

This Data Protection Policy incorporates the **UK GDPR**, the **Data Protection Act 2018**, and the **Data (Use and Access) Act (DUAA) 2025/2026** requirements.

1. Governance & Accountability

- **ICO Registration:** We maintain an active registration with the ICO (Renewed annually).
- **Records of Processing (RoPA):** We maintain a live record of what data we hold (e.g., Landlord IDs, Tenant bank details, Applicant emails), why we have it, and where it is stored.

2. Lawful Bases for Processing

We only process personal data where a valid legal gateway exists:

- **Contractual Necessity:** To perform our service (e.g., managing a tenancy or selling a home).
- **Legal Obligation:** To comply with Anti-Money Laundering (AML) checks and Right to Rent audits.
- **Legitimate Interests:** For standard business operations, such as following up on a viewing or property valuations (provided it does not override the individual's rights).
- **Consent:** Specifically for electronic marketing (newsletters/property alerts).

3. Data Subject Rights (Updated 2026)

In accordance with the **DUAA 2025**, we facilitate the following rights:

- **Right of Access (DSAR):** Individuals can request a copy of their data. We will respond within **one month**. Under 2026 rules, we may "stop the clock" if we reasonably require clarification to fulfill a complex request.
- **Right to Complain:** (Effective June 2026) We maintain a specific internal **Data Protection Complaints Procedure**. We must acknowledge receipt within **30 days** and provide an outcome without undue delay.
- **Right to Erasure ('Right to be Forgotten'):** We will delete data upon request unless a legal obligation (e.g., AML records) requires us to keep it.

4. Data Retention Schedule

We do not keep data longer than necessary. Our standard retention periods are:

Record Type	Retention Period	Reason
AML Checks / ID	5 Years from end of relationship	Money Laundering Regulations
Sales/Lettings Files	6 Years post-completion/tenancy	Limitation Act (Contractual claims)
Unsuccessful Applicants	12 Months	Potential discrimination claims
Marketing Leads	2 Years or until Opt-out	Legitimate interest/Consent

5. Security & Breach Notification

- **Technical Measures:** We use Multi-Factor Authentication (MFA) on all CRMs and email accounts. Digital files are stored in encrypted cloud environments.
- **Physical Security:** Paper files (where used) are kept in locked cabinets with restricted access.
- **Breach Reporting:** Any "high risk" data breach (e.g., accidental disclosure of a tenant's financial statement) must be reported to the ICO within **72 hours** of discovery.

6. Third-Party Sharing

We only share data with vetted third parties (Processors) such as:

- Referencing agencies and inventory clerks.
- Contractors for essential repairs (Property Management).

- Anti-money laundering software providers.
- Conveyancers and other agents in a property chain.