
PRIVACY NOTICE FOR PETERSEN ASSOCIATES

Data controller: Petersen Associates Limited

1. Introduction

Petersen Associates understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

2. Information About Us

Petersen Associates Limited, registered in England under company number 7136991.

Registered address: The Old Post Office, Station Road, Congresbury, Bristol, BS49 5DY.

Data Protection Officer: Louise Petersen (Lpetersen@ppamltd.co.uk)

We are a member of Royal Institute of Chartered Surveyors

3. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

4. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 6, below.

5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a. The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b. The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c. The right to have your personal data rectified if any of your personal data held by us

is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.

- d. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e. The right to restrict (i.e. prevent) the processing of your personal data.
- f. The right to object to us using your personal data for a particular purpose or purposes.
- g. The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

6. What Personal Data Do You Collect and How?

We may collect and hold some or all of the personal and non-personal data set out below. We do not collect any 'special category' or 'sensitive' personal data, personal data relating to children or data relating to criminal convictions and/or offences.

We collect information including your name and contact details such as email, contact number, email and postal address when you engage with us.

If we are providing a service to you, or on your behalf, and where required by law we will collect identity documents which will include at least one form of photographic information.

To meet anti-money laundering and counter terrorist financing requirements we may collect additional information required to identify you. If we are dealing with a company, trust or charity, we may need to obtain personal information for the beneficiaries of the entity and those in a position of control. This will include, but is not limited to, identity and address documents. We may also need to collect information on other individuals who have an interest in the property who are not considered to be our customers.

Where we manage property on your behalf we will ask for emergency contact information to enable us to get in touch in the event there is a matter requiring your urgent attention.

If you are representing the property owner, where you are not the legal owner of the property we will request details from you as the consent to act.

Where you are a tenant in a building managed by us, we may need to share your personal information with the property owner, but will only do so where we have considered your own rights first.

Where we operate CCTV in a property, we may capture your image which would constitute your personal data

We need some information so that we can comply with our legal obligations. For example, we may need identity documents from you to meet our obligations to prevent fraud and money laundering.

If you do not provide the information required for these purposes, we will not be able to perform our contract with you and may not be able to provide services to you or continue to provide certain services to you. We will explain when this is the case at the point where we collect information from you.

7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. Below following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We May Use	Our Lawful Basis
Identify and complete due diligence checks for clients and tenants	Identification Documents: <ul style="list-style-type: none"> • Photographic Identification • Proof of Address • Name • Date of Birth 	Legal Obligation
Provide information to our trusted suppliers where we outsource specialist administrative and IT provision to third parties	Identification and contact details: <ul style="list-style-type: none"> • Identification documents • Individual name and contact details • Date of Birth 	Legitimate Interests necessary for us to operate the administrative and technical aspects of our business efficiently and effectively
Monitor the security of properties	<ul style="list-style-type: none"> • CCTV footage 	Legitimate Interests of protecting the property and ensuring the safety of visitors, tenants and clients

Other uses of your personal information

We will share personal information with our regulators, governmental, law enforcement authorities and with courts, tribunals and arbitrators as may be required from time to time in order to comply with our regulatory and legal obligations.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

The period for which we will keep your personal information will depend on the type of service provided.

Your personal data will be kept in line with Petersen Associates Data Retention Policy. The retention period may be longer than the period for which we are providing services to you where we have statutory or regulatory obligations to retain personal information for a longer period. Please contact us using the details below in Part 12 for further information about the retention periods.

9. How and Where Do You Store or Transfer My Personal Data?

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Information is stored on our secure property management systems. Access is restricted on our property management systems to those within the business who are required to have access to your information for legitimate business purposes;
- Hard copy documentation is stored in locked cabinets;
- Access to your personal data is limited to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

We will only store your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the [Information Commissioner's Office](#).

Please contact us using the details below in Part 12 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

10. Do You Share My Personal Data?

We may sometimes contract with third parties to supply products and/or services for administrative efficiency purposes such as where we outsource certain administrative functions this includes IT systems providers and IT contractors.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal

obligations, a court order, or the instructions of a government authority.

11. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it.

12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: accounts@ppamltd.co.uk.

Telephone number: 01934 830999.

Postal Address: The Old Post Office, Station Road, Congresbury, Bristol, BS49 5DY.

13. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on Petersen Associates web site. This Privacy Notice was last updated in March 2022.