



# HARLESTONE PROPERTY LTD – PRIVACY NOTICE

## 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 a 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, usernames, marital status, title, dates of birth, gender, National Insurance numbers, and vehicle registrations.
- **Contact Data:** Current and previous addresses, billing addresses, email addresses, and telephone numbers.
- **Financial Data:** Bank account details, payment card details, rent payment history, and deposit data.
- **Transaction Data:** Details about payments to and from you, and records of property services or business center utilities you have used.
- **Technical & Usage Data:** Internet protocol (IP) addresses, login details, browser types, time zone settings, operating systems, and analytical tracking detailing how you use our website.
- **Background & Verification:** Employment status, occupation, credit history, and references from previous landlords or employers.
- **Special Categories & Protected Data:**
  - *Right to Rent:* By law (Immigration Act 2014), we must physically inspect and copy original documents (e.g., passports or visas) to verify immigration status for all adult residents.
  - *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's Data:* Where children under 18 reside in a property, we process basic identity information supplied by a parent or guardian to comply with local housing safety and occupancy regulations.

**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.
- **Automated Technologies:** As you interact with our website, we automatically collect Technical Data via cookies and server logs.



- **Third Parties & Public Sources:** Information received via 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.

#### 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, social media 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 building exteriors or within communal zones, they are operated strictly for the purposes of site security, public 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 carry out our responsibilities under your tenancy agreement, including anything you request us to do with a view to you becoming a tenant or resident.
- **Compliance with a Legal Obligation:** To comply with strict statutory regulations (e.g., Gas Safety obligations, Right to Rent checking, or mandatory tenant data handovers to Welsh Water or local licensing authorities).
- **Legitimate Interests:** To efficiently run our property management business, collect rent, protect property assets, recover outstanding debts, and maintain building security. We ensure we balance any potential impact on you before processing data for this reason.
- **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:

- **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, password protection, secure specialised platforms, 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.
  - *Unsuccessful Applications:* If an application does not proceed, your data is safely and securely destroyed after **1 year**.

## 9. YOUR STATUTORY LEGAL RIGHTS

Under UK law, you possess explicit legal rights regarding your data. Exercising these rights is **free of charge** and requests must be answered within **one calendar month** (or 30 days under updated frameworks):

- **Request Access (Subject Access Request):** Receive a copy of the personal data we hold about you to verify we are processing it lawfully.
- **Request Correction:** Demand immediate rectification of incomplete or inaccurate data.
- **Request Erasure:** Ask us to delete personal data where there is no overriding legal obligation or compelling legitimate interest for us to continue processing it.
- **Object to Processing:** Challenge our reliance on a "legitimate interest" if you feel it impacts your fundamental rights and freedoms, or object to direct marketing.
- **Request Restriction:** Ask us to suspend processing your data (e.g., while verifying accuracy or during legal disputes).
- **Request Transfer (Data Portability):** Request a structured, machine-readable export of automated data you initially gave us consent or contract data for.
- **Withdraw Consent:** Revoke marketing opt-ins at any time.

## 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.

You also maintain the statutory right to escalate data protection complaints directly to the UK supervisory authority, the **Information Commissioner's Office (ICO)**:

- **Online Web Portal:** [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint)
- **Telephone:** 0303 123 1113

## 11. MARKETING OPT-IN (OPTIONAL)

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

I consent to receive property marketing updates via email/SMS.