

GLYNN'S MANAGEMENT SERVICES LTD

Doncaster's Letting Agency

GMS — Glynn's Management Services Ltd

PRIVACY POLICY — UK GDPR Compliant

Prepared for: Teresa Glynn, Director

Version 1.0 | May 2026

ABOUT THIS PRIVACY POLICY

Glynn's Management Services Ltd ('GMS', 'we', 'us', 'our') is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, share, and protect personal data in connection with our letting and property management services.

We are the data controller for the personal data we collect. We are registered with the Information Commissioner's Office (ICO) under Registration Number ZC108293

Data Controller: Glynn's Management Services Ltd
Registered Office: Unit 7 Atlas Business Park, Balby Carr Bank, Doncaster, DN4 5JT
ICO Registration No: ZC108293
Contact: teresa@gm-services.co.uk | T: 01302 244104
Last updated: May 2026 | Next review: May 2027

This policy applies to data collected from landlords, tenants, prospective tenants, applicants, guarantors, contractors, and website visitors. It is compliant with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), and the Data (Use and Access) Act 2025 which came into force on 19 June 2025.

1. WHAT PERSONAL DATA WE COLLECT

The categories of personal data we collect depend on your relationship with GMS. These are set out below:

1.1 Landlords and Prospective Landlords

- Full name, address, and contact details
- National Insurance number, date of birth, and identity documents (for AML/KYC checks)
- Bank account details (for rent remittance)
- Property ownership and mortgage information (where relevant to our management duties)
- Financial sanctions screening data
- Communication history and correspondence

1.2 Tenants, Applicants, and Guarantors

- Full name, address history, and contact details
- Date of birth and identity documents (for Right to Rent and referencing checks)
- Employment details, payslips, and financial references
- Credit history and referencing report data (via LettingHub)
- Bank account details (where applicable)
- Next of kin / emergency contact details
- Communication history and correspondence

1.3 Website Visitors

- IP address and browser/device information (collected automatically via cookies)
- Contact form submissions and enquiry details
- Analytics data (aggregated and anonymised)

1.4 Contractors and Service Providers

- Name, business name, and contact details

- Insurance and qualification documentation
- Bank details and payment records

2. HOW AND WHY WE USE YOUR PERSONAL DATA

We process personal data for the following purposes, under the following lawful bases:

Purpose	Lawful Basis	Further Detail
Providing letting and property management services	Contract	Performance of our contract with landlords and tenants
Tenant referencing and Right to Rent checks	Legal obligation / Contract	Required by law and by our Terms of Business
Anti-money laundering (AML) checks on landlords and tenants	Legal obligation	Money Laundering Regulations 2017; UK financial sanctions regime
Rent collection and financial accounting	Contract / Legal obligation	Performance of contract; statutory accounting requirements
Property inspections and condition reporting	Contract / Legitimate interests	Fulfilling management duties and protecting landlord's asset
Maintenance and repairs coordination	Contract	Acting on behalf of the landlord under the management agreement
Compliance with health and safety obligations	Legal obligation	Gas Safety (Installation and Use) Regs; Electrical Safety Standards Regs 2020
Communicating with landlords and tenants	Contract / Legitimate interests	Routine service communication and updates
Marketing to existing clients	Legitimate interests	Promoting our services to clients with an existing relationship with GMS
Marketing to prospective clients	Consent	Only where you have opted in to receive marketing from us
Responding to complaints and disputes	Legal obligation / Legitimate interests	TPO Code of Practice; protecting GMS's legal position
Website analytics and improvement	Legitimate interests	Improving our website — data is aggregated and anonymised

3. WHO WE SHARE YOUR PERSONAL DATA WITH

We do not sell your personal data. We share it only where necessary for the purposes described above, or where required by law. Recipients may include:

- Referencing agencies — LettingHub (tenant referencing and Right to Rent)
- Inventory and inspection providers — InventoryBase
- E-signature providers — DocuSign (for tenancy agreements and management contracts)
- Property portals — Rightmove, OpenRent, Facebook Marketplace (property advertising)
- The Tenancy Deposit Scheme (TDS) — for deposit protection
- HMRC — for AML supervision reporting and financial sanctions compliance
- The Property Ombudsman — in connection with any formal complaint
- Maintenance contractors and tradespeople — to arrange repairs and inspections
- Our accountants — Affinity Associates Isaacs & Co (internal financial administration)
- Our associated solicitors — Andrew Isaacs Law Ltd (conveyancing referrals, where you have consented)
- Law enforcement or regulatory authorities — where required by law

Where we share data with third parties acting as data processors on our behalf, we ensure that appropriate data processing agreements are in place. Where data is shared with connected businesses (Andrew Isaacs Law Ltd, Affinity Associates Isaacs & Co), we will always inform you of this at the earliest opportunity and confirm that you are under no obligation to use their services.

4. HOW LONG WE KEEP YOUR DATA

We retain personal data only for as long as necessary. Our standard retention periods are:

Category	Retention Period	Reason
Tenancy records (agreements, correspondence, inventories)	6 years after tenancy end	Limitation Act 1980 — contractual claims
AML / KYC identity verification records	5 years from end of business relationship	Money Laundering Regulations 2017
Financial sanctions screening records	5 years	UK sanctions regime requirements
Complaint records	6 years from resolution	Limitation Act; TPO audit requirements
Accounting records	6 years	HMRC statutory requirement
Marketing contact data	Until consent withdrawn or 2 years of inactivity	UK GDPR — data minimisation
Website analytics data	26 months (then deleted/anonymised)	ICO guidance on cookie analytics

5. YOUR DATA PROTECTION RIGHTS

Under the UK GDPR and DPA 2018, you have the following rights in relation to your personal data:

- Right to be informed — you have the right to know how your data is used (this policy fulfils that right)
- Right of access — you can request a copy of the personal data we hold about you (a Subject Access Request)
- Right to rectification — you can ask us to correct inaccurate or incomplete data
- Right to erasure ('right to be forgotten') — you can ask us to delete your data where we have no lawful reason to retain it
- Right to restriction — you can ask us to pause processing of your data in certain circumstances
- Right to data portability — you can ask for your data in a structured, machine-readable format
- Right to object — you can object to processing based on legitimate interests or for marketing purposes
- Rights in relation to automated decision-making — we do not use automated decision-making in a way that significantly affects you

To exercise any of these rights, please contact us in writing at: teresa@gm-services.co.uk or at our registered office address. We will respond within 30 days. There is no charge for exercising your rights, except in cases of manifestly unfounded or excessive requests.

If you are dissatisfied with how we have handled your personal data, you have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office
 Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
 Helpline: 0303 123 1113

Website: www.ico.org.uk

6. DATA SECURITY

We take the security of your personal data seriously. We have implemented appropriate technical and organisational measures to protect your data against unauthorised access, loss, destruction, or disclosure. These include:

- Password-protected systems and encrypted file storage
- Restricted access to personal data on a need-to-know basis
- Secure document management using DocuSign for executed agreements
- Use of reputable, UK-based or adequacy-covered third-party service providers

In the event of a data breach that is likely to result in a risk to your rights and freedoms, we will report it to the ICO within 72 hours of becoming aware of it, and notify you without undue delay where the risk to you is high.

7. COOKIES

Our website uses cookies and similar technologies. A cookie is a small file placed on your device that helps us improve and personalise your experience. We use:

- Strictly necessary cookies — essential for the website to function. No consent required.
- Analytics cookies — to understand how visitors use our website (e.g. Google Analytics). We seek your consent before placing these.

You can control or delete cookies through your browser settings at any time. Disabling cookies may affect your experience on our website. Our full Cookie Policy is available on our website.

8. LINKS TO THIRD-PARTY WEBSITES

Our website may contain links to external websites, including property portals, professional body websites, and partner services. We are not responsible for the privacy practices of those sites and encourage you to review their privacy policies before sharing your personal data with them.

9. CHANGES TO THIS POLICY

We review this Privacy Policy annually and update it as necessary to reflect changes in our practices, services, or applicable law. The most current version is always available on our website. Where changes are material, we will notify clients and tenants directly.