

## **Clouds Property Management**

### **Fair Processing Notice**

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

#### **Who are we?**

**Clouds Property Management, 18 Forth Street, Edinburgh, EH1 3LH** (“we” or “us”) take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act 2018 and UK General data Protection Regulations, together with any other laws subsequently enacted.

We are registered as a data controller with the Information Commissioner's Office (ICO) under registration number Z1356664 and we are the data controller of any personal data that you provide to us.

Our point of contact is Mark McLeod, Clouds Property Management, 18 Forth Street, Edinburgh, EH1 3LH.

Any questions relating to this notice and our privacy practices should be sent to [mark@clouds.co.uk](mailto:mark@clouds.co.uk).

## **How we collect personal information from you and what information we collect**

We collect personal information about you:

- when you apply to rent a property with us, become a tenant, become a landlord for whom we act as managing agent, become a guarantor, request services/repairs, enter into a tenancy agreement with or through ourselves howsoever arising or otherwise provide us with your personal details;
- from your use of our online services, whether to report any tenancy related issues, make a complaint or otherwise, including use of our website in terms of which cookies are collected;
- from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information).

We collect the following personal information about you:

- Name;
- Date of birth;
- Address;
- Telephone number;
- Email address;
- National Insurance Number
- Next of kin/ emergency contact details
- Marital status/ dependants/ household composition
- Photo ID
- Communication preferences
- References
- Work details and/or university/higher education details
- Council Tax reference (as part of identification checks)
- Utility Bill (as part of identification checks)
- Bank details (as part of identification checks)
- Disability

We receive the following information from third parties and have a legitimate business interest in processing that information:

- benefits information, including awards of Housing Benefit/Universal Credit;
- payments made by you to us via your bank;
- complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland;
- reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour.

### **Why we need this information about you and how it will be used**

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request, housing application and complaints made;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our services or suppliers which may affect you;
- for all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our products and services.

## **Sharing of your information**

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK. We may disclose your information to other third parties who act for us where it is in our or the third party's legitimate interests so long as those interests are not contrary to your rights and freedoms under data protection laws. This includes the following:

- if we enter into a joint venture with or merge with another business entity, your information may be disclosed to our new business partners or owners;
- if we instruct repair or maintenance works, your information may be disclosed to any contractor;
- if we are investigating a complaint, information may be disclosed to Police Scotland, local authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- if we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and local authority);
- As a tenant, your information may be shared with your landlord who we act on behalf of;
- if we are investigating payments made or otherwise, your information may be disclosed to payment processors, local authority and the Department for Work & Pensions;
- if we are conducting a survey of our products and/or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- if we take payment from you or make payments to you we may be required to disclose your information to our client bank account provider;
- if we are asked by HMRC in regard to taxation, your information may be accordingly disclosed;

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

## **Transfers outside the UK**

We may transfer your information outside the UK where software providers are based outwith the UK. Where information is transferred outside the UK we ensure that there are adequate safeguards in place to protect your information in accordance with this notice, including ensuring there are sufficient contractual agreements in place regarding compliance with data protection laws OR that the third country has adequate safeguards or security provisions in place.

## **Security**

When you give us information we take steps to make sure that your personal information is kept secure and safe. We are committed to keeping personal information secure. We have implemented technical, administrative and physical procedures designed to protect personal information from loss, misuse or alteration. All hard copy of your data is stored securely in locked filing cabinets which can be accessed only by our employees. Electronic data is stored securely with appropriate technical and security measures in place, as well as restrictions on access.

## **How long we will keep your information**

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

### *Retention*

We will retain your personal data for no longer than is necessary. We retain personal data collected as outlined above for a period of 7 years after our relationship with you has ended (whether you are a tenant or landlord)

## Your rights

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data we hold about you;
- ask us to restrict or object to processing;
- data portability (in certain circumstances);
- be informed of and challenge any decisions based solely on automated processing;
- and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at [mark@clouds.co.uk](mailto:mark@clouds.co.uk).

Should you wish to complain about the use of your information, you should contact us to resolve this matter in the first instance. You also have the right to complain to the ICO in relation to our use of your information. The ICO's contact details are noted below:

The Information Commissioner's Office – Scotland  
Queen Elizabeth House, Sibbald Walk, Edinburgh, EH8 8FT  
Telephone: 0303 123 1115  
email: [scotland@ico.org.uk](mailto:scotland@ico.org.uk)

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.