

The Ruth Curzon Residential Letting Agency privacy notice provides information on how Ruth Curzon Residential Letting Agency (RCRLA), its representatives and certain 3rd-party providers collect, use, secure, transfer and share your information.

Ruth Curzon Residential Letting Agency is an independent letting agent and property management company, covering all the popular areas of Daventry and surrounding areas.

It has its office at 8 Willow Close, Woodford Halse, Daventry NN11 3RZ.

1 Types of Information Collected.

1. First Name	2. Middle Name(s)	3. Surname	4. Previous Name
5. Date of Birth	6. Present Address	7. Previous Addresses	8. Forwarding Address
9. Home Telephone	10. Mobile Telephone	11. Email Address	12. Marital Status
13. Passport Details	14. NI Number	15. UK National	16. How many Dependants
17. Dependants Name	18. Dependants DOB	19. Information on Pets	20. Bank Account Details
21. # Credit Accounts	22. Employer Details	23. Occupation	24. Salary / Income
25. Employment Length	26. Employment Type	27. Landlord Details	28. Rental Amount
29. Criminal Offences /Convictions	30. CCJs and Bankruptcy Data		

1.1 Methods of Collection

In the general conduct of business, RCRLA collects information relevant to the services being sought from:

- yourself
- next of kin
- spouse / partner / family member
- Employers
- Credit / Default Agencies
- Financial Institutes (Banks, Building Societies, Loan Agencies, Credit Card companies)
- through consent to third parties disclosing information about you to us that they have collected

Such information will generally be collected directly via the use of any of our standard forms, over the internet, via email, instant messaging, in our office or through a telephone conversation with you. We may also collect personal information through our affiliates.

In addition, you may choose to submit information directly to us via several methods, including:

- through RCRLA's website
- in response to marketing or other communications
- through social media
- by signing up for a RCRLA service
- through participation in an offer, program or promotion
- in connection with an actual or potential business or employment relationship with us

You may also agree to third parties disclosing information about you to us that those third parties have collected.

We, our service providers and partners collect certain information by using automated means, such as cookies, when you interact with our advertisements, or visit our websites, pages or other digital assets. The information we collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services on our website. The analytics providers that administer these services use technologies such as cookies to help us analyse how visitors use our website.

"Your Rights and Choices" section of this Privacy Notice specifies your ability, to opt out or limit the usage of the information collected.

1.2 Purposes of Collection

Generally, we will collect, use and hold your information for the purposes of:

- Assessing applications for, and providing RCRLA services
- Conducting business, developing relationships with RCRLA
 - Process payments / transactions including: Accounting, Authorisation, Clearing, Chargebacks, Auditing, Billing, Reconciliation, Collection, Complaints, Enquiries, Credit Checks and related dispute resolution activities.
- Protect against and prevent fraud, unauthorised transactions, money laundering (please see below), tax evasion, claims, other liabilities and manage risk exposure and agent /franchise quality, integrity, compliance and security of business processes
- Create and manage any accounts, associated authentication criteria (id's and passwords) you may have with RCRLA.
- Provide, administer and communicate with you about RCRLA products, services, offers, programs and promotions, their issuers, acquirers, retailers and partners.
- Compile business directories, including business contact information
- Operate, monitor, evaluate and improve our services, websites, and business.
 - Developing new products and services
 - Managing communications, assess effectiveness and optimisation of advertising
 - Functionality of our websites, applications and other digital assets
- Enforce RCRLA "Terms of Use", other legal rights as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over RCRLA or its affiliates.
- Comply with industry standards and RCRLA policies

Anti-Money Laundering

In addition to help you with a property related service we have to comply with certain regulations for example the "Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017" (referred to as "the Regulations"). RCRLA is required to obtain certain information from you to comply with the Regulations. The information provided will only be used by RCRLA in relation to complying with the Regulations and will not be shared with any other party unless we are required to do so under law.

1.3 Lawful basis of processing

RCRLA processes your information under the following:

- Contractual necessity: where you enter into a contract with RCRLA and we need to process your information as part of this contract
- Compliance with legal obligation: for example providing your details as part of protecting your deposit with a Tenancy Deposit scheme.
- Legitimate interests: some information is processed by RCRLA as part of its legitimate interests which include: Fraud, risk assessment, due diligence, network and information security, suppressions and managing opting out of communications, direct marketing, monitoring, web analytics, cloud storage, acquisitions, updating customer details, lettings, sales, financial services and other core products and service.

- Public interest: some information is processed in accordance with public interest such as providing your details to public authorities, e.g. the local Council for Council Tax purposes.
- Consent: where we process information under consent, we will seek your clear and unambiguous consent prior to processing your data

2 Information We Share

We do not disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- Landlords and landlord associates and sub processors
- Vetted affiliates and partners / Financial Institutions / Utility Companies / Insurance Companies for business facilitation to provide required services, such as maintenance work, insurance cover etc.
- Contracted service providers to perform services on our behalf:
 - Hosting Datacentres, Infrastructure, Applications (Development / Support), Cloud Services (Software as a Service - SaaS, Platform as a Service - PaaS, Infrastructure as a Service - IaaS)
 - Helpdesk, Call Centres etc.

These service providers safeguard the privacy and security of personal information they process on our behalf and we authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements

- District Councils
- Law firms
- Credit agencies, Her Majesty's Revenue and Customs (HMRC), and other relevant regulatory bodies
- Additionally, we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities.
- Perspective landlords requesting references via your written or verbal consent
- On websites, features can be accessed where we partner with other entities that are not affiliated with RCRLA. These include social networking, geo-location tools etc. are operated by third parties (indicated appropriately) who may use or share personal information in accordance with their own privacy policies. It is recommended that you review the third parties' privacy policies if you use the relevant features.
- RCRLA reserves the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets, with reasonable efforts for the acquirer protect / use your information consistent with our Privacy Notice. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.

2.1 How long do we keep your information?

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep your information for as long as necessary. We generally keep personal information for 7 years after last contact with you. However, RCRLA reserves the right to keep information for longer if we feel that this is in the legitimate interests of RCRLA.

2.2 International Data Transfers

RCRLA may transfer the personal information collected about you to recipients (e.g. Landlords) in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Privacy Notice or as otherwise disclosed to you at the time the data is collected.

2.3 Your Rights and Choices

Your rights regarding the sensitive / personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information, and how we communicate with you.

If you wish to confirm whether your data is being used or processed by RCRLA and/or obtain access to information we hold on you, please complete the “subject access request” form available from the RCRLA website: https://www.ruthcurzon.co.uk/subject_access_request.pdf

If you have any problems completing this form please use the contact details in section 3. below.

2.4 Access and Correction

You may have the right to:

- obtain confirmation that we hold personal information about you
- request access to and receive information about the personal information we maintain about you
- receive copies of the personal information we maintain about you

The right to access personal information may be limited in some circumstances by local law requirements.

To exercise these rights, please contact us as set forth below.

2.5 Update and correct inaccuracies in your personal information

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to information we hold about you:

2.6 Object to the processing of your personal information

If you would like to object to any processing of your information by RCRLA you can contact us outlining what processing of information you would like to object to.

2.7 Have the information blocked, anonymised or deleted

If you would like RCRLA to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like deleted, blocked or anonymised.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us as specified in the “How to Contact Us” section below.

2.8 Opting out of processing

You can at any time tell us not to send you marketing communications by

- ruth.curzon@hotmail.co.uk
- contacting RCRLA as indicated below.

2.9 Withdrawal of consent

If we obtain your information by consent you have the right to withdraw any consent you previously provided to us.

If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information.

RCRLA we will apply your preferences going forward. Doing so will mean that you cannot take advantage of certain RCRLA and affiliate products, services and promotions.

The right to consent removal may be limited in some circumstances by local law or contract requirements and you will be informed appropriately.

3 How to Contact Us / Complaints and Feedback

If you:

- have a complaint about a breach of your personal information, applicable privacy laws / principles or a concern about RCRLA privacy practices
- would like access and/or update information or preferences you provided to us,

You may e-mail us at:

ruth.curzon@hotmail.co.uk

Or write to us at:

Ruth Curzon Residential Letting Agency
8 Willow Close
Woodford Halse
Daventry
NN11 3RZ

If we fall short of your expectations in processing your personal information or you wish to make a complaint about our privacy practices, please contact us via the above details.

To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time.

If we cannot for lawful reasons complete your request we will explain this to you to the extent that we lawfully can.

3.1 How We Protect Personal Information

The security of your personal information is very important and RCRLA is committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

RCRLA stores personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information was collected, unless otherwise required or authorised by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

4 Updating this privacy statement

We will update this statement from time to time so we suggest that you review this statement at regular intervals. Where we undergo substantial changes to our privacy statement we will endeavour to inform you directly about these changes.

Date of Issue: April 2023