

# GDPR Privacy Notice – For Your Information

## Who are we?

We are **Southside Property Management Services Limited** of:  
**29-31 Leith Hill, Orpington, BR5 2RS**

## What do we do?

We are appointed by landlords (as defined by the Landlord & Tenant Act 1985) to manage the common areas of leasehold blocks. A landlord may be the Freeholder of the block (as individual(s) or a company), a Residents' Management Company (for tripartite leases or lessee-owned Freehold companies), a Right to Manage Company, or a court-appointed Residents' Association.

In some cases, we are also appointed by those responsible for the maintenance & management of shared services of an estate of Freehold houses. These may be the Freeholder or a Residents' Management Company.

## What is our role under the General Data Protection Regulation (GDPR)?

We consider ourselves to be a Data Processor acting on behalf of the landlords who have appointed us, who are Data Controllers as a result of their legal obligations. We are subject to the Office of the Information Commissioner (the Supervisory Authority).



### **Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel.: **0303 123 1113**

Email: **casework@ico.org.uk**

Web: **ico.org.uk**

## Where did we get your data?

Your data was initially received from you or from your solicitor, following your purchase of a unit within a block or estate for which we are the appointed managing agents. Subsequently, any data received by us was through the Data Controller, directly from you or from another Data Processor for the purposes described below.

## What is the purpose of processing your data?

Your property is subject to a lease (or transfer) to which you (the Data Subject) have agreed to the provision of maintenance, management & administration services by the landlord. We have been appointed by your landlord to administer the covenants of that lease. This involves maintaining accounts (including serving payment requests), administration and common area matters.

### **What is the lawful basis for this processing?**

Processing is necessary for the performance of a contract (the lease or transfer) to which the Data Subject (you) are a party, as per Article 6 GDPR (1)b.

Where your landlord is also a company of which you are a member or shareholder, it is required by Companies Act 2006 to maintain adequate accounting records and a list of members past and present. As such, processing is necessary for compliance with a legal obligation to which the Data Controller is subject, as per Article 6 GDPR (1)c.

Failure to comply would be a breach of covenant under the terms of the lease which may result in legal action.

### **What type of data do we keep?**

We hold your name and the address of the property for which you are the registered leaseholder, as well as transaction details in respect of the Service Charge (and Ground Rent where applicable). We hold details for interested parties, such as a mortgagee, if applicable. We also hold the following contact details, if provided: correspondence address, email, phone, key holder(s) name, key holder(s) phone, key holder(s) email, tenant(s) name, tenant(s) phone, tenant(s) email.

### **Where is this data stored?**

This data is stored in a database called Blockman, which is operated on Amazon Web Services located in the EU. This data is also stored in documents held on a cloud-based storage system called Dropbox, which is located in data centres in the EU. This data is also stored in email records, maintained by Gmail, and located in data centres in the EU.

Data stored and transferred by these systems are encrypted. Access to these systems is only granted to administrators associated with our office.

Finally, your data is, from time to time, stored in hard copy documents at our offices. Most of these documents are transferred to digital data storage and destroyed securely on site. Where hard copies continue to be held, they are stored at our offices (which are within the EU).

### **Who is this data shared with?**

This data is shared only with similar Data Processors for the purpose described above. From time to time, these Data Processors may include:

- Database management systems
- Auditors and accountants
- Solicitors
- Insurers and insurance brokers
- Debt collection agencies

### **How long will the data be stored?**

Your data will be maintained by us for as long as our appointment exists or for as long as required by Statute or for as long as Lawfulness of Processing can be established without consent.

### **What if you sell the property?**

If you sell the property, only your name, address and transaction details are retained on our data management system. All other contact details are erased from our data management system.

### **What are your rights?**

- You have a right to be informed.
- You may request a copy of your data stored.
- You may request correction to any erroneous data.
- You may request deletion of data, if not in violation of statutory or contractual requirements.
- You may request a restriction on processing.
- You may lodge a complaint to the controller or object to processing.
- You may lodge a complaint to the Supervisory Authority.
- You may withdraw consent to processing any data that originally required consent.

### **What happens in the event of a Data Breach?**

In the case of a data breach, the Data Controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the Supervisory Authority and Data Subject (that's you), if the personal data breach is likely to result in a risk to the rights and freedoms of natural persons.

### **Changes to this Notice**

This Policy may be subject to change and we will notify you of any changes.

### **Where can you find more information?**

A copy of your data can be made available to you on request. Please do not hesitate to get in contact by email to **enquiries@southside-property.co.uk**

You can (and must) ensure that we hold up to date details for you by completing our online leaseholder update form at: **www.southside-property.co.uk/update**

Further accessible information regarding the GDPR is available as 'GDPR Act Easy Read' from: **gdpr-info.eu**