



PRIVACY NOTICE – RESIDENTIAL

1. IMPORTANT INFORMATION AND WHO WE ARE

Harlestone Property Ltd is the "Data Controller" and is responsible for your personal data (collectively referred to as "the Company", "we", "us" or "our" in this privacy notice). We collect, use, and are responsible for personal information about you. When we do this, we are regulated under applicable UK data protection laws, including the UK GDPR and the Data (Use and Access) Act 2025.

This Privacy Notice informs you how we look after your personal data when you apply for a tenancy, become a tenant, resident, or guarantor, make an business enquiry, or visit our website at <https://northamptonbusinesscentre.co.uk>.

- **Company Name:** Harlestone Property Ltd (Company No: 08978481)
- **Data Privacy Manager:** Mr. Andrew Wagstaff
- **Address:** Northampton Business Centre, Lower Harding Street, Northampton, NN1 2JL
- **Telephone:** 07882138752
- **Email:** info@northamptonbusinesscentre.co.uk

Third-Party Data Provision: If you give us personal data on behalf of someone else (such as a joint tenant, occupier, or guarantor), you confirm that you have provided them with the information contained in this privacy notice and that they have explicitly agreed to let us use their personal data.

2. THE DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified. We collect, use, store, and transfer different kinds of personal data about you, grouped as follows:

- **Identity Data:** Full names, marital status, title, dates of birth, gender, National Insurance numbers, and passport detail, guarantor details..
- **Contact Data:** Current and previous addresses, billing addresses, email addresses, telephone numbers, and emergency contact/next-of-kin details.
- **Financial Data:** Bank account details, rent payment history, deposit data, and bank statements (provided for income and affordability verification).
- **Transaction Data:** Details about rent and deposit payments to and from you, and records of residential property services you have used.
- **Technical Data:** Internet protocol (IP) addresses, login details, browser types, and time zone settings if you interact with us via online application forms or portals. We may also collect and process personal data contained in correspondence sent to us by email, text message (SMS), WhatsApp, social media platforms, or messaging services (for example, Messenger). This may include contact details, communication content, attachments, and metadata associated with those communications.
- **Background, Referencing and Employability:** Employment status, occupation, employer details, historical salary information, benefit information (including Universal Credit or other welfare support where relevant), student status and educational information, credit history, background screening reports, and references from previous landlords, educational institutions, or employers. This information may be collected to assess affordability, eligibility, suitability, or compliance with legal and regulatory requirements.
- **Property and Tenancy Management Data:** Property inventories, schedule of conditions, safety certificates (e.g., gas, electrical, EPC), utility meter readings, maintenance logs, and details regarding any permitted pets residing at the property.
- **Special Categories & Protected Data:**
 - **Right to Rent & Immigration:** By law (Immigration Act 2014), we must verify your legal right to reside in the UK. We physically inspect and copy original documents (e.g., passports or visas) or securely process your online Right to Rent Share Codes provided via the Home Office portal.



- **Health/Welfare:** We only process data regarding medical conditions or disabilities with your explicit consent to arrange property modifications or handle urgent welfare adjustments.
- **Children & Dependents' Data:** Where children under 18 or legal dependents reside in a property, we process basic identity information (such as names and dates of birth) supplied by a parent or guardian to comply with local housing safety, occupancy regulations, and licensing terms.

If You Fail to Provide Personal Data: Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract (for example, to grant or continue a tenancy). In this case, we may have to cancel your application or terminate our service, but we will notify you at the time.

3. HOW YOUR PERSONAL DATA IS COLLECTED

We use several distinct methods to collect data from and about you, including:

- **Direct Interactions:** Forms filled out by post, email, online portals, or details provided during phone calls, office visits, or property viewings.
- **Property Management Platforms (NRLA Portfolio):** We directly input and upload your tenancy agreements, personal details, deposit details, inventories, check-in records, and compliance certificates into our property management system, the **NRLA Portfolio platform**, to manage your residential tenancy administration seamlessly.
- **Third Parties & Public Sources:** Information received via residential property portals (OpenRent, Rightmove, Zoopla, Gumtree), credit reference bureaus, local authorities (Council Tax departments), the Department for Work and Pensions (DWP), utility companies, or law enforcement agencies.
- **Automated Technologies:** As you interact with our website, we automatically collect Technical Data via cookies and server logs.

4. COMMUNICATIONS, MONITORING & CCTV

- **Written Records:** In our legitimate interests to maintain business clarity and service standards, we retain records of all emails, text messages, and portal interactions to manage your tenancy and accounts effectively.
- **Telephone Calls:** Telephone conversations may be recorded electronically to protect our legitimate interests, provide concrete evidence of verbal business agreements, and monitor service quality.
- **Closed-Circuit Television (CCTV):** Where CCTV systems are active on residential building exteriors or within communal zones, they are operated strictly for the purposes of site security, resident safety, and the prevention or detection of crime. Footage is handled in compliance with ICO surveillance guidelines, is retained for a restricted timeframe (typically 30 days), and will only be reviewed or shared with third parties in the event of a security breach, safety incident, or a suspected material violation of tenancy agreements (such as unauthorized property subletting or criminal activity).

5. WHY WE USE YOUR PERSONAL DATA (LAWFUL BASES)

We process your personal data strictly when allowed by law. Most commonly, we rely on the following statutory legal frameworks (gateways):

- **Performance of a Contract:** To process your residential tenancy application, execute tenancy agreements, manage inventories, record rental transactions, and securely manage your tenancy files within our systems, including the NRLA Portfolio platform.
- **Compliance with a Legal Obligation:** To comply with strict statutory regulations (e.g., Gas Safety obligations, EPC tracking, Right to Rent checking, or mandatory tenant data handovers to utility/local licensing authorities).
- **Legitimate Interests:** To efficiently run our residential property management business, collect rent, protect property assets, recover outstanding debts, monitor safety compliance, and maintain building security.



- **Vital Interests:** To share crucial personal or next-of-kin information with emergency services in a life-threatening medical emergency.

6. DISCLOSURES AND SHARING OF YOUR INFORMATION

We will share information we hold with others where it is legally necessary. Key recipients include:

- **Software & Platform Providers:** Third-party property management platforms, specifically the **National Residential Landlords Association (NRLA) Portfolio software**, which securely hosts our tenancy database, compliance documents, and property inventories.
- **Utility Providers & Councils:** To ensure accurate billing and Council Tax account allocation during occupancy transitions.
- **Deposit Protection Schemes:** To legally secure and manage tenancy deposits.
- **Maintenance Contractors & Tradespeople:** To share necessary contact details so engineers can arrange safety inspections or property repairs.
- **Professional Advisors:** Our legal representatives, accountants, auditors, insurers, and banking institutions.
- **Public Authorities:** HMRC, the DWP (for Universal Credit/Housing Benefit tracking), and law enforcement agencies when legally requested or required for crime prevention.
- **Joint Tenants & Guarantors:** Sharing account statuses, rent arrears, or tenancy breach notices where liabilities are contractually shared.
- **Property Stakeholders & Corporate Buyers:** Future owners of the property (if selling), freeholders, or block managing agents where necessary for building maintenance.

Business Asset Transfers: We may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses. If a change happens to our business, the new owners may use your personal data in the exact same manner as set out in this privacy notice.

7. INTERNATIONAL TRANSFERS OF DATA

We store and process your personal data primarily within the United Kingdom. Where our cloud storage, email systems, or property management software utilize servers located outside the UK, we ensure that these transfers comply fully with UK data protection laws. We verify that these external service providers operate under formal UK Adequacy Regulations or utilize approved statutory safeguards to ensure your data receives an equivalent standard of protection.

8. DATA SECURITY AND RETENTION

Data Security: We use appropriate technical and physical organizational tools (firewalls, multi-factor authentication, secure specialised platforms like the NRLA Portfolio system, and locked filing systems) to protect data from unauthorized access, alteration, or accidental loss. We restrict data access strictly to personnel with a business need-to-know.

Retention Periods:

- **Successful Tenancies/Accounts:** Retained for the duration of the contract plus 7 years to satisfy legal limitation periods for civil claims, Anti-Money Laundering tracking, and HMRC tax tracking obligations. This includes records stored on cloud databases and the NRLA Portfolio platform.
- **Unsuccessful Applications:** If an application does not proceed, your data is safely and securely destroyed after 1 year.

9. YOUR STATUTORY LEGAL RIGHTS

Under data protection law, you have rights including:



- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.
- Please contact us at info@northamptonbusinesscentre.co.uk or Northampton Business Centre, Lower Harding Street, Northampton, NN1 2JL if you wish to make a request.

10. DATA PROTECTION COMPLAINTS

We operate an internal complaints process. If you have concerns regarding how we collect, store, or handle your data, please contact Mr. Andrew Wagstaff in the first instance so we can investigate and resolve your issue.

How to complain:

You can raise a data protection complaint through any of our standard contact methods (by post, email, or in person). However, to ensure it is triaged correctly, we recommend directing it to our Data Representative:

Contact: Mr Andrew Wagstaff

Address: Harlestone Property Ltd, Northampton Business Centre, Lower Harding Street, Northampton, NN1 2JL

Email: info@northamptonbusinesscentre.co.uk

Timeline & Escalation:

- We will acknowledge your data protection complaint within 30 days of receipt (as legally required).
- We will investigate your concerns without undue delay and keep you reasonably informed of our progress.
- We will notify you in writing of the final outcome and any remedial actions taken.
- If you are unhappy with our handling of your data complaint, or how it was investigated, you have the right to lodge a complaint directly with **the Information Commissioner's Office (ICO)**. You can contact them via their website at ico.org.uk or by calling **0303 123 1113**.

11. MARKETING OPT-IN (OPTIONAL)

Please check the box below if you wish to receive updates regarding other available properties from Harlestone Property Ltd:

[] I consent to receive property marketing updates via email/SMS/What's app.