

Property Owners Privacy Notice

INTRODUCTION

1. PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Ad Hoc collects and processes your data during the management of your 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.

2. 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.

We may transfer information about you to other group companies for purposes connected with your agreement or the management of the company’s business.

3. WHAT DATA DO WE COLLECT ABOUT YOU?

Much of the information we hold will have been provided by you, if you have enquired into any of our property services on our website www.adhocproperty.co.uk, you have contacted (or been contacted) by one of our Business Development Managers, you have been referred to us by an existing client, a contractor or guardian or you have attended one of our nine branches.

The sort of information we hold (if you are affiliated with an corporate organization) includes your organizations contact name, work email and postal address, work number, bank details, land registry report, correspondence with or about you, for example letters to you about the condition of your buildings, maintenance agreements and updates, information collected for monitoring purposes such as client demographics, email addresses for surveys and marketing purposes for example.

If you are a private property owner, we will gather similar information as shown above to verify that you have the necessary legal status to let the property and contractually authorise us to manage the property.

You will, of course, inevitably be referred to in company documents and records that are produced by our staff in the course of carrying out their duties and the business of the company. You should refer to the Privacy Policy which is available on our website.

Other than as mentioned in this privacy notice, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to our insurers, contractors, legal advisers, local authorities, utility companies or the police.

4. HOW YOUR INFORMATION WILL BE USED

As your one stop shop and trustee provider for all vacant property solutions, Ad Hoc needs to keep and process information about you for maintaining a business relationship with you. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during our early discussion and proposal stage, whilst we are managing your property and even during the period when we do not actively manage your property.

This includes using information to enable us to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

As a company pursuing the protection of vacant properties on your behalf primarily through the Guardian model alongside other security services and products, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. The nature of our legitimate interests include drawing up and issuing contractual terms and conditions, submitting your data to third parties for, tax purposes, keeping accurate records of all property owners for statutory audit purposes, for health and safety reasons, sharing data with our insurers, professional advisers, submitting data to our Dutch parent Company and other companies within our group for reporting purposes, sharing data with current and potential Guardians and other Clients for the purposes of arranging business meetings, sharing data with law enforcement agencies such as the HMRC when required for example.

The legitimate interests given here are not exhaustive and only includes some of the most common uses. The Company will notify you in writing should any new legitimate interest not already covered by the given example arises. We will never process your data where these interests are overridden by your own interests.

5. 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.

6. 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.

Your personal data will be stored for a period required by law for current and former Clients for tax purposes or the criteria used for determining how long your data will be based on current legislation.

If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

7. 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 (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.

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

8. **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 monthly updates from us via our newsletters or property inspection reports, 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.

9. **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.

10. **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

11. **DATA RETENTION**

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 above 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.

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.