

# Privacy Notice

## St Trinity Asset Management is committed to protecting your privacy

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### INTRODUCTION

In this Privacy Notice the terms, 'we', 'us' and 'our' are references to St Trinity Asset Management which is a trading name of St Trinity Limited (**St Trinity**), company number 07092652, having a registered address of Newcastle House, Albany Court, Newcastle Business Park, Newcastle upon Tyne NE4 7YB. St Trinity is part of the LSL group of companies of which the ultimate parent company is LSL Property Services plc (**LSL Group**).

### WHY ARE WE ASKING YOU TO READ THIS DOCUMENT?

This Privacy Notice sets out the basis on which any personal data we collect from you or you provide to us through our website (<http://www.sttrinityassetmanagement.co.uk>) (**Our Site**), or via other any other method by which you communicate with us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it, including:

- **What information is being collected about you?**
- **Use of the information we collect**
- **The legal basis upon which we use your information**
- **What is the source of the information we collect?**
- **Data retention**
- **Disclosure of information**
- **Third party websites**
- **Security**
- **Cookies**
- **Your rights**
- **Contact**
- **Complaints**

Your privacy is important to us, and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws.

By accessing, browsing or otherwise using Our Site you confirm that you have read and agree to this Privacy Notice. If you do not agree with any part of this Privacy Notice, you should not use Our Site or use our services.

We reserve the right to change the contents of Our Site, including this Privacy Notice at any time, by posting such changes on Our Site. It is your responsibility to familiarise yourself with the Privacy Notice regularly to ensure that you are aware of any changes. Your continued use of Our Site following the posting of any such changes will constitute your acceptance of the revised Privacy Notice.

This Privacy Notice was last updated on 30 April 2020.

### WHAT INFORMATION IS BEING COLLECTED ABOUT YOU?

We may collect personal information from you in connection with your use of Our Site, including such personal information as:

- cookie data which relates to your use of Our Site;
- data sent from your browser to our server which may include:
  - the time, date and duration of your visit to Our Site;
  - the site from which you have come (the referral URL);
  - the pages visited on Our Site; and
  - your IP address.

We may also collect information from you in connection with a service which we provide to you or one of our clients, including personal information such as:

- your name, postal address, phone number, email address, date of birth (where appropriate) and details of your requirements where we are engaged to provide asset management services on behalf of your lender;
- financial or other identifiers including your bank account details, tax URN number and income/expenditure details where we facilitate a financial transaction for you;
- your driving licence, passport, or other identification documents, when we need to check your identity for security purposes before providing you with access to a property;
- photographs of your property, when preparing an inspection report on the condition or value of your property, or when we are managing the repossession of a property.

There may be circumstances where we need to collect and process personal information from you which is of a sensitive nature. Where we do so we treat this information in accordance with the additional protection it is given under data protection laws. Sensitive personal information we collect may, with your consent, include details relating to your health in order that we can provide any additional support which you may need, or such other sensitive personal information as you may choose to voluntarily provide to us.

## **USE OF THE INFORMATION WE COLLECT**

Your information will be used by us in connection with the following purposes:

### **Providing Services:**

- To allow us to provide the asset management services that we are contracted to provide on behalf of our clients including but not limited to:
  - helping to sell your property;
  - maintenance and compliance services;
  - valuation services; and
  - energy performance certificates or home report inspections;
- to better understand your requirements and provide you with services specific to your needs;
- to improve our services by analysing your personal information so we better understand how you use our services;
- to keep our client records up to date;

### **Responding to Your queries:**

- to help answer any questions which you have asked one of our agents or staff members;

### **Improving Our Site:**

- to analyse cookie and website usage data to keep improving Our Site;

### **Legal and Regulatory Obligations:**

- to comply with applicable laws where we are obliged to retain and/or disclose certain information;
- to investigate or address claims or complaints relating to your use of our services;
- for internal and external auditing purposes;
- to carry out anti-money laundering checks and to meet any obligation we may have to undertake ongoing monitoring of the business relationship we have with you;
- to carry out right to rent checks;
- to comply with any other legal or regulatory obligations which apply to us;

### **Other:**

- to transfer information to any entity which may acquire rights in us;
- to collect a debt which is owed to us.

## THE LEGAL BASIS UPON WHICH WE USE YOUR INFORMATION

Wherever we collect or use your personal information, we will make sure we do this for a valid legal reason. This will be for at least one of the following purposes:

- *because it is necessary to fulfil the terms of our contract with you* - if you have entered into a contract with us for example to provide you with asset or property management services;
- *because it is necessary to support the legitimate interests of our business to provide you with an efficient service that meets your needs* - in all such cases, we will look after your information at all times in a way that is proportionate and respects your privacy rights and you have a right to object to processing as explained in the section on *Your Rights* below;
- *to meet responsibilities we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities*
- *where we have obtained a clear consent from you* - we will always make it clear when we need your consent and how you can change your permissions at any time thereafter.

If you would like to know more about the legal reasons or legitimate interests that apply to a particular way in which we use personal information you can contact us at any time.

## WHAT IS THE SOURCE OF THE INFORMATION WE COLLECT?

The majority of the personal information which we collect will have been voluntarily provided by you, however we may also obtain your personal data from other sources including:

- other LSL Group companies;
- our clients, and/or their advisers;
- third parties including credit reference agencies and law enforcement/regulatory bodies and companies who provide identification and verification services for money laundering compliance;
- online property portals such as Rightmove and Zoopla; and
- other publicly available sources such as the electoral roll and HM Land Registry.

## DATA RETENTION

The personal information that you provide will be retained by us in accordance with applicable laws and our internal Retention Policy. However, we will take reasonable steps to destroy or de-identify personal information we hold if it is no longer needed for the purposes set out above. We will only hold your personal information on our systems for as long as is necessary for the relevant purpose for which it was collected. A copy of our Retention Policy is available on request.

## DISCLOSURE OF INFORMATION

The information you provide to us will be held on our computers in the UK and may be accessed by or given to our staff or to any member of the LSL Group for the purposes set out in this Privacy Notice or for other purposes approved by you. We may also provide your personal information to other companies within the LSL Group and to LSL Group company franchisees for the purposes of administering our business or where services are provided by one LSL Group company to another pursuant to an intra-company services agreement.

We may also disclose your information to the third parties listed below for the following purposes:

- service providers who need to know the information in order to provide us or you with a product or service including our approved contractors for the purpose of carrying out maintenance;
- Estate Agents including for the purpose of marketing your property for sale to inspect the condition of your property or to carry out a valuation;
- law enforcement bodies and/or other regulatory entities in order to comply with any legal obligation or court order including the police, HMRC and local authorities;
- auction houses where the property you are buying or selling is being sold by auction;

- third parties we work with as part of providing our services and their associated companies and sub-contractors, including (but not limited to) IT administrators, inventory clerks, photographers, utility companies, surveyors and energy performance certificate companies;
- referencing companies to help prevent fraud and money laundering, the check will leave a soft ID footprint on your credit file which should not affect your credit rating;
- our professional advisers, for the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations; and
- third parties as necessary in the event of a claim or dispute relating to the use of our services.

These parties may be located in the UK or elsewhere in the world where different privacy laws may apply which may not offer the same level of protection as UK law. We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect any information held in that country and that the service provider acts at all times in compliance with applicable privacy laws.

### **THIRD PARTY WEBSITES**

Our Site may contain links to other websites. We accept no responsibility or liability for the content of other websites which are not under our strict control, in particular, we are not responsible for the protection and privacy of any information which you provide whilst visiting other websites and such sites are not governed by our Privacy Notice.

### **SECURITY**

We employ security measures which aim to protect the information provided by you from access by unauthorised persons and against unlawful processing, accidental loss, destruction or damage.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is sent to us.

### **COOKIES**

Our Site uses cookies (including cookies to obtain an overall view of visitor habits and visitor volumes to Our Site). To view more information on what cookies we use and how we use them please review our separate Cookies Policy which can be found at <http://www.sttrinityassetmanagement.co.uk/cookie-information.ashx>.

### **YOUR RIGHTS**

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information. Click on the links below to learn more about each right you may have:

- **[To access personal information](#)**
- **[To rectify / erase personal information](#)**
- **[To restrict the processing of your personal information](#)**
- **[To transfer your personal information](#)**
- **[To object to the processing of personal information](#)**
- **[To object to how we use your personal information for direct marketing purposes](#)**
- **[To obtain a copy of personal information safeguards used for transfers outside your jurisdiction](#)**
- **[To lodge a complaint with your local supervisory authority](#)**

If you wish to access any of the above-mentioned rights, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal information to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us using the details in the *Contact* section of this Privacy Notice. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

### **Right to access personal information**

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of; (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred.

### **Right to rectify or erase personal information**

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in the following limited circumstances:

- where it is no longer needed for the purposes for which it was collected; or
- where you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see right to object); or
- where it has been processed unlawfully; or
- to comply with a legal obligation to which we are subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

### **Right to restrict the processing of your personal information**

You can ask us to restrict the processing of your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but you still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

### **Right to transfer your personal information**

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

### **Right to object to the processing of your personal information**

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

### **Right to object to how we use your personal information for direct marketing purposes**

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

### **Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction**

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

### **Right to lodge a complaint with your local supervisory authority**

You have a right to lodge a complaint with our supervisory authority (the contact details for which are set out in the *Complaints* section of this Privacy Notice) if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

## **CONTACT**

If you have questions or comments about our Privacy Notice or if you wish to exercise your rights mentioned above, please contact us by:

**Email:** [dataprotection@lsips.co.uk](mailto:dataprotection@lsips.co.uk);

**Post:** Data Protection Team, Newcastle House, Albany Court, Newcastle Business Park, NE4 7YB; or

**Telephone:** 0191 233 4073.

## **COMPLAINTS**

If you have any concerns or complaints as to how we have handled your personal data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.