

Data Protection Policy

Introduction

This Policy sets out the obligations of Flatline Bristol Ltd, a company registered in United Kingdom under number 11614550 whose registered office is at 182 Whiteladies Road, Clifton, Bristol, BS8 2XU regarding data protection and the rights of Landlords, Tenants, Consumers, Maintenance Contractors, (“data subjects”) in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

We are committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals

Flatline Bristol Ltd, is the Data Controller, Dominic Harvey is the person responsible for data protection and can be contacted at 182 Whiteladies Road, Bristol, BS8 2XU.

This privacy notice will be regularly reviewed and updated.

Information held

The personal data we process may include the information in column A of the attached appendix and may also include other sensitive data concerning health, if relevant to your application. Where the provision of data is a statutory, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data may mean that we are unable to provide you with our service.

To ensure that we provide you with the best service possible we will need to collect and retain certain personal data. The data may be collected and processed by those listed in columns B and F. How we source the data is identified in column C.

Lawful basis of processing

Your personal data will be used for the activities in column D. There are six lawful bases for processing your data including consent, a legitimate interest, contract fulfilment, a legal obligation and a vital interest. For each usage of the data the lawful basis of the processing of your data will be identified in column E. A legitimate interest is when we have a business or commercial reason to process your personal data which needs to be balanced with your interests i.e. what is right and best for you.

Where we state that we have a legitimate interest, the fact that we have a legitimate interest and what that legitimate interest is, will be stated in column E, e.g. keeping in touch with you whilst you are looking for a property; to seek your consent when we need it to contact you.

Online identifiers, IP addresses and cookie identifiers

When you visit our website we may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users’ browsing actions and patterns.

We may obtain information by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site. You can find more information about cookies at www.allaboutcookies.org

This policy only applies to our site. If you leave our site via a link or otherwise, you will be subject to the privacy policy of that website provider. We have no control over that privacy policy or the terms of the website and you should check their privacy policy before continuing to access the site.

Recipients of personal data

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

Where is the data stored?

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

Retention period and criteria used to determine the retention period

We will retain some elements of your personal data for up to the time defined in column H after your enquiry. The information which can be anonymized will be that which is no longer required for either contractual fulfilment or a legitimate interest. If the lawful basis for processing your data was consent then you may withdraw such consent at any time.

Where you have actually carried out a property viewing we will hold your data for a longer period of time compared to if you have only enquired of our service and we have been unable to help you.

Your rights

You have a right of access to check your personal data to verify the lawful basis of processing. We are obliged to respond to an access request within 30 days and may not charge a fee unless the request is unfounded, excessive or repetitive. If a fee is charged it is to be a reasonable fee based upon the administrative cost of providing the information.

You have a right to rectification if the data we hold is either inaccurate or incomplete. If your data has been disclosed to third parties then we must inform them of the rectification, where possible.

You have a right to require erasure of your data when consent is our basis of processing (the right to be forgotten). You may request that your personal data be erased, for example, where there is no compelling reason for its continued processing or where you withdraw consent. We will comply with your request unless we have another basis of processing justifying our retaining the data (for example a legal requirement or the defence of a legal claim).

You have some rights to ask us to restrict processing i.e. to block or suppress processing where, for example, the data may be incorrect and whilst the accuracy is verified. We are permitted to store the data.

Your right to object

You do have a right to object to further processing of your personal data. We may be required to stop processing unless there is some other legitimate basis of processing such as a legitimate interest or a requirement for the exercise or defence of a legal claim.

Withdrawal of consent

Where the lawful basis for processing is your consent, you may withdraw consent at any time by writing to our lettings Team, Flatline Bristol Ltd at 182 Whiteladies Road, Clifton, Bristol, BS8 2XU or emailing lettings@flatlineonline.co.uk.

How to lodge a complaint with the supervisory authority

The supervisory authority responsible for data protection is the Information Commissioners Office (ICO) to whom concerns may be reported by phone on **0303 123 1113** or +44 1625 545 745 if calling from outside the UK, by email using the form on the website ico.org.uk or the livechat function.

Data controller: Dominic Harvey							
Information held	Who is collecting it?	How is it collected?	Why is it collected (what are we going to do with it?)	Lawful basis for processing	Who will it be shared with?	How is it stored?	When will it be deleted?
Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H
Applicant Name	Staff	In office, over the phone, email, self-registration, tenancy application form	To add to database	Consent	Staff, landlords, software provider	paper / Software system	4 months
			To be able to contact applicant	Consent	Staff, landlords		
			To give to or discuss with landlord	Consent	Landlord		
			To create a tenant record	Consent	Staff, landlords, software provider		
			To create application process	Consent	Staff, landlords, software provider		
Applicant Guarantor details	Staff	In office, over the phone, email, self-registration, tenancy application form	To create application process	Consent	Staff, landlords, software provider	paper / Software system	4 months
Applicant contact details	Staff	In office, over the phone, email, self-registration, tenancy application form	To add to database	Consent	Staff, landlords, software provider	paper / Software system	4 months
			To be able to contact applicant	Consent	Staff, landlords		
			To give to or discuss with landlord	Consent	Landlord		
			To send marketing details to	Consent	Staff		
			To create a tenant record	Consent	Staff, landlords, software provider		
Applicant Employment details	staff	In office, over the phone, email, self-registration, tenancy application form	To create application process	Consent	Staff, landlords, software provider	paper / Software system	4 months
			To create application process	Consent	Staff, landlords, software provider		
Applicant Guarantor details	staff	In office, over the phone, email, self-registration, tenancy application form	To create application process	Consent	Staff, landlords, software provider	paper / Software system	4 months
Tenant name	Staff/Referencing company/Tenancy software	In office, over the phone, email, self-registration, tenancy application form	To use on contract	Contract fulfilment	Landlord, staff, software provider	paper / Software system	During tenancy & 6 years beyond

Tenant contact details	Staff/Referencing company/Tenancy software	In office, over the phone, email, self-registration, tenancy application form	Add to property management software	Contract fulfilment	Staff, Contractors, Software provider	paper / Software system	During tenancy & 6 years beyond
			Referencing	Contract fulfilment	Staff, Credit check Co., referencing co., software providers		
			To be able to contact tenant e.g. property management	Contract fulfilment	Staff, Landlord, Contractors		
			To use on prescribed information	Legal obligation	Staff, Deposit scheme, relevant person		
			To offer extra services - insurance	Consent	Landlord, staff, 3rd party, software provider		
			If legal action is needed	Legal work	Landlord, staff, software provider		
			Services	Contract fulfilment	Council Tax & utility providers, landlord, software providers		
			Complaints - Anti social behavior	Contract fulfilment	Local authorities, police, university liason officer		
			To use on contract	Contract fulfilment	Landlord, staff, software provider		
			Add to management software	Contract fulfilment	Staff, Contractors, Software provider		
			Referencing	Contract fulfilment	Staff, Credit check Co., referencing co., software providers		
			To be able to contact tenant e.g. property management	Contract fulfilment	Staff, Landlord, Contractors, Software provider		
			To use in prescribed information	Legal obligation	Staff, Deposit scheme, relevant person		
			To offer extra services - insurance	Consent	Landlord, staff, 3rd party, software provider		
If Legal action is needed, for example possession claim	Legal Work	Solicitors, Court Services					
Services	Contract fulfilment	Council Tax & utility providers, landlord, software providers					
Complaints - Anti social behavior	Contract fulfilment	Local authorities, police, university liason officer					
Tenant Employer information	Staff/Referencing company/Tenancy software	In office, over the phone, email, self-registration, tenancy application form	Referencing & assessment	Contract fulfilment	Staff, landlord, referencing co.	paper / Software system	During tenancy & 3 years beyond
Tenant's current landlord information	Staff/Referencing company	In office, over the phone, email, self-registration, tenancy application form	Referencing & assessment	Contract fulfilment	Staff, landlord, referencing co.	paper / Software system	During tenancy & 3 years beyond
Credit score results, history	Referencing company	Email or online	To assess suitability	Contract fulfilment	Staff, landlord	paper / Software system	During tenancy & 3 years beyond
Other returned references	Referencing company	Email, online	To assess suitability	Contract fulfilment	Staff, landlord	paper / Software system	During tenancy & 3 years beyond

Tenant passport or ID documents	Staff/Referencing company/Tenancy software	Photocopy of original, face to face	To comply with right to rent checks	Legal obligation, contract fulfilment	Staff, landlord, Home Office	paper / Software system	During tenancy & 3 years beyond
Tenant bank details	Staff	face to face, over the phone, email	repayment of deposit (where applicable)	Contract fulfilment	Staff, landlord	paper / Software system	During tenancy & 3 years beyond
Guarantor name	Staff/Referencing company/Tenancy software	In office, email, self-registration	To use on Guarantor Agreement	Contract fulfilment	staff, landlords, referencing company, software providers	paper / Software system	During tenancy & 3 years beyond
			Referencing	Contract fulfilment	staff, landlords, referencing company, software providers		
			To be able to contact Guarantor	Contract fulfilment	staff		
			If legal action is needed	Legal work	Solicitor, Court Services		
Guarantor contact details	Staff/Referencing company/Tenancy software	In office, email, self-registration	To use on Guarantor Agreement	Contract fulfilment	staff, landlords, referencing company, software providers	paper / Software system	During tenancy & 3 years beyond
			Referencing	Contract fulfilment	staff, landlords, referencing company, software providers		
			To be able to contact Guarantor	Contract fulfilment	staff		
			If legal action is needed	Legal Work	Solicitors, Court Services		
Guarantor Employer information	Staff/Referencing company/Tenancy software	self-registration	Referencing & assessment	Contract fulfilment	staff, landlords, referencing company, software providers	paper / Software system	During tenancy & 3 years beyond
Guarantor credit score results, history	referencing company	Email or online	To assess suitability	Contract fulfilment	staff, landlords, referencing company	paper / Software system	During tenancy & 3 years beyond
Guarantor other returned references	referencing company	Email or online	To assess suitability	Contract fulfilment	staff, landlords, referencing company	paper / Software system	During tenancy & 3 years beyond
Guarantors passport or ID documents	Staff/Referencing company/Tenancy software	Photocopy of original, email, self-registration	To confirm identity	contract fulfilment	staff, landlords, referencing company, software providers	paper / Software system	During tenancy & 3 years beyond
Guarantors NI number	Referencing company/Tenancy software	self-registration	Referencing & assessment	contract fulfilment	staff, landlords, referencing company, software providers	paper / Software system	During tenancy & 3 years beyond
Landlord name	Staff	In office, over the phone, email, letting/management contract	To use on contract	Contract fulfilment	Tenants, staff, software providers	paper / Software system	During tenancy & 6 years beyond
			to use on Tenancy application form	Contract fulfilment	Tenants		
			Add to property management software	Contract fulfilment	Staff, Contractors, Software provider		
			To be able to contact Landlord e.g. property management	Contract fulfilment	Contractors, staff, tenants		

			To use on prescribed information If legal action is needed to comply with HMRC requirements Services	Legal obligation Legal work legal obligation Contract fulfilment	Staff, Deposit scheme, relevant person Solicitor, Court Services HMRC Council Tax & utility providers		
Landlord contact details	Staff	In office, over the phone, email, letting/management contract	To use on contract	Contract fulfilment	Tenants, staff, software providers	paper / Software system	During tenancy & 6 years beyond
			Add to property management software To be able to contact Landlord e.g. property management	Contract fulfilment Contract fulfilment	Staff, Contractors, Software provider Contractors, staff, tenants		
			To use on prescribed information If legal action is needed to comply with HMRC requirements Services	Legal obligation Legal work legal obligation Contract fulfilment	Staff, Deposit scheme, relevant person Solicitor, Court Services HMRC Council Tax & utility providers		
Landlord Deposit ID	Staff	In office, over the phone, email, letting/management contract	transfer deposits (where applicable)	Contract fulfilment	Staff, Deposit scheme	paper / Software system	During tenancy & 6 year beyond
Landlord bank details	Staff	In office, over the phone, email, letting/management contract	Making payments	Contract fulfilment	Staff, Tenants	paper / Software system	During tenancy & 6 year beyond
Contractor name	Staff	In office, over the phone, email, self-registration	Add to property management/maintenance software To be able to contact Contractor	Contract fulfilment Contract fulfilment	Staff, Software provider staff, Landlord, Tenant, Other Contractor	paper / Software system	6 years beyond service
Contractor contact details	Staff	In office, over the phone, email, self-registration	Add to property management/maintenance software To be able to contact Contractor	Contract fulfilment Contract fulfilment	Staff, Contractors, Software provider staff, Landlord, Tenant, Other Contractor	paper / Software system	6 years beyond service
Contractor bank details	Staff	In office, over the phone, email, invoice	make payments	Contract fulfilment	Staff, Landlord, Tenant	paper / Software system	6 years beyond service