

## Guarantor Privacy Notice

Turner Scott Ltd is committed to protecting and processing your personal data in accordance with the General Data Protection Regulations and the Data Protection Act 2018 (the legislation). For the purpose of the legislation and your personal data, Turner Scott Ltd is the Data Controller, Stuart Nelson is the person responsible for data protection and can be contacted at 53 Highgate, Kendal, Cumbria, LA9 4ED or emailing [stuart.nelson@turnerscott.co.uk](mailto:stuart.nelson@turnerscott.co.uk).

The General Data Protection Regulations are to safeguard your personally identifiable information or personal data. This privacy notice will be regularly reviewed and updated.

### Information held

The personal data we process may include the information in column A of the attached appendix. Where the provision of data is a statutory, a contractual requirement or a requirement necessary to enter into a contract, a refusal to provide the data may mean that we are unable to work with the tenant you are proposing to guarantee.

To ensure that we provide the best service possible we will need to collect and retain certain personal data. The data may be collected and processed by those listed in columns B and F. How we source the data is identified in column C. We may source data from 3<sup>rd</sup> parties or via third parties e.g. Credit referencing company.

### Lawful basis of processing

Your personal data will be used for the activities in column D. There are 6 lawful basis of processing your data including consent, a legitimate interest, contract fulfilment, a legal obligation and a vital interest. For each usage of the data the lawful basis of the processing of your data will be identified in column E. A legitimate interest is when we have a business or commercial reason to process your personal data which needs to be balanced with your interests i.e. what is right and best for you.

Where we state that we have a legitimate interest, the fact that we have a legitimate interest and what that legitimate interest is, will be stated in column E, e.g. to keep in touch with you during this or any future tenancy.

### Online identifiers, IP addresses and cookie identifiers

Where you visit our website, we may collect information about your computer, including where available your IP address. Whilst this information does not identify you personally, it does fall under the category of personal data. Turner Scott cannot identify an individual from this data unless they apply to a service provider under a 'legitimate interest' request.

We may obtain information by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive and are set by Google Analytics and Add This social sharing. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site. You can find more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org)

We use Google Analytics to monitor the performance and effectiveness of our website. Google is considered to be a third-party data processor

This policy only applies to our site. If you leave our site via a link or otherwise, you will be subject to the privacy policy of that website provider. We have no control over that privacy policy or the terms of the website and you should check their privacy policy before continuing to access the site.

### Recipients of personal data

It will be necessary for us to process or share all or some of your personal data with a range of individuals, businesses and organisations and these may include those listed in column F.

## **Where is the data stored?**

Your personal data is stored in the way described in column G and the data is always stored within the European Union or outside of the European Union but with an organisation operating under the General Data Protection Regulations.

## **Retention period and criteria used to determine the retention period**

We will retain some elements of your personal data for up to the time defined in column H after your guarantor responsibilities end. What information can be anonymized will be when no longer required for either contractual fulfilment or a legitimate interest. If the lawful basis for processing your data was consent, then you may withdraw consent at any time.

## **Your rights**

You have a right of access to check your personal data to verify the lawful basis of processing. We are obliged to respond to an access request within 30 days and may not charge a fee unless the request is unfounded, excessive or repetitive. If a fee is charged it is to be a reasonable fee based upon the administrative cost of providing the information.

You have a right to rectification if the data we hold is either inaccurate or incomplete. If your data has been disclosed to third parties then we must inform them of the rectification, where possible.

You have a right to erasure of your data when consent is our basis of processing (the right to be forgotten). You may request that your personal data be erased, for example, where there is no compelling reason for its continued processing or where you withdraw consent. We will comply with your request unless we have another basis of processing justifying our retaining the data (for example a legal requirement or the defence of a legal claim).

You have some rights to ask us to restrict processing i.e. to block or suppress processing where, for example, the data may be incorrect and whilst the accuracy is verified. We are permitted to store the data.

## **Your right to object**

You do have a right to object to further processing of your personal data. We may be required to stop processing unless there is some other legitimate basis of processing such as a legitimate interest or a requirement for the exercise or defence of a legal claim.

## **Withdrawal of consent**

Where the lawful basis for processing is your consent, you may withdraw consent at any time by writing to Stuart Nelson at Turner Scott Ltd or emailing [stuart.nelson@turnerscott.co.uk](mailto:stuart.nelson@turnerscott.co.uk)

## **How to lodge a complaint with the supervisory authority**

The supervisory authority responsible for data protection is the Information Commissioners Office (ICO) to whom concerns may be reported by phone on **0303 123 1113** or +44 1625 545 745 if calling from outside the UK, by email using the form on the website [ico.org.uk](http://ico.org.uk) or the live chat function.



Appendix

**Data controller**

A	B	C	D	E	F	G	H
Information held	Who is collecting it	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How stored	When will it be deleted
<b>Guarantor Applicant name</b>	Staff	Face-to-face, application form, telephone, email	To add to property management software	Contract fulfilment	Staff, server backup, software provider, landlord	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
			To be able to contact applicant	Contract fulfilment	Staff, landlord, referencing company	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
			To give to or discuss with landlord	Contract fulfilment	Staff, landlord	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
			To create application process	Contract fulfilment	Staff, landlord, server backup, software provider	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
			To create guarantor agreement	Legal Obligation	Court services, solicitor, staff, landlord, server backup, software provider	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
			Referencing	Contract fulfilment	Staff, referencing company	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
<b>Guarantor Applicant contact details</b>	Staff	Face-to-face, application form, telephone, email	To add to property management software	Contract fulfilment	Staff, server backup, software provider	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
			To be able to contact applicant	Contract fulfilment	Staff, landlord, referencing company	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
			To create application process	Contract fulfilment	Staff, server backup, software provider, referencing company	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
			To create guarantor agreement	Contract fulfilment	Staff & landlord, server backup, software provider	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
			Referencing	Contract fulfilment	Staff, referencing company	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
			If legal action is needed	Contract fulfilment	Court services, solicitor, landlord, staff	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately



A	B	C	D	E	F	G	H
Information held	Who is collecting it	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How stored	When will it be deleted
Guarantor Applicant bank details	Staff	Face-to-face, email, telephone, guarantor application form	Referencing	Contract fulfilment	Staff, referencing company	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately
Guarantor debit/credit card details	Staff	Telephone	Take payments	Contract fulfilment	Staff	Card service provider	Immediately
Proof of home ownership	Staff	Paper	Referencing	Contract fulfilment	Staff, referencing company	Paper. Electronic	During tenancy and 6 years beyond/if application unsuccessful - immediately
Guarantor applicants next of kin details	Staff	Paper	Referencing	Contract fulfilment	Staff, referencing company	Paper. Electronic	During tenancy and 6 years beyond/if application unsuccessful - immediately
Guarantor applicants employer details	Staff	Paper	Referencing	Contract fulfilment	Staff, referencing company, landlord	Paper. Electronic	During tenancy and 6 years beyond/if application unsuccessful - immediately
Guarantor applicants proof of income	Staff	Paper, email	Referencing	Contract fulfilment	Staff, referencing company	Paper. Electronic	During tenancy and 6 years beyond/if application unsuccessful - immediately
Referencing report	Staff, referencing company	Online, email	To assess suitability	Contract fulfilment	Staff, referencing company, landlord, server backup, software provider	Paper. Electronic	During tenancy and 6 years beyond/if application unsuccessful - immediately
Guarantor applicant passport or other ID	Staff	Paper, electronic	To meet regulations	Legal Obligation	Staff, software provider, server backup	Electronic, software, paper	During tenancy and 6 years beyond/if application unsuccessful - immediately