



**LOGAN  
PROPERTY**

+44 (0) 131 210 2020  
hello@logan-property.co.uk

## GDPR Fair Processing Notice (How we use your personal information)

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

### Who are we?

Logan Property Ltd, 61 Bread St, Edinburgh, EH3 9AH (“we” or “us”) take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act of 2018 and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25 May 2018, together with any domestic laws subsequently enacted.

We are registered as a data controller with the Information Commissioner's Office (ICO) under registration number **ZA832584** and we are the data controller of any personal data that you provide to us.

Our data protection officer is **John Logan**.

Any questions relating to this notice and our privacy practices should be sent to [hello@logan-property.co.uk](mailto:hello@logan-property.co.uk)

### How we collect information from you and what information we collect

We collect information about you:

- when you apply for housing with us, become a tenant, request services/repairs, enter in to a tenancy agreement with ourselves howsoever arising or otherwise provide us with your personal details;
- from your use of our online services, whether to report any tenancy related issues, make a complaint or otherwise;
- from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information).

In order to consider your application for a tenancy agreement and fulfil the landlord's duties under any subsequent contract, we require to collect the following information about you:

- name;
- address;
- telephone number;
- email address;
- employer's name and address;
- employment details, including salary information;
- previous accommodation history, including previous addresses for past 3 years and landlord details;
- proof of income, including payslips, bank statements, etc.

We also have a legitimate interest in obtaining, processing and storing the following information about you:

- National Insurance number;
- Official ID, such as passport or drivers' license;
- next of kin

We receive the following information from third parties and have a legitimate business interest in processing that information:

- benefits information, including awards of Housing Benefit/Universal Credit;
- payments made by you to us;
- complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland;
- reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour.

### **Why we need this information about you and how it will be used**

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request, housing application and complaints made;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our services or supplies which may affect you;
  
- for all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our products and services.

## Sharing of your information

The information you provide to us will be treated by us as confidential [and will be processed only by our employees within the UK/European Economic Area (EEA)] . We may disclose your information to other third parties who act for us where it is in our or the third party's legitimate interests so long as those interests are not contrary to your rights and freedoms under data protection laws. This includes the following:

- if we enter into a joint venture with or merge with another business entity, your information may be disclosed to our new business partners or owners;
- if we instruct repair or maintenance works, your information may be disclosed to any contractor;
- if we are investigating a complaint, information may be disclosed to Police Scotland, local authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- if we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and local authority);
- if we are investigating payments made or otherwise, your information may be disclosed to payment processors, local authority and the Department for Work & Pensions;
- if we are conducting a survey of our products and/or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- if we take payment from you or make payments to you we may be required to disclose your information to our client bank account provider;
- if we are asked by HMRC in regard to taxation, your information may be accordingly disclosed;

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

## Transfers outside the UK and Europe

Your information will only be stored within the UK and EEA

## Security

When you give us information we take steps to make sure that your personal information is kept secure and safe.

All client data is held on cloud based systems (pCloud). pCloud is fully compliant and certified with Quality Management and Data Management Systems as detailed below;

### **ISO 9001:2015 – Quality Management Systems (QMS)**

ISO 9001 sets out the criteria for a quality management system within an enterprise, that is based on a number of quality control principles. This certification helps ensure that customers get consistent, high quality products and services, thus increasing customer satisfaction and experience. Our quality management systems are validated by an independent third party certification authority, the aim being to provide a solid scalable framework for managing our business.

The QMS refers to key areas within an organization, including the product development processes and

the very units that create a product, such as Product Management, Project Management, Development, QA; departments that run a company, such as Company Management, HR, Health & Safety, Corporate Control and Supervision; as well as client-related units, such as Sales, Marketing, Service Delivery, Support and Maintenance. By managing these areas using a prescriptive framework like ISO 9001 we are able to manage and control the efficiency of our operation, creating a proactive repeatable set of processes that allow safe high quality services to be provided consistently and quickly.

The pCloud Quality Management System is centrally managed in Switzerland by the parent company.

### **ISO 27001:2013 - Information Security Management Systems (ISMS)**

ISO 27001:2013 is the leading and most updated information security management standard around the world. Most importantly, it takes into account the fast transforming area of information security and technology. To deal with any possible issues, related to information security and cybercrimes prevention, any software provider needs to apply high-end standardization, such as ISO 27001. The basic objective of the ISO 27001 standard is to help establish and maintain an effective information security management system that has a defined continual improvement approach to ensure it can grow and change along with the business and the technologies used.

The pCloud Information Security Management System is centrally managed in Switzerland by the parent company.

### **Data Centers**

pCloud hosts user data through a leading certified data center via collocation. When using the pCloud service, user data is transferred to our outsourced servers via TLS/SSL protocol and is copied on at least three server locations in highly secure certified data centers in Europe (Luxembourg). Our collocated service provider is certified for SSAE 16 SOC 2, Type II that ensures the highest level of security.

Our data centers are chosen following intense risk assessment processes that have proven the quality and reliability of our service provider. This includes selecting of the highest level of physical and technical security application, to ensure full data security compliance.

### **How long we will keep your information**

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

Our full retention schedule is available at 61 Bread Street, Edinburgh, EH3 9AH.

### **Your rights**

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;

- make a request to us to delete what personal data we hold about you;
- ask me to restrict or object to processing;
- data portability (in certain circumstances);
- be informed of and challenge any decisions based solely on automated processing; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at [hello@logan-property.co.uk](mailto:hello@logan-property.co.uk)  
Should you wish to complain about the use of your information, you should contact us to resolve this matter in the first instance. You also have the right to complain to the ICO in relation to our use of your information. The ICO's contact details are noted below:

The Information Commissioner's Office – Scotland  
45 Melville Street, Edinburgh, EH3 7HL  
Telephone: 0303 1231115  
email:[scotland@ico.org.uk](mailto:scotland@ico.org.uk)

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.