

Spenbeck GDPR Privacy Policy

This statement applies on and from 25 May 2018.

Spenbeck Limited (**we, us, our**) is committed to protecting and respecting your privacy. This statement (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to 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.

1. Contact Details

For the purpose of the General Data Protection Regulation (GDPR), the data controller is Spenbeck Limited of:

- Second Floor, The Courtyard, 35-37 St. Mary's Gate, The Lace Market, Nottingham NG1 1PS
- enquiries@spenbeck.co.uk
- 0115 910 0101
- Company Number: 01573663

2. Type of Information Processed

We will collect and process the following data about you in the following ways:

- Information that you provide by filling in forms on www.spenbeck.co.uk (the **Site**). This includes information provided on our enquiry form, subscribing to our service, posting material or requesting further services, which may include your name, postal address, employer, work address, contact details and job function. We may also ask you for information when you report a problem with the Site
- If you contact us by email, we will keep a record of that correspondence
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them

- Details of your visits to the Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access

Email marketing

We use a third-party provider, Mailchimp, to deliver our updates, event invitations and other news and information. We gather statistics around email opening and clicks using standard industry technologies to help us monitor and improve our communications. For more information, please see Mailchimp's privacy notice.

Management Agent Databases

We use third-party managing agents to provide both our residential and commercial lettings and ongoing management. Through this we are party to personal information regarding contact names and addresses and sometime financial information as part of the required due diligence process on a need to know basis. For more information, please see Cavendish Residential and NG Chartered Surveyors' privacy notices.

3. Lawful Basis for Processing Personal Data

The GDPR requires that personal data shall be (and we make every effort to ensure this happens):

- a) processed lawfully, fairly and in a transparent manner
- b) collected for specified, explicit and legitimate purposes
- c) adequate, relevant and limited to what is necessary
- d) accurate and kept up to date, or erased without delay
- e) kept in a form which identifies people for no longer than is necessary
- f) processed in a manner that ensures appropriate security

4. How Your Personal Data is Used

Detailed below is a description of all the ways we plan to use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one legal basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Retention period (see further below)
To process and deliver our services: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Provide support and services	(a) Identity (b) Contact (c) Transaction	(a) Necessary for our legitimate interests (to recover debts due to us)	<i>Tenants</i> - For the duration of our contract with you, and all amounts have been paid, plus 3 years <i>Prospective Tenants</i> - For the duration of 3 years following your initial transfer of information
To manage our relationship with you which will include: (a) Notifying you about changes to our contract terms or privacy policy (b) Asking you to leave a testimonial, case study or take a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Necessary for our legitimate interests (to keep our records updated, to keep our terms and privacy policy updated, and to study how customers use our products/services)	<i>Tenants</i> - For the duration of our contract with you, and all amounts have been paid, plus 3 years <i>Prospective Tenants</i> - For the duration of 3 years following your initial transfer of information
To administer and protect our business and our site and our services	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)	<i>Tenants</i> - For the duration of our contract with you, and all amounts have been paid, plus 3 years <i>Prospective Tenants</i> - For the duration of 3 years following your initial transfer of information

To use data analytics to improve our site, and our services, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	<i>Tenants</i> - For the duration of our contract with you, and all amounts have been paid, plus 3 years <i>Prospective Tenants</i> - For the duration of 3 years following your initial transfer of information
To make suggestions and recommendations to you about properties or services that may be of interest to you	(a) Identity (b) Contact (c) Usage	(a) Consent (b) Necessary for our legitimate interests (to develop and our products and grow our business.)	<i>Tenants</i> - For the duration of our contract with you, and all amounts have been paid, plus 3 years <i>Prospective Tenants</i> - For the duration of 3 years following your initial transfer of information
To keep information in compliance with our legal obligations.	(a) Legal	(a) Legal obligation	For the duration of our contract with you, and all amounts have been paid, plus the amount of time required by the Legal Obligation

5. **Where we store your personal data**

When you make contact with us, your details will be added to our email database and the Outlook accounts of our staff. These are all secured and are upgraded when any updates and patches are produced by the suppliers. We need to store your details in these places so that you can be contacted if needed.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy statement.

All information you provide to us is stored on our secure servers. Where we have given you the password enabling you to access our Tenant Hub on the Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We will use all reasonable efforts to safeguard your personal information. Unfortunately, the transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6. **Uses Made of the Information**

We use information held about you in the following ways:

- To ensure that content from the Site is presented in the most effective manner for you and for your computer
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes
- To carry out our obligations arising from any contracts entered into between you and us
- To notify you about changes to our service
- If you are an existing registered user, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of previous interest to you

If you do not want us to use your data in this way please write to us at enquiries@spenbeck.co.uk or our postal address at Second Floor, The Courtyard, 35-37 St. Mary's Gate, The Lace Market, Nottingham NG1 1PS.

7. **Disclosure of Your Information**

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- If Spenbeck Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its members will be one of the transferred assets

- If we are under a duty to disclose or share your personal data to comply with any legal obligation, or in order to enforce or apply our website terms of use and other agreements; or to protect the rights, property, or safety of Spenbeck Limited, our shareholders, directors, employees or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

8. **Your Rights**

You have various rights with respect to our use of your personal data:

Access: You have the right to request a copy of the personal data that we hold about you. There are exceptions to this right, so that access may be denied if, for example, making the information available to you would reveal personal data about another person, or if we are legally prevented from disclosing such information. You are entitled to see the personal data held about you. If you wish to do this, please contact us at via [email](#) or in writing to Spenbeck Limited, Second Floor, The Courtyard, 35-37 St. Mary's Gate, The Lace Market, Nottingham NG1 1PS.

- **Accuracy:** We aim to keep your personal data accurate, current, and complete. We encourage you to contact us via [email](#) or in writing to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date
- **Objecting:** In certain circumstances, you also have the right to object to processing of your personal data and to ask us to block, erase and restrict your personal data. If you would like us to stop using your personal data, please contact us via [email](#) or in writing at the above address
- **Porting:** You have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format
- **Erasure:** You have the right to erase your personal data when the personal data is no longer necessary for the purposes for which it was collected, or when, among other things, your personal data have been unlawfully processed
- **Complaints:** If you believe that your data protection rights may have been breached, you have the right to lodge a complaint with the applicable supervisory authority, or to seek a remedy through the courts

9. **Right to Withdraw Consent**

If you have provided your consent to the collection, processing and transfer of your personal data, you have the right to fully or partly withdraw your consent.

You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us via [email](#) or in writing to Spenbeck Limited, Second Floor, The Courtyard, 35-37 St. Mary's Gate, The Lace Market, Nottingham NG1 1PS.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) for which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Withdrawal of consent to receive marketing communications will not affect the processing of personal data for the provision of our legal services.

10. **Access to Information**

GDPR gives you the right to access personal information held about you by making a 'subject access request'. Your right of access can be exercised in accordance with GDPR by contacting us via [email](#) or in writing to Spenbeck Limited, Second Floor, The Courtyard, 35-37 St. Mary's Gate, The Lace Market, Nottingham NG1 1PS.

You will need to provide government-approved photo ID as proof of who you are before asking to see a copy of your information. In general though, we keep your name, job title, organisation, phone, address and email details.

11. **Links to Other Websites**

This privacy statement does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit and before you submit any personal data to these websites.

12. **Changes to this Privacy Statement**

We keep our privacy statement under regular review. This privacy statement was last updated on 25th February 2021. Any changes we may make to our privacy statement in the future will be posted on this page.

13. **Contact**

Questions, comments and requests regarding this privacy statement are welcomed and should be addressed to enquiries@spenbeck.co.uk