



PRIVACY POLICY
JONES ASSOCIATES (NORTH WEST)
LIMITED, JONES ASSOCIATES
RETIREMENT COMPANY LIMITED
AND JONES ASSOCIATES BLOCK
MANAGEMENT LIMITED
V1.4 30/07/2021

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1. How we use your personal information

Information that is about you, or from which you can be identified will be held by Jones Associates (North West) Limited, Jones Associates Retirement Company Limited and Jones Associates Block Management Limited. This information includes what you tell us about yourself, what we learn about you by you being a customer and the choices you tell us about what marketing you want us to send to you. This Notice also tells you about your privacy rights and how the law protects you.

2. Personal Information and the Law

You can contact us about anything in this Privacy Notice. If you have any queries or want more details about how we use your personal information, you can ask us by:-

- Emailing: dataprotection@jonesassociates.uk.com;
- Writing to:- Data Protection Officer, Jones Associates, Georges Court, Chestergate, Macclesfield. Cheshire, SK11 6DP
- Telephoning: 01625 500 774 (between 9am - 5.30pm Mon to Fri)

3. How the law protects you

This section tells you the legal reasons we rely on for each of the ways your personal information is used. Your privacy is protected by law and this section also tells you how that works.

Data Protection law says that we're allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside of Jones Associates (North West) Limited, Jones Associates Retirement Company Limited and Jones Associates Block Management Limited. The law says that we must have one or more of these reasons:

- ☐ To fulfil a contract we have with you, or
- When it's our legal duty, or
- When it's in our legitimate interest, or
- ☐ When you consent to it.

When we have a business reason of our own to use your information, this is called a '**legitimate interest**'. We will tell you what that is if we are going to rely on it as the reason for using your data. Even then, we must not use it unfairly or against your interest.

The law and other regulations treat some types of sensitive personal information as 'Special'. This includes information about racial or ethnic origin, sexual orientation, religious beliefs, trade union membership, health data and criminal records. We will not collect or use these types of data without your explicit consent unless the law allows us to do so. If we do, it will only be when it's necessary.

4. How we use your personal information

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

Serving you as a customer		
What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none">• To manage our relationship with you;• To deliver our products and services;• To study how our customers use products and services from us and other organisations; and• To communicate with you about our products and services	<ul style="list-style-type: none">• Your consent;• Fulfilling contracts;• Our legitimate interests; or• Our legal duty.	<ul style="list-style-type: none">• Keeping our records up to date, working out which of our products and services may be required by you and telling you about them;• Developing products and services ; and• Being efficient about how we fulfil our legal and contractual duties.

Managing our operations		
What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none">• To deliver our products and services;• To make and manage customer payments;• To manage fees, charges and interest due on customer accounts;• To collect and recover money that is owed to us; and• To manage your property in accordance with your Lease	<ul style="list-style-type: none">• Fulfilling contracts;• Our legitimate interests; or• Our legal duty.	<ul style="list-style-type: none">• Being efficient about how we fulfil our legal and contractual duties; and• Complying with rules and guidance from regulators.

Managing Security, Risk & Crime Prevention		
What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none">• To manage risk for us and our customers;• To obey laws and regulations that apply to us; and• To respond to complaints and seek to resolve them	<ul style="list-style-type: none">• Fulfilling contracts;• Our legitimate interests; or• Our legal duty.	<ul style="list-style-type: none">• Developing & improving how we deal with our legal duties in this respect;• Complying with rules and guidance from regulators; and• Being efficient about how we fulfil our legal and contractual duties.

Business Management		
What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, adding and testing systems and processes, managing communications, corporate governance, and audit. 	<ul style="list-style-type: none"> Our legitimate interests; or Our legal duty. 	<ul style="list-style-type: none"> Complying with rules and guidance from regulators; and Being efficient about how we fulfil our legal and contractual duties.

Business Improvement		
What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> To test new products To manage how we work with other companies that provide services to us and our customers; To develop new ways to meet our customers' needs and to grow our business; and To exercise our rights set out in agreements or 	<ul style="list-style-type: none"> Fulfilling contracts; Our legitimate interests; Our legal duty; or Fulfilling contracts. 	<ul style="list-style-type: none"> Developing products and services, and what we charge for them; Defining types of customers for new products or services; and Being efficient about how we fulfil our legal and contractual duties.

For processing Special Categories of personal data	
What we use your personal information for	Our reasons
<ul style="list-style-type: none"> Responding to regulatory requirements 	<ul style="list-style-type: none"> Showing whether we have assessed your situation in the right way; and Passing information to the regulator as needed to allow investigation into whether we have acted in the right way.
<ul style="list-style-type: none"> Legal claims 	<ul style="list-style-type: none"> Using any special categories of data as needed to establish, exercise, support or defend legal claims
<ul style="list-style-type: none"> Consent 	<ul style="list-style-type: none"> Telling you that we need your consent to process special categories of personal data, when that is what we rely on for doing so.

Types of Personal Information

This explains what the different types of personal information that are covered by Data Protection Law mean.

Type of personal information	Description
Financial	Your financial position, status and history
Contact	Your name, where you live and how to contact you
Socio-Demographic	This includes details about your work or profession and nationality
Transactional	Details about payments to and from your accounts with us
Contractual	Details about the products or services we provide to you.
Behavioural	Details about how you use products and services from us.
Communications	What we learn about you from letters and emails you write to us and conversations between us.
Open Data & Public Records	Details about you that are in the public records, such as the Electoral Register, and information about you that is openly available on the internet.
Usage Data	Other data about how you use our products and services.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, driving license, birth certificate or utility bill.
Special Types of Data	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do:</p> <ul style="list-style-type: none">• Racial or ethnic origin;• Religious, political or philosophical beliefs;• Genetic and biometric data;• Health data;• Lifestyle information including data related to sexual orientation;• Criminal records of convictions and offences; and <p>You can read how we may use special types of data in “How the law protects you”.</p>
Consents	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you.
National Identifier	A number or code given to you by a government to identify who you are, this could be a National Insurance number or Social Security number or Tax Identification Number (TIN).

5. Where we collect personal information from

This section lists all the places where we get data that counts as part of your personal information. We may collect personal information from any of these sources:

Information provided by you:

- ☐ When you apply for our products and services;
- ☐ When you talk to us on the phone, your property or in our office, including notes we make;
- ☐ When you use our website;
- ☐ By emails and letters;

- ❑ In Property Owners Questionnaires or other documents;
- ❑ In customer surveys

Data we collect when you use our services:

This covers details about how you use our services, and account activity.

1. Payment & transaction data

This includes the amount, frequency, type, location and origin.

2. Profile & usage data

This includes your settings and marketing choices. We may also use cookies to collect data while you're using our website, however this information will **not** be used to identify you. You can find out more about this in our [Cookie Policy](#).

Data we collect from outside sources:

- ❑ Information provided by your Freeholder/Landlord or Management Company in relation to your property;
- ❑ Any Agent/Contact acting on your behalf or providing us with information relating to you
- ❑ Landlords;
- ❑ Insurers;
- ❑ Public Directories such as the Electoral Register & CompaniesHouse;
- ❑ Government & Law Enforcement agencies;
- ❑ Solicitors/Lawyers or other Legal Professionals; and
- ❑ Debt recovery and/or tracing agents.

6. How long we keep your personal information

This section explains how long we may keep your information for and why.

We will keep your personal information for as long as you're a customer of Jones Associates (North West) Limited, Jones Associates Retirement Company Limited and Jones Associates Block Management Limited . We may keep your data for up to 6 years after you stop being a customer. The reasons we will do this are:-

- ❑ To respond to a question or complaint, or to show whether we gave you fair treatment; and
- ❑ To obey rules that apply to us about keeping records.

We may also keep your data for longer than 6 years if we cannot delete it for legal, regulatory or technical reasons. An example being we have to hold some personal information for longer to resolve or defend on going claims.

We will only use your personal information for those purposes and will make sure that your privacy is protected. You can get more information about how long we keep data by contacting our Data Protection Officer.

7. If you choose not to give personal information

You can choose not to give us personal information. In this section we explain the effects this may have.

We may need to collect personal information by law, or to enter into or fulfil a contract we have with you. If you choose not to give us this personal information, it may delay or prevent us from fulfilling our contract with you, or doing what we must do by law. It may also mean that we cannot run your accounts with us. It could mean that we have

to cancel a product or service you have with us. We sometimes ask for information

that's useful but not required by law or a contract. We will make this clear when we ask for it. You do not have to give us these extra details and it won't affect the products or services you have with us.

8. Cookies

Cookies are small computer files that get sent to your PC, tablet or mobile phone by websites when you visit them. When you revisit these sites the cookie identifies you as a previous visitor. Cookies store information about your visits to that website, such as your choices and other details. Some of this data does not contain personal details about you, but is still protected by this Privacy Notice. We **do not** use cookies to gather personal information and any such data will not affect your accounts with us.

9. How to Complain

This section gives details of how to contact us to make a complaint about data privacy. It also shows you where you can get in touch with the government regulator.

Please let us know if you are unhappy with how we have used your personal information. See **Contacting Us** for how you can do this.

You also have the right to complain to the regulator, and to lodge an appeal if you're not happy with the outcome of a complaint. This is the **Information Commissioners Office**. Find out on their website www.ico.org.uk how to report a concern.

10. How to withdraw your consent

This section explains what to do if you no longer want us to hold your personal information.

You can withdraw your consent at any time. Please contact us by emailing dataprotection@jonesassociates.uk.com if you want to do so, or by other methods as outlined in the Contacting Us section. This will only affect the way we use information when our reason for doing so is that we have your consent and will not affect data being processed under any other basis. See the section 'Your Rights' about more generally restricting the use of your information. If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

11. Letting us know if your personal information is correct

If you think the information we hold for you is wrong, incomplete or out of date you have the right to question the information we have about you that you think is incorrect. We'll take reasonable steps to check this for you and correct it.

If you want to do this, please contact our Data Protection Officer. See **Contacting Us** for advice on how you can do this.

12. How to get a copy of your personal information

This section tells you where to write to us to get a copy of your personal information, and how to ask for digital file you can use yourself or share easily with others. This is called a Subject Access Request.

You can do this by writing to our Data Protection Officer at this address:

Data Protection Officer, Jones Associates, Georges Court, Chestergate, Macclesfield, Cheshire, SK11 6DP or by email dataprotection@jonesassociates.uk.com

When you want to share your data with outside companies

You also have the right to get certain personal information from us as a digital file, so that you can keep and use it yourself, and give it to other organisations if you choose to. We will provide it to you in an electronic format that can be easily reused, or you can ask us to pass it on to other organisations for you. If you want us to do this, please write to the Data Protection Officer. See [Contacting Us](#) for how you can do this.

13. Your rights

This section explains about your right to object and other data privacy rights you have and how to contact us about them.

You can object to us keeping or using your personal information. This is known as the '**right to object**'. You can also ask us to delete, remove or stop using your personal information if there is no need for us to keep it. This is known as the '**right to erasure**' or the '**right to be forgotten**'.

There may be legal or other official reasons why we need to keep or use your data, Please tell us if you think that we shouldn't be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. You can ask us to restrict the use of your personal information if:

- ☐ Its not accurate;
- Its been used unlawfully but you don't want us to delete it;
- ☐ Its not relevant any more, but you want us to keep it for use to provide a service at a later date (such as to provide a reference for a future tenancy); and
- You have already asked us to stop using your data but you're waiting for us to tell you if we are allowed to keep on using it.

If we do restrict your information in this way, we won't use or share it in other ways while its restricted. If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please write to the Data Protection Officer. See [Contacting Us](#) for how you can do this.

14. Who we share your personal information with

We may share your personal information with outside organisations such as law enforcement and government agencies, appointed Managing Agents and your Freeholder/Landlord. This is so we can provide you with products and services, run our business, and obey rules that apply to us. The types of organisations that we may share your personal information with are listed below.

Official bodies that include:

- Central and Local government
- Law enforcement

Service Providers

- Outside companies that provide services to the development properties.
- Agents, suppliers, sub-contractors and property advisors. These are types of firms that we use to help us run accounts, policies and services.
- Agents who help us to manage the Development and collect what is owed to us.
- Electricity, Water and Gas suppliers.
- Someone linked with you or your product or service. This could mean a joint tenant, guarantor, trustee, or authorised contact.
- Companies you ask us to share your information with.

Other Services and Schemes

These are organisations that we may need to share your personal information with, because of what you can do with the product or service you have with us.

- If you use Standing Orders, we will share your data with the relevant Bank.

15. How we work out what marketing you receive

We may use marketing to let you know about products, services and offers that you may want from us. This section tells you how we decide what marketing to show or send you. It also explains how we work out what you may be interested in.

We may use your personal information to make decisions about what products, services and offers we think you may be interested in. This is what we mean when we talk about 'marketing'.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not conflict unfairly with your own interests.

The personal information we have for you is made up of what you tell us, data we collect when you use our services, or from outside organisations we work with. We may use your data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, and offers may be relevant for you.

This is called profiling for marketing purposes. You can contact us at any time and ask us to stop using your personal information this way.

If you allow it, we may show or send you marketing by email or by post.

What information you get will depend on marketing choices that you set. You can change these at any time and tell us to stop sending you marketing.

Whatever you choose you will still receive other important information such as changes to your existing products and services.

We do not sell the information we have about you to other organisations.

We may ask you to confirm or update your choices, if you take new products or services with us in the future. We will also ask you to do this if there are changes in the law, regulation or the structure of our business.

If you change your mind you can contact us to update your choices at any time. See [Contacting Us](#).

16. How we use your information to make automated decisions

In this section we tell you how we may use automated systems to help us make decisions about you and your application.

We may use automated systems sometimes to make decisions about you, but we may use some systems to help us make decisions. This helps up to make sure our decisions are fair, efficient, and correct based on what we know.

This does not affect the products, services or features we may offer you now or in the future, or the price you're charged for them.

Opening Accounts

When Jones Associates (North West) Limited, Jones Associates Retirement Company Limited and Jones Associates Block Management Limited are instructed as your Managing Agents, an account is setup on our system for your property. As your contract is with your Freeholder, Jones Associates (North West) Limited, Jones Associates Retirement Company Limited and Jones Associates Block Management Limited have no requirement to make any form of automated decision. If we do so, you have rights over these.

- You can ask that we don't make decisions based on automated systems only.
- You can object to an automated decision, and ask that a person reviews it.

If you want to know more about these rights please contact us. See [Contacting Us](#) for how you can do this

17. Credit Reference Agencies (CRAs)

This section explains how we work with outside companies, what we do and why we do it.

Jones Associates (North West) Limited, Jones Associates Retirement Company Limited and Jones Associates Block Management Limited have no requirement to use Credit Reference Agencies, however should we be required to pass your account to our legal partners to collect money that is due, this may have an effect on your Credit Rating. You would need to contact the following Agencies to request a copy of your report.

Here are the details of the three main Credit Reference Agencies:

Credit Reference Agency	Contact Details
CallCredit PLC	1, Park Lane Leeds LS13 1EP Telephone:0330 024 7574 Email: consumer@callcreditgroup.com

Experian

Consumer Helpdesk Service Centre
PO Box 8000
Nottingham
NG80 7WF
Telephone: 0344 481 0800 / 0800 013 8888
Email: consumer.helpservcie@uk.experian.com

Equifax

Customer Service Centre
POI Box 10036
Leicester
LE3 4FS
0333 321 4043 / 0800 014 2955
Email: www.equifax.co.uk/ask

18. Fraud Prevention Agencies

We may need to confirm your identity before we provide products or services to you. This may include carrying out fraud checks at the point of application.

When we have a business or commercial reason of our own to use your information, this is called a 'legitimate interest'. We will tell you what that is, if we are going to rely on it as the reason for using your data. Even then, it must not unfairly go against your interests.

We will use the information to:

- ☐ Confirm identities;
- ☐ Help prevent fraud and money laundering; and
- ☐ Fulfil any contracts you have with us.

We may allow law enforcement agencies to access your personal information. This is to support their duty to prevent, detect, investigate and prosecute crime.

These organisations can keep personal information for different lengths of time, up to six years.

The information we use

These are some of the kinds of personal information that we use:

- ☐ Name;
- ☐ Residential address;
- ☐ History of where you have lived;
- ☐ Contact details, such as email addresses and phone numbers;
- ☐ Employment details

Data transfers out of the EEA

Whilst we are based in the UK, we may need to send personal information to countries outside the European Economic Area ('EEA') for example when the Landlord/Freeholder of the Development resides abroad. When we do, there will be a contract in place to make sure the recipient protects the data to the same standard as the EEA.

19. Sending data outside the EEA

This section tells you about the safeguards that keep your personal information safe and private, if it is sent outside the European Economic Area ('EEA').

We will only send your data outside of the EEA to:

- ☐ Follow your instructions;
- ☐ Comply with a legal duty; and to
- ☐ Work with our Landlords to allow us to run your accounts and services.

We are based in the UK, if we do transfer your personal information outside the EEA, we will make sure that it's protected to the same extent as in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA;
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA

20. Contacting us

This section tells you how you can contact us.

Email: dataprotection@jonesassociates.uk.com

Telephone: 01625 500 774

By post or in person: 116 Chestergate, Macclesfield, Cheshire, SK11 6DU