternatively, you can telephone 01925 411170.

Who are we?

We're Evans House Limited, Warrington's largest old mill and commercial lettings business. We are home to over 20 commercial businesses. Evans House Limited is a registered company (no. 01071119). The registered address is Norman Street, Off Orford Lane, Warrington, Cheshire, WA2 7HW.

How do we collect information from you?

We obtain information about you when:

- your personal data is referred to us by another person (for example, a tenant or lettings agent informs us that you are looking for rental space and provides a contact telephone number)
- your information is publicly listed for a service that we require, or for any other matter concerning our day to day business activities (for example, you advertise your services as a tradesman on a website, and we are looking to use your services)
- you contact us through our website
- you contact us by phone in person or by email
- your financial information (for example if you wish to apply for a tenancy, we will ask for references and evidence that you are able to pay the rent as it falls due)
- your bank details (for example, if you supply us with goods and/or services and we pay you by bank transfer)

How do we use this information?

Generally, we use information gathered for:

- enquiring as to whether you may be interested in letting a unit from us (for example, recording your name, phone number and email if you have enquired either directly or indirectly about letting a unit)
- enquiries concerning your goods or services (for example, we may enquire as to whether you can provide a quote for maintenance works or materials)
- referring you to one of our tenants as it is a service you are looking for or vice versa (for example, if you ask us to get in contact with a tenant for you, we may pass your number to the tenant for a call back; we may also pass a tenant's number to a member of the public, if they might benefit from that service)
- providing tenants with information about emergencies, important maintenance works and other matters relevant to Evans House (for example, notifications as to when fire drills will take place)
- conducting day to day tasks of the business (for example, invoicing, paying bills, maintenance, advertising units to let, recoding payments you make producing documents to carry out our obligations arising from any contracts entered into by you and us, seek your views on the goods and services we provide, notify you of changes to goods and services, and or otherwise send you information that may be of interest to you as per your request)

What type of information is collected from you?

The personal information we collect might include your:

- name
- address
- email address
- work or home address
- IP address
- information regarding what pages are accessed and when
- financial information/credit rating (for example if you apply for a tenancy with us)
- bank details (for example if we pay you by bank transfer for your services)

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example statutory company records are required to be held for 6 years). We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Who has access to your information?

We will not:

- sell or rent your information to third parties
- share your information with third parties for marketing purposes.

We may:

- pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example, we may store your data with cloud computing services for paying bills and raising invoices).
- disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.
- disclose data as required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by post, email, phone or text message unless you have given your prior consent.

You can change your marketing preferences at any time by contacting us by email: enquiries@normanstreet.co.uk or telephone on 01925 411170.

How you can access and update your information

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: enquiries@normanstreet.co.uk, or write to us at: Evans House Limited, Landlord's Office, Ground Floor, Norman Street, Warrington, Cheshire, WA2 7HW. Alternatively, you can telephone 01925 411170.

You have the right to ask for a copy of the information Evans House holds about you (we reserve the right to charge for this service where we are legally able to do so) to cover our costs in providing you with details of the information we hold about you.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely.

We are unlikely to hold any sensitive personal data about you. Any bank details you have are likely stated at the bottom of any invoices that you send to us. Any such information is protected by online banking security measures common to any high street bank. Our CRM systems are only accessible by the board of directors and access to other cloud based data storage (eg. accounting data, document storage and emails) are severely restricted to key personnel in our organisation. We also ensure all necessary anti-virus software is maintained on our machines and data is backed up with cloud based software.

Non-sensitive details (your email address etc.) are transmitted normally over the internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risk.

Use of 'cookies'

Like many other websites, the Evans House website may use cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

Transferring your information outside of Europe

As part of the services we offer and procure, the information which we hold about may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our cloud-based servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Your Rights

As an individual, you have the following rights:

- The right to be informed about how your data is being processed and why including the following information:
 - Evans House does is not required under the GDPR to have a designated Data Protections Officer. You may direct any queries concerning data protection to Evans House Limited, Landlord's Office, Ground Floor, Norman Street, Warrington, Cheshire, WA2 7HW or by email to enquiries@normanstreet.co.uk.

- The information we collect is for day to day business purposes and the advertising of our services. We are a small family run business and do not conduct mass direct marketing.
- The basis of our processing data is largely that it is necessary and in the legitimate interests of us conducting our lettings business.
- Categories of personal data held will include names, addresses, email addresses, trade names, telephone numbers, goods or services offered and financial information such as your ability to afford our services if we undertake a credit check or due diligence process.
- Organisations to may receive such data may include storage providers such as:
 - Google Drive Online File Storage (see <https://www.google.com/cloud/security/gdpr/>)
 - Dropbox Online File Storage (see https://www.dropbox.com/en_GB/security/GDPR)
 - Capsule CRM Online Software (see <https://capsulecrm.com/support/data-protection/>)
 - Xero Online Accounting Software (see <https://www.xero.com/uk/campaigns/xero-and-gdpr/>)
 - Weebly (Website) (see <https://hc.weebly.com/hc/en-us/articles/360000488108-GDPR-FAQ>)
 - Apple (e.g. iCloud) (see <https://www.apple.com/legal/privacy/en-ww/governance/>)
- Each of the above organisations has confirmed they have taken steps to comply with the GDPR. Further information can be found for each of the organisations in the links above.
- Your data will normally be retained for a minimum period of 6 years, possibly longer if we still have business dealings with you.
- You have the right to withdraw consent for your information to be processed, where relevant.
- Some of the data that we process may have come from intermediaries such as Morgan Williams LLP lettings agents or Box Pod, an online lettings service, depending upon how you came to contact us.
- We do not seek to rely on contractual or statutory grounds for you providing us with personal data where possible. Accordingly, we know of no consequence of failing to provide us with said data.
- As a rule, we do not use automated decision making procedure on the data we hold.

- The right of access to your personal data
 - If you require a copy of the personal data that we hold on you or confirmation that we process personal data held on you, please email enquiries@normanstreet.co.uk and we shall seek to respond within one month.
- The right to rectification of your personal data
 - If we hold any personal data that is incomplete or inaccurate, please email enquiries@normanstreet.co.uk and we shall seek to rectify the error within one month.
- The right to erasure of your personal data
 - You have the right to be 'forgotten' where:
 - the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
 - You withdraw consent.
 - You object to the processing and there is no overriding legitimate interest for continuing the processing.
 - The personal data was unlawfully processed (ie otherwise in breach of the GDPR).
 - The personal data has to be erased in order to comply with a legal obligation.
 - The personal data is processed in relation to the offer of information society services to a child.
 - If you feel that you have ground to request your personal data is erased from our systems, please email enquiries@normanstreet.co.uk and we shall seek to process your request within one month.
- The right to restrict processing of your personal data
 - Where:
 - You wish to contest the accuracy of the personal data
 - You wish to object to the processing
 - You consider processing is unlawful and you oppose erasure and request restriction instead
 - You consider we no longer need the personal data but the you require the data to establish, exercise or defend a legal claim

- Then we may agree to should restrict the processing rather than erase it (e.g. until you have verified the accuracy of the personal data or no longer require us to hold it).
 - If you would like us to restrict the processing of your personal data, please email enquiries@normanstreet.co.uk.
- The right to data portability of your personal data
 - If you would like any personal data transferred to another person or organisation, please email enquiries@normanstreet.co.uk and we shall endeavour to comply within one month.
- The right to object to processing of your personal data
 - You have the right to object to the:
 - processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
 - direct marketing (including profiling); and
 - processing for purposes of scientific/historical research and statistics.
 - If you wish to raise such an objection, please email enquiries@normanstreet.co.uk and we shall endeavour to process your request within one month.
- Rights in relation to automated decision making and profiling
 - We do not as a rule engage in any automated decision making procedures. You therefore cannot request a human intervention in such decision making.
 - Profiling is dealt with above.

Subject Access Requests

If you wish to request information about the data we hold on you, please email enquiries@normanstreet.co.uk and we shall endeavour to process your request within 40 days.

We reserve the right to charge a fee for the request and to request further information to prove your identity and to locate the records you are looking for.

Lawful Basis for Processing

Evans House will rely on one or more basis' for processing data:

- Consent - Where possible, we will request your express consent, usually verbally, or by email, to store personal data about you and process it.
- Contract - In respect of any party that we are currently, have previously or are likely to engage in contractual relationships with, we are entitled to store personal data and process it.
- Legitimate interest - We may store and process personal data where it is necessary to pursue a legitimate interest (whether yours or ours), so long as the legitimate interest is balanced against your personal rights, interests and freedoms.

Personal Data Breaches

The Management Board are under a duty to detect, investigate and report potential data breaches.

A personal data breach will occur during security incidents including where:

- personal data is lost, destroyed, corrupted or disclosed;
- if someone accesses the data or passes it on without proper authorisation; and
- if the data is made unavailable and this unavailability has a significant negative effect on you.

We detect personal data breaches by storing data in specific locations. If data is affected (whether adversely or not) we will automatically be notified by our security contractors (who protect hard copy data), firewall/antivirus software and/or third party data storage providers (e.g. Google) that protect cloud based storage of data. Access to data we hold is limited to a small amount of people. Any potential incidents that have not been reported by the above means will likely be detected by day to day administration tasks (e.g. if financial records have disappeared we would find this on a routine account reconciliation very quickly).

Where a security incident occurs, we shall take reasonable steps to identify whether there has been a breach of data protection without delay. Our investigation will include establishing:

- what data has been affected;
- how it has been affected;
- if the breach is significant (likely to risk to people's rights and freedoms);
- what steps need to be taken to secure the data and/or remedy the incident;
- who has caused the incident;
- if our risk assessment need to be amended to include new control measures; and
- who needs to be notified.

Whether there has been a risk to your rights and freedoms will need to be assessed on a case by case basis, but broadly speaking, it may include adverse effects on you, which includes:

- emotional distress;

- physical damage; and
- material damage.

If we identify a personal data breach that is likely to risk to your rights and freedoms, we shall endeavour to:

- inform the Information Commissioner's Office within 72 hours, providing at the same time:
 - a description of the nature of the personal data breach;
 - the name of our contact for Data Protection matters; and
 - a description of the likely consequences of the breach and a description of the measures taken;
- inform you (by copying you into the report);
- provide you with advice as to how to protect yourself from the breach;
- take reasonable steps to address the breach; and
- record the breach internally.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated on 18 March 2018.