



Privacy Policy (External)

At SEAL Properties, we are committed to protecting and respecting your privacy. This policy explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others, and how we keep it secure.

This privacy policy applies to clients, tenants, landlords, and other individuals we interact with in the course of our business.

1. Who We Are

SEAL Partnership Ltd T/A SEAL Properties

Address: 167 Saltwell Road, Gateshead, NE8 4TJ

Phone: 0191 5805900

Email: info@sealproperties.co.uk

Data Protection Officer (DPO): Emma Bovingdon

ICO Registration: ZA121702

2. What Data We Collect

We may collect and process the following types of personal data:

- **Personal Identification Information:** Name, date of birth, address, email address, phone numbers.
- **Financial Information:** Bank details, credit history, salary information.
- **Identity Documents:** Passport, driving licence, national insurance number.
- **Rental History:** Previous addresses, landlord references.
- **Employment Information:** Employer details, job title, income verification.
- **Tenancy Information:** Rent payment details, tenancy agreements, property inspections.
- **Communications:** Emails, phone calls, text messages, and correspondence.



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- **Website Information and IT data:** Cookies, IP address, usage data from our website, logins, usernames and encrypted passwords.
- **Contract Details:** Details of contracts between you and us or between other parties (such as between a tenant and a landlord).
- **Profile Data:** Information about you inputted onto our website; for example what type of property you are seeking, including your budget and area, your interests and preferences.

3. Special Categories of Personal Data

We collect certain special categories of personal data about you, including your biometric data such as your photograph(s) and fingerprints.

The aforementioned data is collected via biometric residence permit cards as part of the 'right to rent' checks.

Lawful bases for processing special categories of data

Under the Data Protection Legislation, we can only use special category personal data if we have a proper reason for doing so, for example: explicit consent, vital interests, employment, substantial public interest, etc.

We rely on **substantial public interest** and **legal obligation** to process the special categories of data set out above for the specific purpose of ID verification in compliance with 'right to rent' checks as required under the Immigration Act 2014.

Children's data

We do not provide goods/services directly to children or proactively collect their personal data. However, we may collect basic identifier information of children from parents or guardians, such as names and dates of birth, for purposes of confirming occupancy of properties. If you believe that we have incorrectly received information relating to or from persons under the age of 18 please contact us at info@sealproperties.co.uk.

4. How We Collect Data

We collect personal data in the following ways:

- When you fill out forms or submit enquiries on our website, via our portal or in person.
- When you interact with us via social media; for example, our Facebook page.
- Through email, phone, or face-to-face communications.
- From third-party sources, including credit reference agencies and former landlords.
- From publicly accessible sources; for example, via other public websites.
- Automatically, when you visit our website (through cookies and similar technologies).



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5. Why We Collect and Use Your Data

We process your personal data to:

- **Manage Tenancy Agreements:** To prepare tenancy agreements and manage the tenancy.
- **Tenant Vetting:** To carry out reference checks and ensure tenants meet our standards.
- **Property Management:** To manage repairs, maintenance, and property inspections.
- **Legal Compliance:** To comply with legal obligations such as the 'right to rent' checks and anti-money laundering regulations.
- **Marketing:** To provide you with information about our services (with your consent).
- **Security and Fraud Prevention:** To protect against fraud and ensure security.

6. Legal Basis for Processing

We process your data based on the following lawful grounds:

- **Contractual Necessity:** Processing is necessary to perform a contract with you (e.g. to provide services and manage the relationship with you in relation to your tenancy agreements).
- **Legitimate Interests:** Processing is necessary for our legitimate interests, such as:
 - managing the property;
 - managing payments;
 - improve our services;
 - marking and customer relationships;
 - to ask you to leave a review or complete a survey;
 - for the prevention and detection of fraud or spam;
 - for the establishment, exercise or defence of our rights under our contract with you and/or legal claims;
 - to send you updates or other marketing communication if you are our existing client.
- **Legal Obligation:** We are required to process certain data to comply with legal obligations (e.g. to notify you about changes to your terms or privacy notice, to address a complaint, to comply with a request from a competent authority, to comply with the 'right to rent' checks).



- **Consent:** Where we rely on your consent to process your data (e.g. for marketing), you have the right to withdraw your consent at any time.

7. Marketing

Our marketing emails

We may send you emails about our products if you are our existing customer (on the basis of our legitimate interests) or, if you are our prospective customer, when you expressly agree to that (for example, by signing up to our newsletter).

Cookies and similar technologies

We may also use cookies and similar tracking technologies (for example tracking pixels in our marketing emails and website/app advertisements) to collect information about your use of our website, app, services and your interactions with our marketing emails and advertisements.

We will ask for your consent to the use of non-essential cookies, including third party cookies. You can find further information about the cookies used on our website and the purposes for which they are used by reading our Cookies Notice [\[insert as a link\]](#).

Right to withdraw consent or to object to processing

You can always ask us to stop using your personal information for marketing purposes by:

- emailing us at info@sealproperties.co.uk;
- changing your marketing preferences within your account on our website or app;
- in the case of marketing emails, by using the 'unsubscribe' link in our marketing emails; or
- in the case of cookies, by using the cookie preferences settings on our website.

From time to time, we may ask you to confirm or update your marketing preferences.

8. Who We Share Your Data with

We may share your data with:

- **Landlords:** For purposes of managing tenancies.
- **Tenants:** For purposes of managing tenancies.
- **Service Providers:** Contractors, maintenance workers, and other third parties involved in the property management, such as:
 - Inventorybase (<https://inventorybase.co.uk/privacy/>);
 - Deposit Protection Service (<https://www.depositprotection.com/privacy-policy>);



- Tenant Deposit Scheme (<https://www.tenancydepositscheme.com/privacy-policy/>);
- Other estate agencies (for example, other letting agents when appointed to assist a landlord in finding a tenant); or
- Local councils and charity partners.
- **Accounting Platforms:** such as PayProp used for management of payments. PayProp stores personal data in the European Economic Area. For more information on how PayProp processes your personal data, see their privacy notice at <https://www.payprop.com/uk/privacy>.
- **Credit Reference Agencies:** For example, Blinc (see Blinc's privacy notice: <https://www.blincref.com/legal/privacy-policy>) and Vouch (see Vouch's privacy notice: <https://vouch.co.uk/privacy-policy>), for credit checks and affordability assessments.

We impose contractual obligations on the above third party providers to ensure that your personal data is protected.

Other sharing:

We may share your data with:

- **Members of our Staff.**
- **Professional Advisers:** For example, lawyers, accountants, auditors or insurers who provide professional services to us or a landlord.
- **Other Third Parties:** If specifically requested or agreed with you (e.g. if you ask us to introduce you to a third party), or we may need to share some personal data to parties, such as potential buyers of some or all of our business, potential investors, or group companies if our business undergoes a corporate re-structure.
- **Government and Regulatory Bodies:** Where required by law (e.g. HMRC, immigration authorities).
- **Law Enforcement:** If necessary to prevent crime or comply with a legal obligation (for example, the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017).

Such data recipients will be bound by confidentiality obligations.

9. How Long We Keep Your Data

We will retain your personal data for as long as necessary for the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements, or to comply with legal obligations. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount,



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nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In general:

- Accounting records and data related to tenancies is retained for seven (7) years after the end of the tenancy for tax audit purposes;
- Contractual information is retained for up to six (6) years after the end of that contract;
- Marketing data is retained until you withdraw your consent, opt-out or unsubscribe.

After this period, we will securely delete or anonymise your personal data.

10. Your Rights

You have a number of rights in relation to your personal data, which allow you to access and control your information in certain circumstances. You can exercise these rights free of charge, unless your request is manifestly unfounded or excessive (in which case we may charge a reasonable administrative fee or refuse to respond to such request).

Your rights are:

- **Right to Access:** You can request access to the personal data we hold about you.
- **Right to Rectification:** You can ask us to correct or update inaccurate or incomplete data.
- **Right to Erasure:** You can request the deletion of your personal data, subject to legal constraints.
- **Right to Restrict Processing:** You can ask us to restrict the processing of your data in certain situations.
- **Right to Data Portability:** You can request your data in a machine-readable format to transfer it to another service provider.
- **Right to Object:** You can object to the processing of your data in certain cases, such as for direct marketing.
- **Right to Withdraw Consent:** Where we rely on your consent to process data, you can withdraw it at any time.
- **Right Not to be Subject to Automated Individual Decision-Making:** This is the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you, or similarly significantly affects you.

To exercise your rights, please contact us at info@sealproperties.co.uk. Please let us know what right you want to exercise and the information to which your request relates.



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11. Security of Your Data

We take reasonable precautions to protect your personal data from loss, misuse, or unauthorised access. This includes physical, electronic, and managerial measures to safeguard and secure the information we collect.

We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

12. Transfers Outside the UK

Transfers of personal data outside the United Kingdom are subject to special rules under the UK Data Protection Legislation.

We do not transfer your personal data outside of the United Kingdom or EEA; however, if we ever do so, we ensure that it is adequately protected by appropriate safeguards in accordance with the UK Data Protection Legislation.

The UK Government has recognised a number of territories, including the European Economic Area, as providing an appropriate level of protection to the data protection rights of individuals. For transfers to a territory without an 'adequacy decision', we will enter into transfer agreements, such as an International Data Transfer Agreement (**IDTA**) or under the standard contractual data protection provisions (**Standard Contractual Clauses**) with the UK's IDTA Addendum (**IDTA Addendum**). These mechanisms of transfer are recognised as being appropriate safeguards under the UK GDPR.

Please email info@sealproperties.co.uk if you would like more information on international data transfers.

13. Cookies

We use cookies to enhance your experience on our website. You can control the use of cookies through your browser settings. For more details, please see our [[Cookie Notice - insert as a link](#)].

14. Changes to This Policy

This privacy notice was last updated on [[insert date](#)].

We may update this privacy policy from time to time. Any changes will be posted on this page and, where appropriate, notified to you via email.

15. Complaints

We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your information. You may contact our Data Protection Officer by using the contact methods set out in paragraph 1 of this privacy notice.



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The Data Protection Legislation also gives you a right to lodge a complaint with the Information Commissioner, who may be contacted at the details set out below:

Information Commissioner's Office

Website: <https://ico.org.uk/>

Telephone: 0303 123 1113

Post to: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

If you would like any further information about this privacy policy or how we process your personal data, please contact us at:

Address: 167 Saltwell Road, Gateshead, NE8 4TJ

Phone: 0191 5805900

Email: info@sealproperties.co.uk



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