

Privacy Notice

INTRODUCTION

AD HOC PROPERTY MANAGEMENT LIMITED manage void and vacant buildings by providing temporary housing to working professionals, we call Guardians (or Licensees). At Ad Hoc, we respect your privacy and are committed to protecting your personal data in accordance with the General Data Protection Regulation (GDPR). This privacy notice will inform you on how we look after your personal data when you register with us, your privacy rights and how the law protects you.

We are a Guardian company, whose normal activities can be summarised as:

1. Securing void and vacant properties (both residential and commercial buildings);
2. Facilitating property maintenance and repairs; and
3. Managing your housing account and your temporary home needs.

Please use the **Glossary** at the end, to understand the meaning of some of the terms used in this Privacy Notice.

This Privacy Notice was last updated on 24/05/2018.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Ad Hoc collects and processes your personal data when you first register to become a Guardian, during the application process and whilst you reside in any Ad Hoc managed property. It is important that you read this privacy notice, so that you are fully aware of how and why we use your data.

This notice is not intended for children and we do not knowingly collect data relating to children.

WHO WE ARE

Ad Hoc Property Management Limited, whose registered office is Unit 20 & 21 Angel Gate, City Road, London EC1V 2PT, is the data controller and so responsible for your personal data. We are a wholly owned subsidiary of Ad Hoc International BV (our Dutch parent company) and are affiliated with Ad Hoc Property Owners Limited, Ad Hoc Licensee Limited and Ad Hoc UK Security Limited within the Ad Hoc Group (collectively referred to as Ad Hoc, “we”, “us” or “our” in this privacy notice).

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data protection officer whose details are on the final page of this privacy notice.

2. WHAT DATA DO WE COLLECT ABOUT YOU?

Personal data, or personal information, means any information about an individual from which you can be identified from. It does not include data where the identity has been removed (anonymous data). Ad Hoc obtains information from you, the moment you register for one of properties either on our website

www.adhocproperty.co.uk or any of our property portals, such as Right move and Zoopla. This data is collected from our registration forms, when you contact our local branches, speak with our national sales office, email us, attend our offices or properties and when we meet you face-to-face or respond to our surveys. Our landline phone calls are recorded for training and monitoring purposes and recordings are usually held for a period of three months.

The **Data** we need from you as a Guardian, are grouped together as follows:

- **Identity Data** includes first name, maiden name, last name or similar identifier, marital status, title, date of birth, national insurance number, employer details, occupation, gender, social media accounts i.e. Facebook, Instagram or twitter accounts and proof of your identity / photo ID.
- **Contact Data** includes billing address, previous home address, employment address / contact number, email address (work and personal), telephone numbers and contact details for at least two emergency contacts.
- **Financial Data** includes bank account and payment card details for direct debit payment, bank statements and wage slips / payslips.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our External Third Parties and your communication preferences.

We collect some **Special Categories of Personal Data** about you, such as your:

- **Race and Ethnic Origin** – as a property management company we have a legal obligation to comply with Right to Rent regulations and carry out immigration status checks on each applicant, in accordance with the Immigration Act 2014. Subsequent checks whilst you reside in our properties will be carried out to obtain updated immigration status documents, when necessary.
- **Medical conditions and/or disabilities** - this information is used to ensure we place you in the most suitable property, conduct essential adaptations and to implement required safeguards for you and our staff.
- **Criminal convictions and offences** – the majority of our properties are shared facilities and/or are buildings connected to or associated with vulnerable people, so at times, we are requested to obtain this from you. We will only obtain this information with your prior explicit consent.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of your licence agreement we have with you and you fail to provide that data when requested, we may not be able to hold an agreement with you. In this case, we may have to cancel your application but we will notify you if this is the case at the time.

3. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to manage your account, licence fees, arrange maintenance and collect fees.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

- To assist our weekly or monthly unannounced property inspections, the information gathered will aid inspectors report on your conduct, the state of the property, maintenance requirements and compliant handling.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting our Data Protection Officer at contact@adhoc.eu.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal grounds we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To create an electronic and paper account for you to register you as a new guardian - we store your data onto Salesforce, our G-Drive and in paper format.	(a) Identity data (b) Contact data (c) Financial data (d) Race and Ethnic Origin (e) Medical conditions and/or disabilities (f) Criminal convictions and offences	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (to comply with duties within the Immigration Act 2014) (c) Necessary for our legitimate interests (to safeguard you're your fellow guardians and our staff, whilst you reside in our properties)
(a) To manage your account, licence fees and charges – also to collect and recover money owed to us; (b) To facilitate repairs, maintenance and modifications of our properties, when necessary.	(a) Identity data (b) Contact data (c) Financial data (d) Medical conditions and/or disabilities	(a) Performance of a contract with you (b) Necessary for our legitimate interests (gathering medical data can assist us with advising you on the most suitable property we have)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy or property management (b) Passing your details onto	(a) Identity data (b) Contact data (c) Marketing and Communications data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and to study how Guardians use our properties and further services, we may

External Third Party to achieve effective property management and safety standards (c) Asking you to leave a review or take a survey		provide) We may pass your Contact Details to External Third Parties who need access to a building to conduct maintenance works, we will always seek your consent prior to doing so.
(a) To enable you to partake in a prize draw, competition or complete a survey (b) To make suggestions and recommendations to you about our available properties and various property services that may be of interest to you, such as cleaning services, insurance or broadband	(a) Identity data (b) Contact data (c) Marketing and Communications data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how guardians use our properties, improve our scheme and services and develop our business)
To modify each property for the needs of Guardians – to ensure properties are safe, well maintained and that guardianship rules and contractual obligations are being adhered to	(a) Identity data (b) Contact data (c) Medical conditions or disabilities data	(a) Necessary for our legitimate interests (for running our business and to keep each property safe and secured, contractual obligations and general property rules must be adhered to) (b) Necessary to comply with a legal obligation

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising, using the following personal data control mechanisms:

- (i) You will receive marketing communications from us if you have requested information from us, enquired into any of our properties or occupied our property, in each case, you have not opted out of receiving that marketing; and
- (ii) We will get your express opt-in consent before we share your personal data with any company outside the Ad Hoc group of companies for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting our Data Protection Officer on

contact@adhoc.eu. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your registration with us or service experiences.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with External Third Parties as set out in the Glossary for the purposes set out in the table above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

In limited and necessary circumstances, your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements. Where necessary, we would only transfer data outside of the EEA to an organisation of entity that provides the following safeguards:

- a legally binding and enforceable instrument between public authorities or bodies;
- Binding Corporate Rules;
- standard contractual clauses adopted by the European Commission;
- standard contractual clauses adopted by the supervisory authority and approved by the European Commission;
- approved codes of conduct; and
- approved certification mechanisms.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are

subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see Request erasure below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are discussed below:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract means processing your data where it is necessary for the performance of the licence agreement we have with you or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

External Third Parties

- (a) **Service providers / Suppliers** acting as processors based in the United Kingdom (this includes: Rent4Sure who conduct your credit, employment, landlord, ID and guarantor checks. DBS checks. Maintenance businesses for electrical safety, gas safety, cleaners/clearance/removal companies and general maintenance suppliers, to safeguard your property.
- (b) **Professional advisers** acting as joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- (c) **HM Revenue & Customs, regulators and other authorities** acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances, such as, utility companies who we notify when you move into a property and debt collection companies, who we instruct to pursue arrears or legal fees owed by you.
- (d) **UK Border Agency and/or Home Office**, who we contact to verify immigration documents.
- (e) **Property Owners** who regularly attend your property and/or request Contact Information on guardians within their buildings (which include Housing Associations, Charities, Local Authorities and Private Individuals)
- (f) **External Marketing Company** who from time to time send out marketing and communication on our behalf.

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”).

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

CONTACT DETAILS

AD HOC PROPERTY MANAGEMENT LIMITED is the controller and processor of data for the purposes of the DPA 18 and GDPR. If you have any questions about our privacy notice or information we hold about you, please contact our:

Data Protection Officer: **JEREMIAH HOMWE**
Ad Hoc Property Management Ltd.
Unit 20 & 21 Angel Gate City Road London EC1V 2PT
E-mail: contact@adhoc.eu

Or you can write to our in-house solicitor **Isioma Ohakawa** using the postal address above.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.