



PMC

PROPERTY
MANAGEMENT
& LETTINGS

Privacy Policy & How PMC Handles Data

Issued June 2020

PMC Property Management & Lettings Ltd. hereinafter referred to as PMC. Registration No: 156893 with its Registered Office at PMC House Little Square Oldmeldrum Aberdeenshire AB51 0AY Scotland considers the privacy and protection of your information seriously. This policy explains how and why we collect information about you and how it is used. Please read this policy carefully. Further, by using the PMC website and PMC services you are accepting the terms of this policy concerning the information collected by us about you.

Personal Data

Collection of Personal Information

In the course of our services to you we will collect any of the following information without limitation:

- Name
- Address, email address, telephone number
- Emergency contact information
- Bank account, credit card, debit card, expiry dates
- Details of properties we manage on your behalf
- Details of existing and prospective tenants of properties you own

Personal data submitted by you to PMC is used solely for the purpose stated to you at the time the data was requested from you. PMC does not give your personal data to anyone else or organisation unless it is necessary to do so in order to provide the service requested by you or PMC has in advance made a full disclosure to you, or we have a good faith belief that disclosure of such information is reasonably necessary to satisfy any applicable laws or regulations or in response to a request from law enforcement authorities or to detect and prevent fraud, security, or technical issues. By being a legally contracted customer of PMC, you consent to us holding and disclosing your personal data to third parties for these purposes only. Any personal data you submit will not be sold, traded, or rented under any circumstances without your prior consent.

The e-mail address that you supply when you become a customer of PMC will be used to contact you regarding your account. For example, when applicable; if you forget your username or password and request assistance with logging in, assistance will be provided by means of a message sent to the e-mail address entered in your user profile.

Head Office

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VAT No: 852 8746 88



At times the PMC website may contain links to the website of a third-party vendor that we have retained to perform services on our behalf (for example, the filling out of online forms or when making an online payment). You will know that you are on a third-party vendor's website because it will have a different appearance and your browser's address bar will change. When we select third-party vendors, and periodically thereafter, we inspect their privacy and data protection policies to ensure that they meet the same standards we use for our own policies. If you have questions about a third-party vendor's policies, please see the policy listed on their website.

Data Protection Statement

PMC Property Management & Lettings Ltd. respects individuals' rights of privacy based upon current (2017) European and United Kingdom law. The PMC organisation recognises the necessity of open and frank communication and the collection of personal and sensitive personal data in order to administer to the needs of our customers and prospective customers, and the corresponding necessity to maintain confidentiality and ensure that information is adequately protected. Recent additions to our responsibility under the General Data Protection Regulations (GDPR) enacted data protection laws to ensure individuals' rights of privacy. PMC has a longstanding history of respecting privacy rights and maintaining confidentiality, even before the enactment of such data protection laws. PMC will continue to protect information disclosed to it in accordance with its longstanding practice, now recorded in this policy.

Scope of Application

This policy applies to all PMC data at head office and other PMC locations.

Data Protection Principles

PMC handles all personal data in accordance with the following principles:

1. Personal data will be processed in a fair and lawful manner.
2. The legal basis for the processing of your data is founded upon the performance of contract through a formal appointment or custom and practice acceptance of PMC as the lawful property manager for the heritable property of which your property forms a common liability share as defined in the Deed of Conditions pertaining to the common parts of your property and its environment.
3. You have granted us consent to hold and process your personal data by becoming a customer of PMC either through the purchase of a property through a developer or through the process of appointment of PMC as

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property manager by means of a valid vote by a quorum of owners collectively seeking to appoint PMC as property manager.

4. Personal data will be collected, processed, and used only to the extent necessary to fulfil PMC undertakings and obligations to its customers this includes requests for services made by its customers.
5. Personal data will be accurate and kept up to date. Any error will be corrected as soon as possible after the organisation becomes aware of it.
6. Personal data will be kept only for as long as is necessary for the legitimate purpose(s) of PMC and in compliance with current law concerning the retention of data records.
7. Due consideration will be given to respect the rights of data subjects.
8. Appropriate technical and organisational measures will be taken to prevent unauthorized or unlawful disclosure of personal data. All computer-held personal data is held on password protected computers to which only authorised users hold passwords. Offices are locked after office hours and only authorised staff may gain entry.
9. Personal data will not be transferred to other organizations unless necessary to accomplish the transfer of operational information and customers have consented by virtue of their free and willing decision to appoint a different manager for their property. Consent to disclose information to a third party manager is not automatic and will always be requested in advance of such disclosure.

Rights of the Data Subject

1. A data subject's right to the protection of personal and sensitive personal data and to the correction or deletion of personal and sensitive personal data is to be granted to each customer as set forth in this policy.
2. Whoever makes a request according to this section must provide sufficient documentary evidence of their identity. Such requests must be made in writing.
3. If a data subject requests access to, correction of, or deletion of personal data or sensitive personal data about himself, PMC will fairly consider granting the request by balancing the interests of the individual in gaining access or correcting or deleting data against the legitimate commercial interests of PMC, including whether granting the request would endanger PMC's legitimate obligations, undertakings and services to other customers.
4. PMC has an interest and a lawful obligation in permanently maintaining certain data regarding historical property information. Deleting such information would unduly infringe on the ability for PMC to carry out of its legal obligations.

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Right of Appeal

If a person believes their rights have been infringed, they can appeal to the Managing Director by means of a written personal letter. The letter must be sent within two weeks of the action that forms the basis of the appeal.

Security

We take the security of your personal data very seriously. We protect your personal data that we hold and during transit using encryption such as Transport Layer Security (TLS). We use computer systems with limited access housed in facilities using physical, electronic, and procedural security measures to protect the confidentiality and security of information transmitted to us.

Payments – Online – By Telephone

For online payments and telephone transactions, we process your name and customer identification information together with a property identifier. To process payments via credit/debit card, we use accredited third party online payment processing services with world-class security and data privacy policies. PMC does not store your credit/debit card information. PMC as the payment recipient will retain the record of the financial transactions in line with our retention statement (see below). This includes records of the date of the payment, amount paid, and method of payment. This will enable us to meet with accounting standards and respond to any questions from you that arise during that period.

Payments – By Cheque

If you make a payment by cheque sent through the mail, we collect your name and customer identification information together with a property identifier. PMC will store a redacted electronic image of your cheque and this will be filed in your account in our computer systems. PMC as the payment recipient will retain the record of the financial transactions in line with our retention statement (see below). This includes records of the date of the payment, amount paid, and method of payment. This will enable us to meet with accounting standards and respond to any questions from you that arise during that period. The stored data image is within the PMC computer systems with limited access housed in facilities using physical, electronic, and procedural security measures to protect the confidentiality and security of information provided to us.

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Payments – Other (Direct Debit or BACS/EFTs)

By signing and returning to our office a direct debit mandate form you have authorised us to process your data in accordance with your instructions by means of a direct debit banking system third party provider. Your account details are kept in a password protected digital environment. Your account details are accessed only to carry out your payment instructions to collect payments by the direct debit banking system. PMC as the payment recipient will retain the record of the financial transactions in line with our retention statement (see below). This includes records of the date of the payment, amount paid, and method of payment. This will enable us to meet with accounting standards and respond to any questions from you that arise during that period.

Other Information

You may submit personal data (such as your name, postal address, and telephone number) for purposes other than making payments or creating a customer account (such as responding to a consultation document). PMC will collect, store, and use this information only for the purposes for which you submitted it and only as long as you remain a customer with an active account.

Pseudonymisation

Where possible and practical PMC will adopt pseudonymisation of data. This means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject (a person) without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Cookies and Similar Technologies

PMC collects certain information by automated means when you visit our website through Google Analytics. We collect this information through "cookies," "web beacons," and similar technologies. Use of the term cookie in this privacy policy is broad and includes similar technologies like "local storage." Like most websites, when you visit this website a small amount of data known as a "cookie" may be stored on your mobile phone, tablet, or computer's hard drive. There are various types of cookies which perform different functions and generally improve your experience on the website. We may use cookies to tell us whether you have visited the website before or to remember preferences that are chosen by you when using the website. We do not use cookies for advertising.



The types of cookies used on this website can be classified into one of three categories:

1. **Strictly Necessary Cookies** - These are essential in order to enable you to use certain features of the website, such as logging in or submitting forms on the website. Without these cookies, services you have asked for, such as making leaving a post, making payments, cannot be provided. These also include cookies that allow us to provide a service explicitly requested by you during a browser session. These cookies don't gather information about you that could be used for marketing or remembering where you have been on the Internet.
2. **Functionality Cookies** – These are used to allow the website to remember choices you make (such as your username, or region you are in) and provide enhanced features to improve your web experience.
3. **Analytical Cookies** - These are used to collect information about how visitors use this website, for instance the number of visits or the average duration of a visit to this website. The information is only used to improve how this website works.

Some cookies are first-party cookies which are set by our website. Others are third-party cookies set by a different domain. We use only first-party cookies, except for the use of third-party cookies associated with Google reCAPTCHA. Google reCAPTCHA is used to distinguish human users from computers in order to prevent automated spam. Please see Google's privacy policy at <http://www.google.com/intl/en/policies/privacy/>

Web Beacons

Pages of our website may contain small electronic files known as web beacons that allow us to record activity, such as when you visit a certain page. Web beacons are used to track usage of this website and monitor its performance.

Use of IP addresses

An IP address is a numeric code that identifies your computer on the internet. We use your IP address and browser type to help analyse usage patterns and diagnose problems on this website and to improve the service we offer to you.

Your Choice

Most browsers allow you to turn off cookies or to receive a warning before a cookie is stored on your device. Please refer to your browser instructions to learn about how to do this. Please note, however, that without cookies you may not be able to take full advantage of all of our website features.



Active Scripting or JavaScript

Scripting is used to improve the functionality of the site. Using scripting technology allows the site to return information more quickly to you. Scripting is never used by the site to install software on your computer or to collect unauthorised information from you. Active scripting or JavaScript must be enabled in the browser for some portions of the site to work correctly. Most browsers allow this feature to be enabled or disabled for specific sites. Consult the browser help documentation to learn how to enable scripting for selected sites.

Your Rights

Your use of the PMC Website, including the downloading of any forms, is provided free of charge. You are not required to open an account, make a payment, or take any action that requires providing personal data in order to benefit from the website. However, if you voluntarily decide to open an account, make a payment, request a customer service visit, or otherwise take any action that involves providing personal data, you consent to this Privacy and Cookies Policy; the storage of data on servers located in the United Kingdom; the collection, processing, transfer, and storage of your personal data by PMC Property Management & Lettings Ltd. as needed to process your requested action. If ever it proves necessary to change our Privacy and Cookies Policy, we will post those changes on this page on our website so that you are always aware of what information we collect and how we use it. To the extent required by law, you may have additional rights in relation to your personal data. This could include the right to access, correct or delete the personal data you have provided to us through this website. Should you require to see the data PMC holds about you please contact in writing to

The Managing Director
PMC House
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In certain circumstances we may need to record your telephone call to PMC to monitor for training, customers service or quality assurance purposes. In every occasion if this is necessary we will notify you in advance that the call is to be recorded. For example; this would apply when you give verbal instruction to arrange a direct debit facility or authorise works.

Consent

PMC holds, processes and stores your data based upon your agreement to be a proprietor of a property that PMC is appointed as property manager or lettings agent. By your purchase or leasing of a property managed by PMC you are opting into a legally binding contract thereby giving consent. The Deed of Conditions or

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the Lease Agreement provides PMC with the legal basis to acquire store and use your personal data.

Retention

PMC will retain your personal data for only as long as is necessary and based upon the type of record, the nature of the activity or service and the applicable legal or regulatory requirements.



Property
Managers
Association
Scotland



PMC Property Management & Lettings Ltd. is authorised and Regulated by the Financial Conduct Authority (Firm Reference No. 315094)
PMC Property Management & Lettings Ltd. is registered under the Property Factors (Scotland) Act 2011 (Licence Number: PF000100)
PMC Property Management & Lettings Ltd. is a Registered Letting Agent (LARN No 1909028)

PMC Property Management & Lettings Ltd. Registered in Scotland No. 156893. All Business is undertaken in accordance with our Standard Terms and Conditions of Trading.
Copies available on request.

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