



Version:	1.7
Date:	12/03/2024
Update Notes:	Review the policy in full to ensure fit for purpose.

## POD Management Privacy Notice

POD Group Services Limited t/a POD Management ('POD'), Company Number 11041782 whose registered office is Unit 1 Elstree Gate, Borehamwood WD6 1JD is the "Data Controller" in respect of the information gathered and processed by us.

POD takes great care with all data but especially personal data. We are committed to ensuring this is secure and processed in a lawful manner.

This Privacy Notice details what data we process and why we do this. For further information please contact our "Privacy Controller", who is your contact within POD whose details are at the end of this document.

POD will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. POD is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data will be held in addition to these periods depending on individual business needs.

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. The information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

## How we collect data

### Visitors to our website

When someone visits [www.podmanagement.co.uk](http://www.podmanagement.co.uk) we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

### Cookies

#### a. What are cookies and tracking technologies?

Cookies are small text files which are transferred to your computer or mobile when you visit a website or app.

#### b. Why do we use cookies and other tracking?

To do a few different things:

- to remember information about you, so you don't have to give it to us again. And again. And again
- to keep you signed in, even on different devices
- to help us understand how people are using our services, so we can make them better
- to help us by remembering your preferences and settings
- to find out if our emails have been read and if you find them useful.

#### c. What are the types of cookies?

Some cookies are always on when you visit us, and you can't turn them off unless you change your browser settings. We call these "strictly necessary cookies". We use them to make sure our digital services work correctly and are meeting audience needs and interests.

We also use functional, performance and advertising cookies to make your experience more enjoyable. You can switch these on or off at any time and you can always change your mind. We'll only use them if you've agreed.

Bear in mind there are some other cookies out there from other companies. These "third-party cookies" might track how you use different websites, including ours. For example, you might get a social media company's cookie when you see the option to share something. You can turn them off, but not through us.

#### d. How long do cookies last?

Some are erased when you close the browser on your website or app. Others stay longer, sometimes forever, and are saved onto your device so that they're there when you come back.

#### e. How do I control my cookies and tracking?

Strictly necessary cookies are always on when you visit us. On your first visit to us, we'll tell you about our other types of cookies and ask you to choose which cookies we can use. You can always change your mind by going to your settings.

Stopping all cookies might mean you can't access some services, or that some of them might not work properly for you.

Another way to control some tracking is in the settings on your device.

#### Search engine

Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected.

#### Security and performance

POD uses a third-party service to help maintain the security and performance of the website. To deliver this service it processes the IP addresses of visitors to the POD website.

#### People who call us

When you call POD we collect Calling Line Identification (CLI) information. We use this information to help improve its efficiency and effectiveness.

#### People who email us

We use Transport Layer Security (TLS) to encrypt and protect email traffic. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

#### Third Parties

We receive information from third parties in relation to providing our services. This information will be processed in accordance with GDPR.

#### Other Forms / Documentation

We may collect or receive information in other forms during the course of providing the services we provide. We will only collect information that is relevant and necessary for the purpose of providing our services.

Who we collect information about, what information we collect, what we use it for and any third party with whom the information is shared?

What we collect and process will depend on your relationship with us and may change from time to time depending on legislation and operational requirements.

Personal data held in relation to leaseholders, freehold homeowners and clients will include the following examples:

Category of data	Purpose for processing data	Legal basis for processing	Third party organisations with whom it may be shared
Contact Details	Communication in relation to providing our services	To fulfil the requirements of a contract with our clients and legitimate business interests where no direct contract with the data subject exists	Contractors, insurance companies or loss adjusters in the event of a claim, the owner of the freehold for the relevant property, parties involved in the purchase and sale of the relevant property such as banks and solicitors, emergency services if required and external agencies contracted on behalf of the client. Service review companies including (but not limited to) TrustPilot (the data subject gives consent to the sharing of information with service review companies by leaving a rating with POD – information is not shared unless a rating is given).
Financial details such as bank details and transaction records	To record transactions processed in fulfilling our services	To fulfil the requirements of a contract	BACS service provider, card processing providers, client bank account provider and external agencies contracted on behalf of the client.
Contact details, DOB and other identifying information for potential directors of client companies	To meet AML obligations and provide statutory information to Companies House.	Legal obligation to make enquiries of suitability to stand as director and provide statutory information.	Identity checking agency, Companies House

CCTV images	Crime and anti-social behaviour prevention	The legitimate business interest of providing security	Police and law enforcement authorities
Images on documents	To validate the identity of individuals	To fulfil the requirements of a contract	Police and law enforcement authorities
Health Information	To manage the property effectively and provide a duty of care to you if you tell us	To fulfil a legal obligation	Relevant authorities and statutory bodies, to comply with Fire Safety Act and DDA
Contact details and vehicle registration details	To ensure parking at buildings is maintained for the residents	The legitimate business interest of providing our service	Parking management companies

Personal data held in relation to suppliers will include the following examples (it will only be personal data for sole traders and unincorporated partnerships):

Category of data	Purpose for processing data	Legal basis for processing	Third party organisations with whom it may be shared
Contact Details	Providing services to clients	The legitimate business interest of providing effective building management services	Tenants, Clients, Lessees. Service review companies including (but not limited to) TrustPilot (the data subject gives consent to the sharing of information with service review companies by leaving a rating with POD - information is not shared unless a rating is given).
Bank Details	Payment of invoices	Legal obligation to pay for services	

Personal data held in relation to tenants who do not own the leasehold or freehold will include the following examples:

Category of data	Purpose for processing data	Legal basis for processing	Third party organisations with whom it may be shared
Contact Details	Providing services to clients and to provide a duty of care to those in managed buildings	The legitimate business interest of providing effective building management services	Contractors or suppliers of services to the relevant building or property or emergency services if required. Service review companies including (but not limited to) TrustPilot (the data subject gives consent to the sharing of information with service review companies by leaving a rating with POD – information is not shared unless a rating is given).
CCTV images	Crime and anti-social behaviour prevention	The legitimate business interest of providing security	Police
Contact details and vehicle registration for certain buildings	To ensure parking at buildings is maintained for the residents	The legitimate business interest of providing our service	Parking management companies
Health Information	To manage the property effectively and provide a duty of care to you if you tell us	To fulfil a legal obligation	Relevant authorities and statutory bodies, to comply with Fire Safety Act and DDA

Personal data held in relation to individuals who are not a customer, but who may make contact with us will include the following examples:

Category of data	Purpose for processing data	Legal basis for processing	Third party organisations with whom it may be shared
Contact Details	To provide further information of our services	The legitimate business interest of providing information relating to our services.	Relevant authorities and statutory bodies where required by law to do so.

## How we protect the information

We secure electronic and manual information in the following ways:

- Complex password security
- Role based control of access
- Locked and alarmed buildings
- Contracts with third party processors and controllers
- Following the CCTV Code of practice

## How long we keep the information

We will keep your Personal Information only as long as necessary for the purposes for which we collected it and to comply with applicable law.

Depending on our relationship with you, we may keep your Personal Information for a number of years after our relationship ends.

We will keep Personal Information for as long as is necessary for the purposes for which we collect it. The precise period will depend on the purpose for which we hold your information. In addition, there are laws and regulations that apply to us which set minimum periods for retention of Personal Information. We will provide you with further information if appropriate to give you a full picture of how we collect and use your Personal Information.

## Use of data processors

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

## Overseas Transfers

None of the information that we collect process or store as a result of this website is transferred outside of the European Economic Area (EEA). This includes information that is exchanged with any third-party organisation as described above.

## Your Rights

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review – in the event that POD refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by POD or third parties, or how your complaint has been handled, you have the right to lodge a complaint directly with the POD Privacy Controller in the first instance and also with the supervisory authority.

The details for each of these contacts are:

### Supervisory authority contact details:

A: Information Commissioner's Office Wycliffe House Water Lane Wilmslow  
Cheshire SK9  
E: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
T: 0303 123 1113

### POD Privacy Controller

A: Louise Austin, Unit 1 Elstree Gate, Borehamwood, WD6 1JD  
E: [support@podmanagement.co.uk](mailto:support@podmanagement.co.uk)  
T: 0333 5776656

## Changes to this Privacy Notice

We keep our privacy notice under regular review. This privacy notice was last updated on 12th March 2024.