

PRIVACY POLICY

Platinum Properties Ely

111 Lancaster Way, Ely, Cambridgeshire CB6 3NX

www.platinumpropertiesely.co.uk

Last updated: April 2025

Introduction

Platinum Properties Ely are specialists in the letting and management of residential properties in Ely and the surrounding area. We are committed to protecting the rights and freedoms of all individuals whose personal data we hold, and to processing that data safely, securely, and in full compliance with our legal obligations.

This policy sets out how we collect, use, store, share and protect personal data, and ensures that our team understands the rules governing their use of personal data in the course of their work.

Our data processing activities are governed by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Platinum Properties Ely is the data controller for all personal data processed under this policy.

We may amend this policy from time to time to reflect changes in legislation or our business practices. Any revised policy will be made available on our website at www.platinumpropertiesely.co.uk. We encourage you to review this policy periodically.

Types of Information We Collect

The personal data we collect may include some or all of the following, depending on the nature of your relationship with us:

- Full name (including previous names)
- Date of birth
- Present and previous addresses
- Telephone numbers and email addresses
- Gender
- Ethnicity and nationality
- National Insurance number
- Marital and residential status
- Bank account details
- Names and dates of birth of dependants
- Personal credit and financial history
- Bank and credit card statements
- Previous and current landlord details
- Previous and current employer details
- Salary details and payslips
- Insurance details
- Proof of identity and residency

- Health or medical information (only where directly relevant to our working relationship with you)
- Details of any disability or access requirements, where necessary to assist you
- Information pertaining to the business relationship between the parties
- IP addresses and website usage data

Where we are required to collect personal data by law (for example, to meet obligations under the Money Laundering Regulations 2017 or the Immigration Act) and you choose not to provide it, we may be unable to provide you with our services.

How We Collect Your Information

We collect information directly from you through standard application and tenancy forms, in person, over the telephone, by email, or via our website. We may also collect information through our affiliated partners and service providers.

Additional collection methods include:

- Your use of our website and those of our affiliated partners
- Responses to marketing or other communications
- Social media interactions
- Registration for a product or service
- Participation in an offer, programme or promotion
- Pre-employment or employment-related enquiries
- Third parties you have authorised to share your information with us

Why We Use Your Information

We collect, use and hold your information for the following purposes:

- To provide, administer and communicate about our property letting and management services
- To assess tenancy applications and fulfil our obligations under tenancy agreements
- To conduct credit checks, referencing, and identity verification
- To process payments and manage rental accounts
- To comply with our statutory, regulatory and legal obligations
- To protect against fraud, money laundering and financial crime
- To operate, monitor and improve our services, website and business practices
- To evaluate interest in employment and manage staff
- To fulfil other contractual and legitimate business obligations
- To respond to legal proceedings, regulatory investigations or lawful government requests

Our Lawful Basis for Processing

Under UK GDPR, we are required to identify a lawful basis for each processing activity. We process your personal data under one or more of the following bases:

Contract

Processing is necessary to perform or prepare a contract with you, such as a tenancy agreement or management contract.

Legal Obligation

Processing is necessary to comply with a legal obligation, such as anti-money laundering checks or immigration status verification.

Legitimate Interests

Processing is necessary for our legitimate business interests, including due diligence, fraud prevention, marketing, maintaining client records and improving our services — except where those interests are overridden by your rights and interests.

Consent

Where we rely on your consent, it will be freely given, specific, informed and unambiguous. You have the right to withdraw consent at any time, though this will not affect the lawfulness of any processing carried out before withdrawal.

Public Task

Where processing is necessary to carry out a task in the public interest or in the exercise of official authority.

Special Category Data

Where we process special category data — such as health or disability information — we do so only where strictly necessary and under the appropriate Article 9 condition of the UK GDPR. Such data is held with enhanced security measures.

Information We Share

We do not sell your personal data. We share information only where necessary to deliver our services or where required by law, and only with the following categories of recipient:

- Vetted affiliates and partners who assist in delivering our services
- Formally contracted service providers acting on our behalf
- Referencing and credit checking organisations
- Insurance providers
- Landlords and prospective landlords (where relevant to a tenancy)
- Local authorities and utility providers
- Regulatory bodies (including HMRC, The Property Ombudsman, and Propertymark)
- Prospective employers or landlords requesting references, with your written consent
- Legal and financial advisers where relevant to a transaction or dispute

Our current service providers include, but are not limited to:

- Microsoft / Apple
- Adobe
- Street.co.uk (property management software)
- Agent Connect
- One Broker (insurance)
- Blinc (referencing)

- Help the Move (tenant utilities and services)
- CRE Communications
- 8x8 (telephony)
- Gluedog
- The Depositary (tenancy deposit documentation)
- TDS Custodial (tenancy deposit scheme)
- myDeposits (tenancy deposit scheme)
- Canva (design and communications)
- Claude AI and ChatGPT (artificial intelligence tools — governed by our separate AI Policy)
- PDF Gear (document management)
- EstateTrak (property compliance)
- VistaSocial (social media management)
- InventoryBase (property inventory and inspections)
- Made Snappy 360 (property photography and virtual tours)
- Microsoft / Apple
- Adobe
- The Guild of Property Professionals
- ARLA | Propertymark
- Facebook / Instagram (Meta Platforms Ireland Ltd) — social media marketing and engagement
- YouTube (Google LLC) — video content and marketing
- TikTok (TikTok Technology Ltd) — social media marketing and engagement
- LinkedIn (LinkedIn Ireland Unlimited Company) — professional networking and marketing
- Google (Google LLC) — search, analytics and advertising services
- Other data hosting and cloud service providers

We contractually require all service providers to safeguard the privacy and security of personal data they process on our behalf, and authorise them to use it only as necessary to perform their services or to comply with legal requirements.

We may also share information where legally required to prevent harm, financial loss or fraudulent or illegal activity. In the event of a sale or transfer of our business or assets, your information may be transferred to the acquiring party, who will be contractually bound to protect it.

International Data Transfers

Some of our service providers — including cloud, software and communications providers such as Microsoft and Zoom — may process personal data outside the United Kingdom. Where this occurs, we ensure that appropriate safeguards are in place to protect your data to the standard required by UK GDPR.

Such safeguards may include transfers to countries with a UK adequacy decision, the use of the International Data Transfer Agreement (IDTA), or Standard Contractual Clauses approved by the Information Commissioner's Office. If you would like further information about any specific transfer, please contact us using the details at the end of this policy.

How Long We Keep Your Information

We retain personal data only for as long as is necessary to fulfil the purposes for which it was collected, including compliance with legal, regulatory, accounting or reporting obligations.

As a general guide, we retain the personal data of tenants, landlords and applicants for a period of six years from the end of the relevant tenancy, contract or business relationship. This reflects standard limitation periods under UK law and HMRC requirements. Employee data is retained for six years from the end of employment.

Where we are required by law to retain data for a longer period, or where there is an ongoing legal claim or regulatory matter, we will retain the relevant data for as long as is necessary. On expiry of the applicable retention period, data will be securely deleted or anonymised.

Personal Data Breaches

We have procedures in place to detect, investigate and report personal data breaches. In the event of a breach that is likely to result in a risk to your rights and freedoms, we will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of it, as required by UK GDPR.

Where a breach is likely to result in a high risk to you personally, we will notify you directly without undue delay. All staff are trained to identify and escalate potential breaches promptly.

Your Rights

Under UK GDPR and the Data Protection Act 2018, you have the following rights in relation to your personal data. We will respond to all valid requests within one calendar month of receipt.

Right of Access

You have the right to request a copy of the personal data we hold about you (a Subject Access Request), confirmation that we are processing your data, and information about how and why it is used. This right is free of charge and we will respond within one month.

Right to Rectification

You have the right to have inaccurate or incomplete personal data corrected. Where possible, we will make corrections within one month of your request.

Right to Erasure

Also known as the 'right to be forgotten', you may ask us to delete your personal data where there is no good reason for us to continue processing it, where you have successfully objected to processing, where you have withdrawn consent, or where processing was unlawful. Note that we may not always be able to comply where we have a legal obligation to retain the data.

Right to Restriction

You have the right to request that we restrict the processing of your personal data in certain circumstances — for example, where you contest its accuracy or object to processing. We may continue to store the data but will not process it further until the restriction is resolved.

Right to Object

You may object to processing based on legitimate interests or carried out for direct marketing purposes. Where you object to direct marketing, we will cease that processing immediately. For other legitimate interest processing, we must cease unless we can demonstrate compelling grounds that override your interests, rights and freedoms.

Right to Data Portability

Where processing is based on consent or contract and carried out by automated means, you have the right to receive your personal data in a structured, commonly used and machine-readable format, and to request that it be transferred to another organisation where technically feasible.

Rights in Relation to Automated Decision-Making and Profiling

You have the right not to be subject to decisions based solely on automated processing that produce legal or similarly significant effects. Where automated decision-making is used, you have the right to request human intervention, to express your point of view, and to have the decision explained to you.

Right to Withdraw Consent

Where processing is based on your consent, you may withdraw it at any time. Withdrawal of consent does not affect the lawfulness of any processing carried out prior to withdrawal.

How We Protect Your Information

The security of your personal data is important to us. Platinum Properties Ely maintains appropriate technical and organisational measures to protect personal data against accidental loss, unlawful or unauthorised destruction, access, disclosure or alteration. Our measures include:

- Secure physical storage for any paper-based personal data, with locked filing and shredding of documents when no longer required
- Password-protected computer systems with regular password changes and access controls
- Encrypted or password-protected portable storage devices, locked securely when not in use
- SSL encryption on our website for the transmission of personal data
- Remote shutdown and data removal capabilities on all portable devices
- Prohibition on the downloading or storing of personal data on personal devices
- Restricted access to personal data on a need-to-know basis
- Regular staff training on data protection obligations and procedures

Cookies and Website Usage

Our website uses cookies and similar technologies to improve your browsing experience and to help us understand how our site is used. Cookies may collect information such as your IP address, browser type, pages visited and time spent on the site.

You can control the use of cookies through your browser settings. For further details, please refer to our Cookie Policy, available on our website. Our website may also contain links to

third-party websites. We are not responsible for the content or privacy practices of those sites and encourage you to review their privacy policies independently.

How to Contact Us

If you wish to exercise any of your rights, raise a concern, make a complaint, or simply have a question about how we handle your personal data, please contact our Data Protection Administrator:

Maria Morgan, Data Protection Administrator

Platinum Properties, 111 Lancaster Way, Ely, Cambridgeshire CB6 3NX

Email: maria@platinumpropertiesely.co.uk

Please provide as much detail as possible to help us respond to your request promptly. We will aim to respond within one calendar month. If we cannot fulfil your request for lawful reasons, we will explain this to you as clearly as we are able.

Your Right to Complain to the ICO

If you are not satisfied with how we have handled your personal data, or if you believe we are processing it in a manner that does not comply with UK GDPR, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent data protection regulator.

Information Commissioner's Office

Website: www.ico.org.uk

Telephone: 0303 123 1113

Post: ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Document Change Log

Version 2.3 | April 2025 | Business address updated to 111 Lancaster Way, Ely CB6 3NX. Version 2.2 | April 2025 | Social media and Google platforms added to service provider list. Version 2.1 | April 2025 | Service provider list updated to reflect current suppliers. Version 2.0 | April 2025 | Updated to reflect UK GDPR and the Data Protection Act 2018; added Right to Data Portability; added data breach notification obligations; added international transfers section; added ICO complaints route; updated retention guidance; added cookies section; removed pre-Brexit EU GDPR references.

Version 1.0 | Original issue under GDPR 2018