



Swain Estate Management Ltd – GDPR Privacy Notice

PRIVACY POLICY

At Swain Estate Management Ltd, we are committed to protecting and respecting your privacy. This policy sets out how we will treat any personal data we collect from you.

Your Rights

We recognise you have rights as a 'data subject', and we have an obligation to uphold these. This privacy notice aims to outline how we maintain these rights. In particular it outlines:

- How we collect and process your information,
- Why we do this,
- How you can exercise your rights,
- Who to contact in the event you are unhappy with our performance,

Your information rights:

Right	Explanation
Right to be informed	This encompasses the obligation for us to be transparent in how we collect and use your personal data
Right of access	You have the right to access your personal data and supplementary information
Right to rectification	If the information we hold on you is inaccurate or incomplete, you can request we correct this.
Right to erasure	You can request we delete or remove personal data where there is no compelling reason for us to continue processing
Right to restrict processing	You have the right to request we cease processing your data, if: <ul style="list-style-type: none">• You consider it inaccurate or incomplete;• Where you object to processing and we are considering whether we have a legitimate interest to process it;• Where we don't need the data for the original reason we collected it, but may need it to support a legal claim.

Right to data portability	Where you have consented to our processing your data, or where the processing is necessary for us to deliver a contract, you can request a copy of that data be provided to a third party in electronic form.
Right to object	You have the right to object to our processing under certain circumstances. For example, you can object to: <ul style="list-style-type: none"> • Direct marketing (including profiling); and • Processing for purposes of scientific/ historical research and statistics.
Rights related to automated decision making including profiling	Where we apply automated decision making, we must: <ul style="list-style-type: none"> • Give you information about the processing, • Introduce simple ways for you to request human intervention, or challenge a decision, • Carry out regular checks to make sure that our systems are working as intended.

This privacy notice should outline how we are transparent in our processing. Please get in touch with us through the contact details detailed at the bottom of this document.

Information we collect

Please find below a summary of the information we collect and how we use this to deliver services to you.

Information we collect	Why we Collect this	How we process this
Client name, Home address, email addresses, and phone number	For the purpose of conducting business with the client.	Secure office filing systems, property management and accounts software.
Details regarding leases, tenancies etc. held by the client.	For the purpose of business with the client.	Secure office filing systems.
Information on Basic Farm Payment	To conduct business with the Rural Payments Agency on behalf of clients.	Copies of forms submitted are held in our secure office filing systems.
Data required for submission to Environmental Scheme.	To conduct business with Natural England on behalf of clients.	Copies of forms submitted are held in our secure office filing systems.

Financial Data for rent, service charge and other related payment collection.	To fulfil our client contract.	Financial data held in our secure office filing systems.
Prospective applicant name, address, email and telephone numbers.	To conduct our client rural agency business.	Electronic database held in our secure office filing systems.
AML evidence and proof of identification.	To conform to the UK Money Laundering Regulations 2017.	Once checked data is secured in our internal office filing system.
For some clients, we operate onsite CCTV systems (including sound recording) and may use fixed photography as well.	For the detection and prevention of crime. To identify and record breaches of covenant, anti-social behaviour, etc	Continuous loop recordings are held on secure recording equipment for a maximum of one month. Photographs will be stored in our electronic database held in our secure office filing systems.

Transfer of Data

Data may be shared with HMRC and solicitors or accountants as requested. Data may also be shared with the Rural Payments Agency and/or Natural England on claims forms.

Retention of Data

Data will be held for 7 years as legally required by the HMRC and for 6 years as required by the RICS for legal and financial agreements and information. Files are retained in archive; if you object to this retention, please contact us.

Automated decision making

We currently do not use any automated decision making in our processes.

Securing your information

Information is stored electronically on our secure office systems as audited by the RICS.

Contact Details

We recognise you may have questions on how we process and/or store your data, or may want to change either the data we hold on you or how we communicate with you in the future.

If you have given consent for processing, you are free to withdraw consent. To let us know this is the case, email gdpr@swainltd.co.uk. If you have any questions in respect of this notice, or would like to exercise your rights as a data subject: please contact gdpr@swainltd.co.uk or write to Data Protection Office, Swain Estate Management Ltd, Wincote, Upper Dunsforth, York YO26 9RU

If you are unhappy that we have not responded to your query adequately, or if you have a further complaint, the Information Commissioners Office can be contacted at <http://ico.org.uk> or by telephone on 0303 123 1113.

Version 1.2 - 01 November 2020