NRML Policy No 001 – General Data Protection Page 1 of 2

Approval date: 30/11/18 Review date; 30/11/20 Approved by The Board

Summary of Policy	To manage Data Protection Regulations relating to all NRML Members and residents in Admiral House Newport Road
Scope	Applicable to all NRML Members/Lease holders/Residents
To be read in conjunction with;	The head lease, lease and General Data Protection Regulations
Lead & Owning Group	NRML Board
Implementation date	31st November 2018

Version 1.0 Date 30/11/18 Summary of changes; Implementing latest GDPR Regulations

The Policy

Newport Road Maintenance Ltd is a company of members with no shares issued. The Company collects uses and is responsible for certain personal information relating to Members and Tenants for those Members that underlet apartments in Admiral House. When we do so we are regulated under the General Data Protection Regulations (GDPR) and we are responsible as "controller" of that personal information. We will comply with these principles when gathering and using personal information as set out in this Policy.

In this Policy references to "we", "our" or "us" means the Company.

Personal Information we collect and use; Provided from you to us and from under letting tenants.

Name or Company name (if applicable), address, landline and or mobile telephone numbers, alternative contact details, fax number, email address, date of birth, nationality, occupation, bank details credit/debit card information, mortgage and car registration. The company will assume that consent has been obtained for the company to hold and process personal information when it has been given personal information of another person.

The provision of personal data (as above is required to enable us to perform our duties as the managing company (NRML).

Personal Information we collect and use; Information collected from other sources.

We may from time to time obtain personal information from other sources as follows:

Name or company name (if applicable), address, landline and or mobile telephone numbers, alternative contact details, fax number, email address, mortgage detail, car registration, from solicitors, mortgage lenders, Notice of Transfer, Land registry DVSA, local authorities, property developers, manging agents, letting agents and ground landlords.

How we use Personal information.

We will typically collect and use this information for the following purposes:

- For performing our duties as the management Company (NRML) at Admiral House Newport Road.
- To comply with underletting conditions detailed in our leases
- To share this information to facilitate the appointment of managing agents from time to time.
- To notify you about changes to our service and or all obligations including those under Regulations.
- To provide you with information, products and services requested from us.
- For the purposes of our legitimate interests or of those of a third party, but only if these are not overridden by your interests, rights and freedoms.

We seek to ensure that our information collection and processing is always proportionate.

Who we share your personal information with.

The company commits to keeping your personal information confidential and safe , however in carrying out or duties we may be required to share some if not all the personal information we hold from whatever source. We may share information with the following organisations in carrying out our duties, however its use will be limited to fulfilling legal duties and obligations:

- Company employees, contractors and agents including caretakers and concierge
- Insurance – Insurance providers, broker and loss adjusters
- Ground landlords
- Managing Agents appointed by the company
- Directors of the management company
- Accountants / Auditors
- Legal Professionals – solicitors barristers, debt collectors, Land Valuation Tribunal/First Tier Tribunal, Rent Tribunal (if required)
- Information technology – IT consultancy, software providers, website consultancy, website hosting (UK) email cloud hosting (UK) and CCTV monitoring
- ARMA/RICS/Ombudsman
- Local Authorities
- Letting Agents
- DVSA
- All Emergency services (if required)