



# HML

## HML Group Privacy Policy

Your Property: Your Privacy!



At HML, we take your privacy very seriously and want to share our Privacy Notice with you to explain how we collect, store and handle your personal data.

### **Why we collect your data**

We want to provide you with the best possible service and the data we hold about you helps us to do this.

### **How we collect your data**

We do this in a number of ways, e.g. when you complete one of our communication preference forms, sign up for one of our newsletters or register with our online portal. We treat your data with the utmost care and take appropriate steps to protect it.

### **When we'll share your data**

Sometimes we need to share data with third parties to help us provide a better service, e.g. to the software company which looks after [www.myhml.co.uk](http://www.myhml.co.uk); if a contractor needs to contact you or if we need to involve solicitors or debt recovery agents regarding the collection of arrears.

### **Know your rights**

You have many rights regarding your personal data, including seeing what data we hold, and updating your information. If you'd like to find out more, please see our Privacy Notice below.



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### 1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how HML uses your data, e.g. processing rental demands or contacting you with information about your property in which you live.

### 2. Who are HML?

The HML Group is a property services company providing block and estate management and lettings services to residential developments and individual landlords around the UK. The HML Group is made up of several related businesses:

- HML Holdings Plc
- HML PM Ltd
- Shaw & Co (Surveyors) Ltd
- HML LAM Ltd
- HML Concierge Services Ltd
- HML Company Secretarial Services Ltd
- Alexander Bonhill Ltd (please [CLICK HERE](#) for link to separate Privacy Policy)
- Faraday Property Management Ltd

For simplicity, throughout this notice, 'we' and 'us' means the HML Group and its related companies.



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### 3. Explaining the legal bases we rely on

The law on data protection sets out a number of different reasons for which a company may collect and process personal data, including:

#### **Consent**

In specific situations, we can collect and process your data with your consent, e.g. when you tick a box to receive email newsletters. When collecting your personal data, we'll always make clear to you what data is necessary in connection with a service.

#### **Contractual obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations, e.g. we manage your property on behalf of our client under the terms of a management agreement. Our client is the landlord or investor who owns the property and has a tenancy agreement which states their and the tenants responsibilities we can act on their behalf in this respect. The tenancy agreement relating to your property provides for you to make a rental payment to our client and it is this money we use to administer this agreement.

#### **Legal compliance**

If the law requires us to, we may need to collect and process your data, e.g. we can pass on details of people involved in fraud or other criminal activity to law enforcement.

### 4. When do we collect your personal data?

- When do we collect your personal data?
- When you complete one of our communication preference forms
- Register with our online portal (HML Online Services)
- Sign up for one of our newsletters
- Visit our website
- When you engage with us on social media
- When you contact us by any means with queries, complaints etc
- When you choose to complete any surveys, we send you
- When you comment on or review our services
- When you fill in any forms which we have sent you
- When you've given a third-party permission to share with us the information they hold about you
- We collect data from publicly available sources (such as Land Registry) when you have given your consent to share information or where the information is made public as a matter of law



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## 5. What sort of personal data do we collect?

- If you have registered with our online portal: your name, property address, alternative contact address (if applicable), email address and telephone numbers. For your security, we'll also keep an encrypted record of your login password
- Details of your visits to our website and which site you came from to ours
- Information gathered by use of cookies in your web browser
- Bank account information
- Your comments and product reviews
- To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visit and any search terms you entered
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback

## 6. How and why do we use your personal data?

We want to provide the best possible letting service and data privacy law allows us to collect and use your personal data as part of our legitimate interest in understanding our customers and providing the highest levels of service.

If you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

It is important to note that if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to manage your property as effectively as we or our client would like.

### Here's how we'll use your personal data and why:

- To issue requests for rental payments and provide you with information about the property you rent or own.
- To respond to your queries and any complaints. Handling the information you have provided enables us to respond. We may also keep a record of these queries or complaints to help with any future communication and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to our client, our legal obligations, our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest, e.g. by checking your password when you log in and using automated monitoring of IP addresses, we try to identify possible fraudulent logins from unexpected locations.
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- If we discover any criminal activity or alleged criminal activity, we will process the data for the purposes of preventing or detecting unlawful acts. Our aim is to protect the individuals we interact with from criminal activities.



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- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web, text and telephone about relevant services.

***You are free to opt out of hearing from us by any of these channels at any time.***

- To send you relevant, personalised communications by post relating to the management of your development. We'll do this on the basis of our legitimate business interest.

***You are free to opt out of hearing from us by post at any time.***

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. If we do not use your personal data for these purposes, we would be unable to comply with our contractual obligations.
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests, e.g. we'll record your browser's Session ID to help us understand more when you leave us online feedback about any problems you're having.
- To comply with our contractual or legal obligations to share data with law enforcement, e.g. when a court order is submitted to share data with law enforcement agencies or a court of law.
- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our services more relevant to you.

***You are free to opt out of receiving these requests from us at any time by updating your preferences via our online portal.***

- To process any contractor visits, e.g. if you have reported a leak affecting your property, we may need to ask a contractor to visit your property to establish the cause of the leak and any resultant damage. We would need to share your details with this contractor to enable the issue to be resolved.

Here's more information on how we share personal data with third parties.

## **7. Combining your data for personalised direct marketing**

We want to provide you with the best possible service and from time to time may send you information about other services that may be of interest to you. For this purpose we also combine the data that we collect directly from you with data that we obtain from third parties to whom you have given your consent to pass that data onto us - such as the Land Registry mentioned above.



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## **8. How we protect your personal data**

We know how much data security matters to all our customers and we will treat your data with the utmost care and take all appropriate steps to protect it.

Access to your personal data is password-protected, and we secure access to all transactional areas of our websites using 'https' SSL encryption.

We regularly monitor our system for possible vulnerabilities or attacks; and carry out penetration testing to identify ways to further strengthen security.

## **9. How long will we keep your personal data?**

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

## **10. Who do we share your personal data with?**

We sometimes share your personal data with trusted third parties, e.g. contractors visiting your home, arrears management companies, when handling complaints, etc.

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

We provide only the information they need to perform their specific services. They may only use your data for the exact purposes we specify in our contract with them.

We work closely with them to ensure that your privacy is respected and protected at all times. If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- IT companies who support our website and other business systems.
- Operational companies such as contractors.
- Direct marketing companies who help us manage our electronic communications with you.
- Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites. See our Cookies Notice for details.
- Data insight companies to ensure your details are up to date and accurate.



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We will only share your data with third parties for their own purposes in very specific circumstances, for example:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government bodies, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

We may, from time to time, expand, reduce or sell the HML Group and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

For further information please contact our Data Protection Officer.

## **11. What are your rights over your personal data?**

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.

For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (such as the end of our management appointment).

- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You have the right to request a copy of any information about you that we hold at any time, and to have that information corrected if it is inaccurate. To ask for your information, please contact our Data Protection Officer at HML, 94 Park Lane, Croydon, CR0 1JB.

Or email [customerservices@hmlgroup.com](mailto:customerservices@hmlgroup.com) should you need to amend your information, please do so via our online portal, or contact our Customer Services team.

If we choose not to action your request we will explain to you the reasons for our refusal.



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### **Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### **Where we rely on our legitimate interest**

In cases where we are processing your personal data based on our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### **Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

### **Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

## **12. How can you stop the use of your personal data for direct marketing?**

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails.
- If you have registered with our online portal, log in to change your preferences.

Write to Customer Services, HML, 94 Park Lane, Croydon, CR0 1JB

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

## **13. Contacting the Regulator**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.





#### **14. Any questions?**

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

Email us at [customerservices@hmlgroup.com](mailto:customerservices@hmlgroup.com) or write to our Data Protection Officer at HML, 94 Park Lane, Croydon, CRO 1JB.

HML COMPANY DETAILS:

**HML LAM LTD**

9-11 The Quadrant,  
Richmond,  
Surrey,  
TW9 1BP

**Data Protection No: Z5541333**

**HML Holdings Plc**

9-11 The Quadrant,  
Richmond,  
Surrey,  
TW9 1BP

**Data Protection No: ZA155850**

**HML PM Limited**

**Data Protection No: Z9099520**

**Shaw and Company (Surveyors) Limited**

**Data Protection No: ZA229648**

**Alexander Bonhill Limited**

**Data Protection No: ZA155848**

**Faraday Property Management Limited**

**Data Protection No: Z9628495**