

PARK PM PRIVACY POLICY

1. Introduction

1.1 We are Park Property Management Limited (company registration number SC413993). We operate as Park Pm and we have our registered office at 11 Somerset Place, Glasgow, G3 7JT. (“we”, “us” or “our”). We are committed to protecting and respecting your privacy.

1.2 This Privacy Policy (and any other documents referred to in it) sets out the basis on which we will process and use any personal data about our clients, potential clients and visitors (together “clients”) to our website www.parkpm.co.uk (“website”) that we collect from them, that they provide to us, or that we collect from third parties. Please read this Privacy Policy carefully to understand our practices regarding these individuals’ personal data and how we will treat it.

1.3 For the purpose of the Data Protection Act 1998, (the “DPA”) and the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, (the “GDPR”), we are the data controllers and are located at Claremont Centre, Units 10-13, 39 Durham St, Glasgow G41 1BS.

1.4 We comply with the DPA and will comply with the GDPR once this becomes applicable from 25 May 2018 in respect of the collection, holding, storage, use, and processing of personal data about our supporters (such personal data is held in both manual and electronic records).

1.5 We may make changes to this Privacy Policy from time to time. If we do so, we will post the changes on this page and they will apply from the time we post them. Individuals should check back frequently to see any updates or changes to this Policy. This Privacy Policy was last updated on 1 March 2018.

2. Personal data that we collect

2.1 Personal data

(a) We collect and use the following types of personal data about our customers:

(i) personal information such as

- name;
- postal address;
- phone numbers (home, work and mobiles as applicable);
- email address(es);
- contact preferences;
- information given when registering to use or completing forms on our website;
- information on payments made;
- information that our customers give us – for example when making payments, such as bank account details for setting up regular direct debits, credit card details for processing credit card payments;
- information given when using our website; and
- information given when taking part in Park PM’s social media functions or on our website.

(ii) the marketing preferences of our clients and whether and when consent to receive marketing communications has been given or withdrawn. We currently do not engage in any marketing and have a default preference of not given for all clients.

(iii) correspondence between customers and ourselves (whether by telephone, e-mail or otherwise).

(b) We also collect and use certain technical information about our supporters’ visits to our website which may include, for example, internet protocol (“IP”) addresses, login information, browser type and version, pages accessed, files downloaded, full Uniform Resource Locators, (“URLs”), clickstream to, through and from the website (including date and time), products viewed or searched for, page response times, download errors, length of visits to certain pages and page interaction information (such as scrolling, clicks and mouse-overs).

(c) We collect some of the personal information set out above directly from customers and some from third parties (for example, we may receive personal information from the land registry).

(d) Supporters don’t have to disclose personal data to us to browse the website or to use our social media sites, but supporters do need to provide us with certain personal data in order for us to provide them with certain services.

(e) The safety of children is very important to us. We do not knowingly collect the personal data of those who are under 16 years old without the consent of their parent or guardian. If you are under 16 please call us on 0141 354 6536 for further information.

3. Cookies

3.1 Our website does not use cookies.

4. How we use personal data

4.1 We obtain, collect, record, hold, store, organise, adapt, alter, retrieve, consult, disclose, destroy and otherwise use personal data of supporters, as set out in this Privacy Policy, for the following purposes:

- (a) providing customers with the products, services and information that they ask us for;
- (b) corresponding with customers and recording any relevant communications;
- (c) sending marketing information to our customers;
- (d) keeping records of payments made and actions taken by our customers;
- (e) performing our obligations under any contracts that we enter into with customers;
- (f) telling customers about changes to our services;
- (g) ensuring that content from our website is presented effectively for customers and for their computers;
- (h) administering our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (i) improving our website to ensure that content is presented most effectively for customers and their computers;
- (j) allowing customers to choose to take part in interactive features of our services; and
- (n) keeping our website safe and secure.

5. How we share personal data

5.1 We will share clients’ personal data with CPL Software Limited, (company registration number SC370241) which has its registered office at 87 St. Vincent Street, Glasgow, G2 5TF (“CPL”) in their role as the provider of the Park PM customer database platform. CPL will only access personal records of supporters if requested to do so by us, to assist us in the delivery of our services. We will share clients’ personal data with solicitors and debt collection agencies on an ad hoc basis to pursue outstanding balances on accounts.

Beyond this, we will only share clients’ personal data if:

(a) we or CPL are working with partners whom we or CPL have carefully selected to carry out work on our behalf, such as service providers and sub-contractors (for example, IT services providers and providers of technical, payment and delivery services) to perform any contract we or CPL enter into with them. The kind of work we or CPL may ask them to do includes processing, packaging, mailing and delivering purchases, answering questions about us and any services we provide, carrying out research or analysis to assist us in our mission and processing credit card payments.

We and CPL only choose partners we trust and only pass personal data to them where they have undertaken to keep your personal data secure. We do not allow, and we ensure that CPL does not allow, these partners to use your data for their own purposes or disclose it to other third parties and we will take all reasonable care to ensure that CPL and such partners keep your data secure; or

(b) we are legally required to do so e.g. by law or by an order of a court of competent jurisdiction.

We will not sell customers’ information. We will not share customers’ information with other organisations other than as stated above.

6. Legal basis for processing personal data

We rely on various legal bases to justify our processing of supporters' personal data. Further /details of these are set out below.

- (a) The customers consent to the processing of their personal data for the specific purposes mentioned above is mandatory as covered by your title deeds. The supporters may withdraw their consent to this processing at any time by contacting us using the contact details set out in the "Contact and complaints" section of this Privacy Policy below, but this will not affect the lawfulness of any processing of their personal data which was carried out before they withdrew their consent. This consent cannot be withdrawn in respect of legal collection of debt.
- (b) The processing is necessary for our legitimate interests. These legitimate interests include processing, packaging, mailing and delivering purchases, answering questions about us and any services we provide, carrying out research or analysis to assist us in our mission and processing credit card payments.
- (c) The processing is necessary to perform a contract to which the relevant customers are parties.
- (d) The processing is necessary for us, as the data controller, to comply with our legal obligations, such as sharing personal data where we are legally required to do so e.g. by law or by an order of a court.

7. Where we transfer and store personal data

7.1 The personal data that we collect from customers may be transferred to and/or stored at destinations outside the UK, but within the European Economic Area, (the "EEA"). As such, adequate protection for such personal and sensitive personal data will be ensured. However, it may also be processed by staff operating outside the EEA who work for one of our or CPL's suppliers (e.g. IT service providers) – in these instances, we carefully select suppliers or will ensure that CPL selects suppliers with whom we or CPL have appropriate contractual arrangements in place to ensure safeguarding of our supporters' personal data. This includes staff involved in, among other things, providing support services and processing payment details. We will take all steps reasonably necessary to ensure that supporters' personal data is treated securely and in accordance with this Privacy Policy and applicable law.

7.2 All information that customers provide to us is stored on our secure servers and/or on the servers of our suppliers who we have engaged to host various IT systems for us. Any payment transactions will be encrypted using TLS technology. Where we have given supporters (or where they have chosen) a password which enables them to access certain parts of our website, they are responsible for keeping this password confidential. We ask them not to share this password with anyone.

7.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect supporters' personal data, we cannot guarantee the security of data transmitted to our website; any transmission is at supporters' own risk. Once we have received personal information, we will use strict procedures and security features to try to prevent unauthorised access.

7.4 Our mission is to manage properties to the best of our ability and in compliance with the Property Factors Scotland Act 2011. We will keep customers' information only for as long as they engage with us in any of the above ways, and only as long as we need it:

- (a) to administer their relationship with us;
- (b) to comply with the law; or
- (c) to ensure we do not communicate with customers who have asked us not to.

To assist us in this process we will review on a regular basis the personal data of supporters that we collect and hold to ensure that such data is only kept for an appropriate length of time.

8. Individuals' rights

8.1 Supporters have certain rights in respect of the personal data that we hold about them. To exercise any of the rights set out below, please contact us using the contact details set out in the "Contact and complaints" section of this Privacy Policy below:

- (a) **Access.** We will confirm to clients whether or not we are processing and using personal data about them, at their request and, if so, provide them with access to and a copy of such personal data and the other details to which they are entitled.
- (b) **Rectification.** We will correct any inaccurate personal data and complete any incomplete personal data (including by providing a supplementary statement) that we hold about clients without undue delay at their request.
- (c) **Prevention of processing likely to cause damage or distress.** We will respect our clients' rights to require us to cease or not to begin processing their personal data for a specific purpose, or in a specific way, that is likely to cause unwarranted damage or distress, either to the relevant individual or a third party.
- (d) **Erasure.** We will erase personal data concerning a client at their request without undue delay in certain circumstances, (for example, among other things, if their personal data is no longer needed for the purposes for which it was collected or otherwise used).
- (e) **Restriction.** We will restrict the processing of clients' personal data in certain circumstances (for example, among other things, if they believe that their personal data held by us is inaccurate), if requested by them to do so.
- (f) **Data portability.** We will respect the rights of clients to receive personal data about them that they have provided to us in a structured, commonly used and machine-readable format and to transmit such personal data to another data controller without hindrance from us in certain circumstances.
- (g) **Right to object.** We will respect the general rights of clients to object to the processing of their personal data in certain circumstances.
- (h) **Right to object to marketing.** We will respect clients' rights regarding use of their personal data for direct marketing purposes. In particular, we will not begin or we will cease processing any personal data of individuals for direct marketing purposes if at any time individuals ask us not to do so.
- (i) **Automated individual decision-making, including profiling.** Where requested, we will not make decisions based on automated processing, including profiling and we will ensure that you can always obtain a review by one of our staff members of any automated decisions and are able to express your point of view and contest any such decisions. We will not make any automated decisions based on sensitive personal information unless we have obtained your explicit consent to do so, or this is otherwise necessary for substantial public interest reasons based on applicable law.

8.2 We will process all personal data in line with clients' rights in each case to the extent required by and in accordance with applicable law only (including, without limitation, in accordance with any applicable time limits and requirements regarding fees and charges).

8.3 We will respect clients' rights regarding use of their personal data for direct marketing purposes. In particular, we will not begin or we will cease processing any personal data of individuals for direct marketing purposes if at any time a client asks us to stop.

8.4 Clients can exercise their rights by contacting us using the contact details set out below in the "Contacts and complaints" section of this Privacy Policy.

9. Contact and complaints

9.1 Questions, comments, requests or complaints regarding this Privacy Policy and/or our use of clients' personal data should be addressed to support@parkpm.co.uk or Customer Services, Park PM, 11 Somerset Place, Glasgow, G3 7JT.

9.2 If clients have any complaints regarding this Privacy Policy, they may also contact the UK Information Commissioner by telephone on 0303 123 1113 or at www.ico.org.uk/

9.3 We are not a 'public authority' as defined under the Freedom of Information Act 2000 and we will not therefore respond to requests for information made under that Act.