

## PRIVACY POLICY

Last updated 6<sup>th</sup> June 2018 by the Data Protection Officer

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1. As part of our business, the directors and employees of TWH Homes Ltd. collect and store personal data, (data that can be used to identify people). It is collected over the phone, by e-mail, in person and occasionally through third parties such as council registers and referrals.
2. This includes names, contact details, bank statements, pay slips, copies of identification documents, National Insurance numbers and dates of birth. All of this information is collected for a purpose and used only when necessary. For example, we are required by law to collect and store evidence of an individual tenant's right to work in the UK before they can become a tenant of ours.
3. We store all personal data in line with Information Commissioner Office guidance (<https://ico.org.uk/>), and we are registered members of the ICO, as well as many other professional bodies, (logos and membership numbers shown below).
4. Our data is organised so that if anybody wishes to ask us what information we hold on them, we have a process in place to show them within one month and to delete the data on request, also within one month. This includes tenants, suppliers, employers, landlords, investors and home sellers.
5. We collect data for the following reasons:
  - i. To communicate with them about the business we are conducting together
  - ii. To validate their identity and background where required, (e.g. understanding more about the source of funds of an investor)
  - iii. To create contracts and agreements
  - iv. To solicit services
  - v. To contact people with notices or important information about the house they are living in, (e.g. about upcoming inspections)
  - vi. To collect references for any applications (e.g. tenancy applications)
  - vii. To contact referrals or publish testimonials with consent from the person giving us this information
  - viii. To conduct outreach and marketing activities
6. Our main two outreach activities:
  - i. We occasionally write to other local home owners whose details are published on publically available council databases. These home owners are registered with the council when they own a House of Multiple Occupation (HMO) that requires a mandatory licence. We write letters that introduce ourselves as fellow landlords looking to purchase property in the area and ask if they are considering selling their HMO property or any other properties that they may have. If they contact us by return, we discuss purchasing, renting or other solutions that may address any concerns or issues they may have. We typically send about 100 letters every three to six months. Each letter is personally signed by a member of our team and the envelope is hand-written to try to make it clear to the recipient that it is not a mass marketing campaign.
  - ii. We occasionally call or send messages to home owners who are advertising their properties on SpareRoom.co.uk. These messages reference the property they are advertising and ask the individual whether they would be interested in renting the whole property to us on a long-term basis, which we would then sub-let, paying them a guaranteed monthly rent. For this, we collect the phone number of the advertising party, along with their name and property information, which they have published on the site. We typically message approximately 50 landlords every three to six months.



twh homes

TWH Homes Ltd.

Registered SIC 68209. Spring Cottage, Moor End, Kelfield, York. YO19 6RJ. Tel.: 07717710634. Member of National Landlords Association, Residential Landlords Association, Information Commissioner's Office, Landlords National Property Group and Property Investors Network. Directors, Tom Holliday and Carly Holliday

[www.twhhomes.co.uk](http://www.twhhomes.co.uk)

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- iii. We may on average write to the same landlord between one and five times in total, even if they do not respond to us between attempts to contact them. Whilst these type of outreach activity do not constitute mass marketing, nor contravene any privacy laws or GDPR compliance, we understand that some recipients may wish for their details not to be used in this way. With this in mind, we would like to encourage anybody not wishing to receive these letters to contact us to have their details deleted from our database, which will be done within one month of the receipt of request.
- iv. On our web forms, individuals are able to "Opt In" actively and deliberately, to allow us to store and use their data specifically for marketing purposes. This is via a "Layered Opt-in" function, which says "Please read our Privacy Policy and tick this box to check that you have done so", followed by "I agree to having my personal information stored for use by TWH Homes in line with the Privacy Policy". Individuals must tick the boxes to continue, but neither box is ticked for them by default. They must manually tick them.
- v. We only very occasionally send mass marketing e-mails, and this is always only to people who have manually and deliberately opted in to receive them. These e-mails also always include a link to Opt Out or unsubscribe. Examples of the campaigns we run include:
  1. Referral requests
  2. Rent payment competitions that reward tenants who consistently pay their rent on time
  3. Requests of people we dealt with in the past to find out if they would like to re-engage with us for the purposes of a new or renewed engagement or transaction, (e.g. if we purchased a house from a home owner in the past, we may write to them to ask if they would like to sell us another of their properties).
7. We do not share any personal information without specific consent of the party concerned.
8. We do not sell any personal information to any third party.
9. The way we store the data is by way of secure databases, which are protected by passwords, biometrics, anti-virus and remote wipe. Personal data stored on paper is scanned and saved in this system where possible and otherwise stored in a filing cabinet, which is situated in our office and locked when unattended.
10. We do not to store data that we don't have a plan to use.
11. We have a designated Data Privacy Officer which, at the time of writing, is the co-Director of TWH Homes, Tom Holliday. It is Tom's responsibility to review our policy annually, which includes reviewing:
  - i. The processes by which we collect personal information
  - ii. How we hold, use and manage it
  - iii. How and when we delete it
  - iv. How our Opt-Out, Opt-In and Unsubscribe processes work
  - v. Who in our team needs refreshing and updating on our policy, processes and procedures so that everybody is compliant
  - vi. How our Privacy Policy needs to be updated as we continue to grow and improve

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We appreciate that things sometimes go wrong and despite our best efforts, our processes and policies may occasionally fall short of the quality levels we set for ourselves. We are therefore constantly educating ourselves and staying current with the latest legislation, and will continue to renew our various professional body registrations and memberships to ensure that this policy is constantly updated. We attract feedback from our customers, suppliers and partners, so please write to us if you spot something that could benefit from review by the Data Privacy Officer. Thank you for taking the time to read this policy.

Signed



TOM HOLLIDAY

Co-Director and Data Privacy Officer, TWH Homes Ltd.

6<sup>th</sup> June 2018

## PROFESSIONAL BODY MEMBERSHIPS

Click on the logo to be taken to the corresponding website



NLA membership number: 168538



RLA membership number: 191863/L



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ICO registration reference: A8289551



MyDeposits private landlord member number: 10702635



LNPG membership number: 5850



The Property Investors Network



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WIN-WIN PROPERTY RELATIONSHIPS

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Registered at the above in the UK No. 09527973

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