



IAMPROPERTY FAIR PROCESSING NOTICE

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Newcastle Office

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Call: 0345 646 0302

Email: enquiries@iamproperty.com

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iamproperty is the registered trademark of Intelligent Services Group Ltd. Registered Company in England and Wales, Company Number: 8145257. VAT Number: 319160025.

1. POLICY PURPOSE

This Policy is provided to the employees and prospective employees of the Intelligent Services Group (iamproperty) trading as iamproperty ("the company").

iamproperty is a UK Registered company, Company registration number 08145257. iamproperty's registered office is Arden House, Regent Centre, Gosforth, Newcastle upon Tyne, NE3 3LU. iamproperty consists of IAM-Sold Limited, The Conveyancing Partnership (movebutler), Medway Exchange Ltd and VTUK.

This Policy confirms who collects and processes colleague personal data to function effectively as an organisation. Personal data is processed for a variety of reasons (these are set out below), and all personal data will be collected and processed in accordance with the requirements of the General Data Protection Regulation 2018 (GDPR) and the Data Protection Act 2018.

This notice explains how iamproperty uses and shared personal data relating to prospective, current, and former employees, workers, self-employed contractors and consultants, voluntary workers, and honorary and associate staff (you/your) and your rights in relation to the processing of your personal data.

2. DEFINITIONS

PERSONAL DATA:

This is any data which can identify you directly or indirectly either by itself or when combined with other data, regardless of the format or media on which the data are stored.

SENSITIVE PERSONAL DATA:

Is any data in relation to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or a natural person's sex life and/or sexual orientation

PROCESSING:

Is any activity relating to your data including its collection, use, alteration, storage, disclosure, and destruction.

3. CHANGES TO THIS NOTICE

iamproperty may update this notice from time to time and we may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes, however where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

4. HOW WE COLLECT YOUR PERSONAL DATA

- a. Most of the personal data set out in this notice will have been provided by you during the application and the recruitment process or during the term of employment.
- b. We may also collect personal data about you from third parties including:
- c. Your CV from any recruitment agencies you authorised to approach iamproperty, IAM Sold Limited, Medway Exchange Ltd or The Conveyancing Partnership (movebutler) in relation to a position.
- d. Your references from former employers, colleagues, or other relevant parties.
- e. Information collected from formal background checks such as DBS checks.
- f. Other relevant information in the public domain.

5. TYPES OF PERSONAL DATA PROCESSED

Depending on your role, this notice sets out the types of personal data that iamproperty may collect and process about you, including "sensitive personal data" and require us to take additional steps to ensure their security and confidentiality.

6. PERSONAL DATA PROVIDED BY YOU ABOUT OTHERS

You may provide us with personal data about other individuals, for example, next of kin/emergency contact details and information about your family circumstances and dependents. You should notify the relevant person that you are providing their contact details to iamproperty as your listed next of kin/emergency contact.

7. HOW IAMPROPERTY USES PERSONAL DATA ABOUT YOU

Depending on your role, iamproperty may process personal data (including special categories of personal data) about you for the following purposes:

- a. The administration of prospective, current, and past employees including self-employed, contract personnel, temporary staff or voluntary workers, and work overseas
- b. The recruitment and selection process
- c. The administration of payroll services
- d. Planning and management of iamproperty workload or business activity
- e. Administration of agents or other intermediaries
- f. Pensions administration
- g. Disciplinary matters, staff disputes, employment tribunals
- h. Colleague training and development
- i. Ensuring staff are appropriately supported in their roles
- j. Background Checks (where applicable).
- k. Assessing iamproperty performance against equality objectives as set out by the Equality Act 2010

8. LAWFUL GROUNDS FOR PROCESSING YOUR PERSONAL DATA

We will only use your personal data when we are permitted to do so by law. Most commonly, we will use your personal data:

- a. To perform a contract that one of the iamproperty Group of legal entities has entered with you (for example, your employment contract or contract for services)
- b. To comply with iamproperty's legal obligations (for example, complying with employment and tax, immigration, health, and safety and safeguarding laws, preventing, and detecting crime, assisting the police and other authorities with their investigations)
- c. Where necessary for our legitimate interests or those of a third party provided your interests and rights do not override those interests (for example, evaluating the suitability of a candidate for a role or defending employment claims brought by you)
- d. To protect your vital interests or those of another person (for example, where we know or have reason to believe that you or another person may suffer harm)

In circumstances where you have a genuine choice as to whether we should process your personal data, we will ask you for your consent. The method used to obtain your consent will depend on the scope and context of the processing that we propose.

In relation to special categories of personal data and personal data relating to criminal convictions and offences, we may request your explicit consent unless a condition applies which allows us to process such personal data without doing so.

9. SHARING YOUR PERSONAL DATA WITH THIRD PARTIES

9.1. Where iamproperty has lawful grounds for doing so, we may share your personal data with the following third parties.

- a. HM Revenue and Customs (HMRC) and overseas tax authorities
- b. Where staff are also employed by, contracted to, or perform duties for the NHS, relevant information will be shared with the NHS as required

- c. Pension schemes.
- d. Potential employers (where a reference is requested)
- e. Department for Work and Pensions (DWP) as required by the Social Security Administration Act 1992
- f. Child Maintenance Service as required by the Child Support Information Regulations 2008
- g. Official auditors
- h. Insurance providers

Please note that the list above is not necessarily exhaustive.

Parents, family members and guardians are third parties, and your personal data will not be disclosed to such persons unless you have given your consent, or the disclosure is otherwise made in accordance with data protection law.

9.2. Where iamproperty uses third parties to process personal data on its behalf (acting as data processors), a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to your personal data.

Current Third Party Processors (these are subject to change) of employee data are as follows:

- a. Royal London (Pension)
- b. Tait Walker/Azets (Payroll Functions)
- c. Zellis UK Limited (Background Checks)
- d. Credas Technologies (Right to Work Checks)
- e. MetLife Insurance (Employee Death in Service Benefits)
- f. BUPA (Health Care and Cash Plans)
- g. PeopleHR (HR Management Tool)
- h. AON (Employee Benefits)

10. WHERE YOUR PERSONAL DATA IS STORED

Most personal data about you, including your personnel file, will be stored on servers within the UK.

11. HOW IAMPROPERTY KEEPS YOUR PERSONAL DATA SECURE

iamproperty has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used, or accessed in any unauthorised way or altered or disclosed. In addition, iamproperty limits access to your personal data to the persons and organisations, including those described above, who have a lawful and legitimate need to access it.

iamproperty has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so

12. HOW LONG WITH IAMPROPERTY RETAIN YOUR PERSONAL DATA

iamproperty must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, iamproperty has considered:

- a. The nature, sensitivity, and volume of the personal data
- b. The potential risk of harm to you arising from iamproperty continued retention of the personal data
- c. The purposes for which iamproperty may process your personal data
- d. Whether iamproperty is required to retain any personal data by law or in accordance with its legitimate interests

In most cases, correspondence in relation to your employment or engagement will be held by our Human

Resources and retained for six years after you have left employment, at which time it will be securely disposed of. Basic information about your employment or engagement (appointment, dates of service etc) will be retained indefinitely.

In some cases, iamproperty may anonymise your personal data so that it can no longer be identified with you, in which case iamproperty may retain such data indefinitely.

13. CONTACT DIRECTORY

Employees' (and sometimes independent consultants and contractors') will publicly appear on our website. This will include name, job title and may include an image. This promotes a professional and friendly image for our clients of who they are dealing with.

Where there is good reason, colleagues may apply to iamproperty to have their information removed from public view. This may be a temporary or permanent change depending on the circumstances. If you wish to make such an application, please email hr@iamproperty.co.uk

iamproperty will not release colleague email addresses into the public domain to prevent a rise in spam emails received by colleagues.

14. YOUR RESPONSIBILITIES

You must ensure that any personal data collected and processed by you while performing your duties and obligations is processed and protected in line with our Data Protection Policy and our Information Security Policy.

Members of staff can notify iamproperty of any changes to their contact details through PeopleHR. It is important that iamproperty have accurate records for colleagues in case there is a need to contact staff in emergency circumstances.

15. YOUR RIGHTS

You have rights in relation to the processing of your personal data by iamproperty:

RIGHT TO ACCESS

You have the right to request and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data.

RIGHT TO CORRECTION

You have the right to request correction of any inaccurate or incomplete personal data held about you.

DELETION

You have the right to request erasure of any personal data held about you where there is no good reason for iamproperty to continue processing it or where you have exercised your right to object to the processing of your personal data.

RESTRICTION

You have the right to request restriction of how iamproperty processes your personal data; for example, to confirm its accuracy or iamproperty reasons for holding it or as an alternative to its erasure.

OBJECTION

You have the right to object to iamproperty processing any personal data which is based on the legitimate interests of iamproperty or those of a third party based on your circumstances. You also have the right to object to iamproperty processing your personal data for direct marketing purposes.

PORTABILITY

You have the right to receive or request that iamproperty transfers a copy of your personal data in an electronic format where the basis of iamproperty processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.

COMPLAINTS

You have the right to complain to the Information Commissioner's Office (ICO) or any other EU supervisory authority in relation to how iamproperty processes your personal data.

Should you wish to exercise rights in relation to your personal information please contact hr@iamproperty.com detailing your request. To protect the confidentiality of your personal data iamproperty may ask you to verify your identity before fulfilling any request in relation to your personal data.

16. DATA SUBJECT ACCESS REQUESTS (DSARS)

Under the Data Protection Act 2018, you have the right to ask for a copy of the personal information that a business holds about you. This will include copies of communications with you such as emails, transcribes of calls, letters, and transactional notes. DSARs are actioned within 1 calendar month.

- a. If you are requesting information on behalf of the data subject, iamproperty will require their signed written consent, along with 2 x certified identification documents prior to the request being actioned.
- b. If you have been legally appointed to act for the data subject, we will require a copy of the documentation instructing you to act along with their signed, written consent prior to the request being actioned.

17. WHERE A REQUEST CANNOT BE COMPLIED WITH

iamproperty may refuse requests in certain circumstances. For instance, where the request is deemed manifestly unfounded or excessive, where the laws prevent them from doing so, or where it could result in the sharing of another data subject's personal information.

Where this is the case, you will be notified, and an explanation provided. This does not remove your right to complain to the ICO if you are unhappy with the response provided.

Where the lawful ground relied upon by iamproperty to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. However, if you do so, iamproperty may not be able to provide some or all services to you or the provision of those services may be affected. iamproperty is a 'controller' in relation to your personal data and is registered as such with the Information Commissioner's Office (ICO). ICO registration number is ZA248040.

QUESTIONS OR COMMENTS

If you have any questions or concerns, or you wish to exercise any of these rights you must contact the HR Department via email on hr@iamproperty.com or via post at **HR Department, 6 Floor Arden House, Regent Centre, Gosforth, Newcastle upon Tyne, NE3 3LU**.

18. IMPLEMENTATION AND POLICY OWNERS

Date Implemented	25th May 2018
Policy Owners	Nicola Sharp – Chief People Officer Emma Burdis – Head of Compliance
Last Updated	July 2023

Newcastle Office

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