

We are Clews & Co Limited and are a registered company in England with company number **[14504355]**. We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

Any questions regarding this Policy and our privacy practices should be sent by email to info@clewsco.co.uk or by writing to 2E Chapel Street, Walsall, WS3 1LJ

What type of information we collect from you and how

We obtain information about you when you provide it to us, use our website or occasionally, from third parties. we collect the following information about you:

- Prospective tenants and/or guarantor names, email address, date of birth, address (including any previous addresses, relationship to other prospective tenants, employment status, name of university or college where you are studying (if applicable));
- Tenant name, email address, telephone number, Date of Birth, address (including any previous addresses), marital status, National Insurance Number, nationality, next of kin, name of university or college where you are studying (if applicable), the name of friends that you are staying with (if applicable);
- Guarantor name, e-mail address, telephone number, Date of Birth, address (including any previous addresses), marital status, National Insurance Number, nationality, next of kin (if applicable);
- Property address; term, rent, deposit, utility and service responsibilities;
- The employment status of tenants and/or guarantors, address, contact details (including email, phone and fax numbers) of the employer/accountant, payroll numbers, length of employment, salary information (including any regular overtime or commission), and any other income received;
- Bank account details of the tenant and prospective tenants, including account number and sort code, and any hire purchase/loan agreements/credit cards or store cards that you have; and
- Any welfare benefits that you may be eligible for, or are currently on.

Why we need this information about you and how it will be used

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;
- to help you to manage your tenancy;
- to carry out due diligence on any prospective tenant and/or guarantor, including whether there is any money judgements against them, or any history of bankruptcy or insolvency;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our suppliers which may affect you; and
- for all other purposes consistent with the proper performance of our operations and business.

How your information used

We, may use your information:

- to carry out our obligations arising from any contracts entered into by you, or us
- to seek your comments on the services we have provided;
- to notify you of changes to our services;
- to send you communications which you have requested or that may be of interest to you;
- for administrative and business purposes;
- for advertising and analytical purposes;
- in connection with our legal rights and obligations;
- for certain additional purposes but only with your consent:-
- We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems only for so long as is necessary for the relevant activity, or as long as is set out in any relevant contract with you.

Sharing your information

We will not sell or provide your information to third parties other than to information processors with whom we have entered into contracts which require the information processors to comply in all respects with the requirements of this Privacy Policy and all legal requirements relating to information privacy.

We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- If we enter into a joint venture with or merge with a business entity, your information may be disclosed to our new business partners or owners;
- To carry out due diligence on you as a prospective tenant/ guarantor, including but not limited to the carrying out of affordability checks, due diligence checks and the obtaining of references from relevant parties, whose data you have provided;
- If you request so, your information shall be disclosed in order to determine if there are any money judgements against you, as the prospective tenant/guarantor, or to determine if they have a history of bankruptcy or insolvency;
- If you are unable to make payments under your tenancy, your information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you as a tenant; and
- In the creation, renewal or termination of the tenancy, your information will be disclosed to the relevant local authority, tenancy deposit scheme administrator, service/utility provider, freeholder, factor, facilities manager or any other relevant person or organisation in connection with this.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Information we collect when you visit or create an account on our websites

We use cookies and other technologies to collect information when you visit our web sites, including when you make use of our online chat.

We may collect personal information in connection with your use of our website, such as:

- Your name, email address, telephone number and property address when you register for an account or use an online form to arrange a viewing, register for property alerts, request a valuation or lettings consultation, or submit an inquiry
- Details included on any inquiry form you submit in relation to property insurance, life, critical illness or income protection, conveyancing or mortgages
- Data sent from your browser to our server which may include:
- The time, date and duration of your visit
- The site from which you have come (the referral URL)

- The pages you have visited and
- Your IP address

How long we keep your information

We will keep your information for as long as is reasonably necessary for the purposes set out in this privacy notice, and to fulfil our legal and regulatory obligations.

In certain circumstances we have a statutory obligation to keep your personal information for a set period of time, for example, financial information (7 years) for financial auditing purposes. Information is always retained in line with its purpose of processing and only for as long as necessary usually, information is kept for 7 years after last contact with you. However, this period may be extended dependent upon any legal or contractual obligations Clews & Co may be required to comply with, as well as any overriding business legitimate interests.

Transferring your information outside of the UK

The information which you provide to us may be transferred to countries outside the United Kingdom (“UK”) if any of our servers or our processors’ servers are located outside the UK. Countries outside the UK and countries within the European Free Trade Area (EFTA”) may not have equivalent information protection laws to those within the UK. By submitting your personal information, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the UK or EFTA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

Telephone and website recording

We may record telephone calls. We may also use web site recording services which may record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. Information collected is for our internal use only. The information collected is used to improve our website useability and is stored and used for statistical reporting.

Your rights

You have the right at any time to:

- ask for a copy of the information about you held by us in your records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of yours we hold; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above you can contact us at Info@Clewsco.co.uk

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance, you can find out how to do this in our in house complaints policy. You also have the right to complain to the Information Commissioner’s Office in relation to our use of your information. The Information Commissioner’s contact details are noted below:

England:
Information Commissioner’s Office
Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF
Telephone: 030 123 1113
Email: casework@ico.org.uk

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.

We have CCTV at our premises

We keep this policy under regular review. This was updated on 23/05/2023