**Privacy policy**

This privacy policy applies between Kent Property Services (“KPS”) the owner and provider of this website and our valued local authority clients, their clients, our direct tenants, users of this website and users of the KPS App.
KPS takes the privacy of your information very seriously. This privacy policy applies to our use of any and all data collected by us in our business of providing accommodation, or provided by you in relation to your use of our website or the KPS App.

**Please read this privacy policy carefully.**

**Definitions and interpretation**

1. in this privacy policy, the following definitions are used:

|  |  |
| --- | --- |
| Data | Collectively all information that you submit to KPS via all mediums, in dealing with us in the course of applying for accommodation and subsequently becoming a tenant of ours.  |
| Data Protection Laws | Any applicable laws relating to the processing of personal data, including but not limited to the directive 96 forward slash 46 four slash EC (data protection directive) or the GDP are, and any national impending implementing laws, regulations and secondary legislation, for as long as GDP are is effective in the UK; |
| GDPR | The General Data Protection Regulation (EU) 2016/679; |
| KPS, we or us | John & Claire O’Neill, Kent Property Services, 32 Barleymow close, Chatham, Kent, ME5 8JZ; |
| User or you | Any third party that accesses the website or application and is not either (I) employed by KPS and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to KPS and accessing the website in connection with the provision of such services; And |
| Website | The website and or application you are currently using, www.k-p-s.co.uk and KPS android application, and any subdomains of this site unless expressly excluded by their own terms and conditions. |

1. In this privacy policy, unless the context requires a different interpretation:
	1. the singular includes the plural and vice versa;
	2. references to sub clauses, clauses, schedules or appendices are too subclauses, clauses combat schedules or appendices of this privacy policy;
	3. a reference to a person includes firms, companies, government entities, trusts and partnerships;
	4. including is understood to mean including without limitation;
	5. reference to any statutory provision includes any modification or amendment of it;
	6. the headings and subheadings do not form part of this privacy policy.

**Scope of this privacy policy**this privacy policy applies to the actions of KPS and our clients/tenants with respect to our day to day activities in providing residential accommodation and to users of our website and our App. It does not extend to any websites that can be accessed from this website including, but not limited to, any links we may provide social media websites.

1. For purposes of the applicable data protection laws, John O’Neill (KPS) is the data controller. This means that KPS determines the purposes for which, and the manner in which, your data is processed.

**Data collected**

1. we may collect the following data, which includes personal data from you:
	1. Name & previous addresses;
	2. Contact information such as email addresses and telephone numbers;
	3. Geo location data;
	4. Previous history as a tenant
	5. Financial history and means of paying rent
	6. History of anti-social behaviour an or damage to property or persons

in each case, in accordance with this privacy policy.

**How we collect data**

1. we collect data in the following ways:
	1. data is given to us by you; And
	2. data is collected automatically.

**Data that is given to us by you**

1. KPS will collect your data in a number of ways, for example:
	1. when you contact us through the website, by telephone, post, email or through any other means;
	2. when you complete surveys that we use for research purposes (although you are not obliged to respond to them):
	3. when you use our services;

in each case, in accordance with this privacy policy.

**Data that is collected automatically**

1. To the extent that you access the website or App, we will collect your data automatically, for example:
	1. we automatically collect some information about your visit to the website. This information helps us to make improvements to website content and navigation, and includes your IP address, that date, times and frequency with which you access the website and the way you use and interact with its content.
	2. We will collect Geo location data through our App with your permission, so as to prove occupancy of temporary accommodation on a weekly basis.

**Our use of data**

1. any or all of the above data may be required by us from time to time in order to provide you with the best possible service and experience when using our services. Specifically, data may be used by us for the following reasons:
	1. internal recordkeeping;

in each case, in accordance with this privacy policy.

1. We may use your data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (either section headed “Your Rights” below).

**Who we share data with**

* 1. we may share your data with the following groups of people for the following reasons:
	our employees, agents and or professional advisors –
		1. in order to provide the relevant housing authorities with evidence of living at specified property;
	2. relevant authorities - to facilitate ant- fraud policies in line with the appropriate housing council;

in each case in accordance with this privacy policy
**Keeping data secure**

1. We will use technical and organisational measures to safeguard your data, for example:
	1. access your account is controlled by password and username that is unique to you.
	2. Your data is on a network secure laptop.
2. Technical and organisational measures including measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your data, please let us know immediately by contacting us via this email address:

 **info@k-p-s.co.uk**

1. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org, Get Safe Online is supported by HM government and leading businesses.

**Data retention**

1. Unless a longer period is required or permitted by law, we will only hold your data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request it or data bit deleted.
2. Even if we delete your data, it may persist on backup or archival media for legal, tax or regulatory purposes.

**Your rights**

* 1. You have the following rights in relation to your data:
	Right to access the right to request (I) copies of the information we hold about you at any time, or (II) that we modify, update or delete such information. If we provide you with access to the information we hold value, we will not charge you for this, unless your quest is manifestly unfounded or excessive. Where we are legally permitted to do so, we may refuse request come. If we refuse your request, we will tell you the reasons why.
	2. Right to be correct the right to have your data rectified if it is inaccurate or incomplete.
	3. Right to erase the right to request that we delete or remove your data from our systems.
	4. Rights restrict our use of your data the right to block us from using your data or limit the way in which we can use it.
	5. Rights to data portability the right to request that we move copy or transfer your data.
	6. Right to object the right to object to our use of your data including where we use it for our legitimate interests.
1. To make enquiries , exercise any of your rights set out above, or withdraw your consent to the processing of your data (where consent is our legal basis for processing your data), please contact us via this email address: info@k-p-s.co.uk.
2. If you are not satisfied with the way a complaint you make in relation to your data is handled by us, you may be able to refer your complaint at a relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO contact details can be found on their website at https://ico.org.uk
3. it is important that the data we hold values accurate current. Please keep us informed if your data changes during the period for which we hold it.

**Links to other websites**

This website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend your use of such websites. You are advised to read privacy policy or statement of other websites prior to using them.

**Changes of business ownership and control**

1. KPS may, from times time, expand or reduce our business and this may involve the sale and all the transfer of control have all or part of KPS. Data provided by users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms at this privacy policy, be permitted to use data for the purposes for which it was originally supplied to us.
2. We may also disclose this data to a prospective purchaser of our business or any part of it.
3. In the above instances, we will take steps with the aim of ensuring our privacy is protected.

**General**

1. you may not transfer any of your rights under his privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
2. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other productions provisions this privacy policy will not be affected.
Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
3. This agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

 **Changes to this privacy policy**

1. KPS reserves the right to change his privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the website and you are deemed to have accepted terms at the privacy policy on your first use the website following the alterations. You may contact KPS by email at info@k-p-s.co.uk

**Attribution**

1. This privacy policy was created by John O’Neill t/a Kent Property Services (“KPS”) on the 5th of May 2020. Registered with the Information Commissioners office as : Organisation name: Mr John Henry O'Neill - Reference: ZA518498.