



Data Protection Policy for Just-Property Limited

Introduction

Just-Property Limited deals with sales, lettings, valuation and property management. Privacy and Data Protection Rights are very important to us.

In the course of our work with you, you give us information about yourself – we respect your trust in us to use, store and share your information in accordance with new laws – including GDPR related legislation. In this Privacy Policy, we explain how we collect personal information about you, how we use it and how you can engage with us about it.

Please be assured that the personal information you provide to us will only be used to ensure that you receive the best property services possible, that your data will be held legally, securely and in a compliant manner and that your information can only be assessed by those who require it for the delivery of our services.

Enquiries about this Data Protection Policy should be made to: Just-Property Ltd, 24 Thorncastle Street, Ringsend, Dublin 4. - Email to jcoughlan@just-property.ie or phone to **01 631 52 51**.

Who we are

When this notice mentions “we” or “us”, we mean the Property Services Limited Company operated by Justin Coughlan (Director) and Brendan McGrath (Director) and includes staff employed by them.

Justin Coughlan as Managing Director has overall responsibility for Data Protection within the Company and may be contacted by email or phone on the details given above; by calling to the office, or by writing to him at our office address.

Information and You

So that we can deliver effective Property Services to you, we must gather and use personal information about you. If you do not provide the personal information, we may be unable to provide the quality of service you seek.



Why do we collect your data?

We collect and use personal data information to provide the following services:

General:

- The provision of Customer Service, Enquiry Responses, Quotations and other follow up information on your request
- To manage vendor accounts and for accounting (payment) purposes
- To comply with Regulations and Statutory Obligations
- To provide personnel, payroll and pension administration services in connection with our employees
- To get and retain Clear and Opt-In Consent for further marketing follow up
- For provision of the enforcement of legal rights for the protection of both our interests
- For provision of Billing, Payment, Remittance or receipt/payment of money on your behalf

Estate Agent Service:

- In the provision of sales service by private treaty, by auction or by tender. Processing is necessary to enable us to keep in contact with the vendor and those that have made an enquiry for the subject property.
- To comply with the Property Services (Regulation) Act 2011.

Valuation Service:

- To comply with the Property Services (Regulation) Act 2011.
- To arrange access to the subject property.
- To speak with the applicant to seek information with regard to the subject property.

Letting Agent Service:-

- To prepare letting agreements
- To comply with Residential Tenancies Act 2006
- To comply with the Property Services (Regulation) Act 2011.
- To set up utility bills such as electricity and gas.
- To provide access for service engineers and white goods/furniture delivery
- To pass to landlord when the service being provided by the agent is a let only service.

Managing Agent Service:

- Processing is necessary for the performance of a contract to which the data subject is party
- Processing is necessary for compliance with a legal obligation to which the Data Collector is subject. In this instance the Management Company is required by the Companies Act 2014 to maintain adequate accounting records. Similarly, under the Multi-Unit Development Act 2011 (MUD Act) a unit owner is under an obligation to furnish the management company with the information. Failure to do so would constitute a breach of the MUD Act which could result in civil action.



Why do we collect information about you?

When you visit our Website

- Cookies are present to store statistical details (See Cookie Section)
- Google Analytics identity general data on what pages users access and long they stay
- You might submit Enquiries
- Contact Us Form
- Newsletter Sign Up Form

When you use the Sales, Letting and Valuation Services that we provide

- Details noted when you make enquiry by face to face calls, phone, email or via website
- Forms (Tenant Registration, valuation Terms of Engagement)
- Details required relating to contractual obligations
- Photography may be taken for the purpose of brochures, valuations and advertising.

When you provide us with Consent to send you regular updates

- Email Consent
- Newsletter Sign Up Form on Website
- Hardcopy Written Consent

When you visit or engage with our Social Media platforms

- Engagement (Likes/Comments/Competitions on Facebook/Twitter/LinkedIn)

Specific details we collect

- First Name, Last Name
- Contact information including email address and telephone number
- Company or Home Address and Billing address
- PPS number
- Sign up time and date
- References, wage slip, bank statements (Tenants only)
- Proof of address and copy of photo identification – to comply with Anti Money Laundering Legislation
- Newsletter subscription (only if you have opted-in)
- Banking Details (but we do not store sensitive payment data)
- Cookies (please refer to Cookie Policy section)
- Google Analytics (no personal identifiable information is passed on - all information is anonymized)

Just-Property Limited
Data Protection/ Privacy Policy
2nd July 2018



SALES • LETTING • MANAGEMENT • VALUATIONS • RENT REVIEWS • REFURBISHMENT

Website Cookie Policy

Our website use 'cookie' technology. A cookie is a little piece of text that our server places on your device when you visit any of our websites or apps. They help us make the sites work better for you.

The only function of cookies associated with our website is to track hits so as to monitor the parts of the site which are of most interest to visitors and to enable adjustments to be made to suit those requirements. No information is retained for any other purpose.

[Note: You can change the settings on your browser to refuse all cookies. However, you should note that disabling cookies may result in some parts of the site not working efficiently or in slower downloads].

For further information about cookies and how to control their use, please visit the following third party educational resources: <http://www.allaboutcookies.org> and <http://www.youronlinechoices.eu>



Sharing of Personal Data

The policy of Just-Property Ltd is not to Share your Personal Data with 3rd Parties. However – from time to time – we may be required to pass your data to 3rd parties as outlined below. Please note – this will be clarified to you at the time that the data is collected and will either be done so as to provide you with a better service – or because it is legally required to do so.

ESTATE AGENT SERVICE

Contact information of clients may need to be passed to a valuer or surveyor who requires access to the subject property to carry out an inspection on behalf of a prospective purchaser.

LETTING AGENT SERVICE

INFORMATION	WILL BE GIVEN TO		WILL BE GIVEN TO	
PPS number	Landlord	1	Residential Tenancies Board	2
Mobile Number	Landlord / Utility Provider (s) / Service Engineers / White Goods Delivery / Furniture Delivery	3	Residential Tenancies Board	4
Name	Utility Providers/ Service Engineers / White Goods Delivery / Furniture Delivery	5	Residential Tenancies Board	6
Date of Birth	Utility Provider(s)	7		
All Points 1-8 Above	Landlords (Applies only to tenants entering into a Let Only)	8		
Contact Number and/or Forwarding Address	An Garda Siochana upon special request only			

MANAGING AGENT SERVICE

We will occasionally need to pass members details to a service engineer in relation to repairs or maintenance issues.

ALL OTHER CLIENTS

- Specific Government Departments or 3rd Party Organizations may receive your data with your consent in relation to issue around the application, funding or payment of courses on your behalf.
- Revenue Commissioners may receive details for tax compliance reasons
- Our Accountants may receive details for Accounting, Audit and Regulatory purposes



Contractor & Third Party Data Protection Compliance

We expect and actively require any Third Parties with whom we work to be compliant with their legal obligations under Data Protection.

It is our policy to require all contractors or those who may come into contact with any Personal Data we hold to show GDPR compliance via self-assessment and audit through our Supplier Data Protection Checklist. We will store this checklist for the duration of our working relationship with that 3rd party (+ 12 months)

How we keep your Information Safe?

We take appropriate measures under the laws that apply, to ensure your data is safe.

IT

- Antivirus Software is used on all IT Systems
- Encryption is enabled on all systems holding Personal Data
- A Firewall assists against Network Intrusion
- Wi-Fi is secure

Document Storage

- Documents are stored in a locked Office in Individual covered Files
- Data is managed safely and not left in areas where non relevant employees can access
- Any data which might be viewed as in any way sensitive is stored in locked cabinets in a secure area.

Printing

- The printer and photocopier is located in a secure location where only staff members can access and view the information.

CCTV

- We do not record or retain CCTV footage.

Data Disposal

- Just-Property Limited engages with a GDPR Compliant Professional Shredding Company and safely/securely dispose of the Personal Data we hold to ensure compliance – see section on Data disposal

Calls relating to Personal Data

- If you contact us about your information, we may need to ask you to identify yourself and furnish proof of identity – this is to help protect your information.



How long do we keep your personal

We have policy based and regulatory obligations that mean we must keep your data while you are a client and for certain periods of time after you stop being a client. Those periods depend on the nature of the work we have done for you.

- General Data Retention Policy - we retain all general data for a period of 7 years

What is the legal basis on which we gather and hold your information?

To use your information lawfully, we rely on one or more of the following legal bases:

- Performance of a contract
- Legal obligation
- Protecting the vital interests of you or others
- Public interest
- Our legitimate interests
- Your consent

To meet our regulatory and legal obligations, we collect some of your personal information, verify it, keep it up to date through regular checks, and delete it once we no longer have to keep it. We may also gather information about you from third parties to help us meet our obligations.

If you do not provide the information we need, or help us keep it up to date, we may not be able to provide you with our services.

Disposal of Personal Data

Once the period of stated storage is complete, or based on a Request to delete personal data (presuming we have no legal or statutory obligation to retain it) – it is our policy to have your personal data securely disposed of – through bi-annual scheduled contracts with our professional shredding company.

This service will dispose of personal data such as has been collected on tenant detail forms, supply of References, proof of address, photo identification and more.

Data will be securely deleted from the following media:

- Paper Based Files
- CRM & Database Systems
- Electronic Storage – including Hard Disks & Email
- Backup Data will be deleted also in relation to these files



Consent

Sometimes we need your consent to use your personal information. With direct marketing for example, we need your consent to make you aware of services which may be of interest to you. We may do this by phone, post, email, text or through other digital media. It is our policy to keep, in as far as is possible, a documented record of this consent.

Breach Reporting

The DPO will conduct regular inspections and maintain a systematic audit schedule to monitor compliance and Just-Property Ltd will actively record and report any Breaches in relation to Data Protection. Any employee, client or 3rd party can alert the DPO to the breach, who will update the Breach Log before identifying the breach type and evaluate any risk associated with the breach.

Where there is a possibility of risk, and where the personal data breached is neither Encrypted nor Anonymized, the DPO will report the breach to the DPC, and depending on the severity/urgency of the risk – may also notify the data subject. This will be done as soon as possible – and within the required 72 hour limit.

Staff Awareness & Training

Training sessions have been completed with all staff. All future induction sessions will include a specific session on data protection.

Your Data Rights

You can exercise your rights by contacting us on **01 631 52 51**, emailing us on DPO@just-property.ie or calling into our Office – **Just-Property Ltd, 24 Thorncastle Street, Ringsend, Dublin 4.**

Whenever you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information.

Your right to obtain information cannot adversely affect the rights and freedoms of others. Therefore, we cannot provide information on other people without consent. (See Sharing of Data for further details)

We generally do not charge you when you contact us to ask about your information. However, if requests are deemed excessive or manifestly unfounded, we may charge a reasonable fee to cover the additional administrative costs or choose to refuse the requests.

The following section details your information rights and how we can help ensure that you are aware of these rights, how you can exercise these rights and how we intend to deliver on your requests.

1. You can ask us for a copy of the personal information we hold and further details about how we collect, share and use your personal information
2. If you want to update or correct any of your personal details, please contact us at on **01 631 52 51**, emailing us [on DPO@just-property.ie](mailto:DPO@just-property.ie) or calling into our Office – **Just-Property Ltd, 24 Thorncastle Street, Ringsend, Dublin 4.**



3. You can change your mind wherever you have given us your consent, such as for direct marketing or processing your information.
4. You may have the right to restrict or object to us processing your personal information. We will require your consent to further process this information once restricted. You can request restriction of processing where:
 - The personal data is inaccurate and you request restriction while we verify the accuracy
 - The processing of your personal data is unlawful
 - You oppose the erasure of the data, requesting restriction of processing instead
 - You require the data for the establishment, exercise or defense of legal claims but we no longer require the data for processing
 - You disagree with the legitimate interest legal basis and processing is restricted until the legitimate basis is verified

You may ask us to delete your personal information or we may delete your personal information under the following conditions:

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- You withdraw your consent where there is no other legal ground for the processing
- You withdraw your consent for direct marketing purposes
- You withdraw your consent for processing a child's data
- You object to automated decision making
- The personal data have been unlawfully processed
- The personal data has to be erased for compliance with a legal obligation. You declare to us that you are no longer a client of ours

Data Protection Feedback, Further Information & Complaints

If you have a complaint about the use of your personal information, please let a member of staff in our Office know, giving them the opportunity to put things right as quickly as possible.

If you wish to make a complaint you may do so in person, by phone, in writing and by email. We will fully investigate all the complaints we receive. We ask that you supply as much information as possible to help us resolve your complaint quickly.

You can also contact the Office of the Data Protection Commissioner in Ireland on the below details:

Visit their website www.dataprotection.ie

Email info@dataprotection.ie

Phone on +353 (0)57 8684800 or +353 (0)761 104 800

Write to Data Protection Office, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23. Or 21 Fitzwilliam Square, Dublin 2, D02 RD28, Ireland.

Review

This Data Protection Policy will be reviewed regularly in light of any legislative or other relevant developments. We will inform you of any changes to our Privacy Policy in the future.