

## Data Protection and Privacy

38. The Landlord or Agent, GLS Management Services Ltd acts as a Data Controller in respect of personal data. They will collect, store, and process the Tenant's information in strict accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

38.1 The Landlord or Agent may collect and process personal data including, but not limited to: full name, date of birth, contact details, residential history, employment and financial status, bank details, nationality/citizenship status, National Insurance number, and government-issued identification. This includes any information reasonably required to verify your suitability for a tenancy and to manage the agreement.

38.2 The Landlord or Agent will process the Tenant's data under the following legal frameworks:

- i. Contractual Necessity: To take steps at your request prior to entering into a tenancy and for the ongoing performance of the tenancy agreement.
- ii. Legal Obligation: To comply with statutory duties, including Right to Rent checks under the Immigration Act 2014, Financial Sanctions checks and Anti-Money Laundering (AML) regulations.
- iii. Legitimate Interests: For the efficient management of the property, ensuring the safety of the premises, and debt recovery, legal claims, possession claims provided these do not override the Tenant's fundamental rights.
- iv. Consent: Where the Tenant has provided explicit permission for specific activities (e.g., marketing), which may be withdrawn at any time.

38.3 The Tenant's data is used for:

- i. Identity verification, credit referencing, Right to Rent compliance.
- ii. Financial sanctions screening and AML checks.
- iii. General tenancy management, including rent collection and communication.
- iv. Coordinating repairs, safety inspections, and emergency maintenance.
- v. Protecting the legal rights of the Landlord or Agent, including dispute resolution or defending legal claims.

38.4 Where necessary and lawful, the Landlord or Agent may share the Tenant's data with the Landlord, professional referencing agencies, maintenance contractors, utility providers, local authorities (for Council Tax), the relevant Deposit Protection Scheme, and legal advisers. They may also disclose information to law enforcement or regulatory bodies where required by law.

38.5 The Landlord or Agent do not typically transfer personal data outside the UK. If a transfer is necessary (e.g., using a cloud service provider based overseas) and will ensure "adequacy

regulations" apply or implement Standard Contractual Clauses (SCCs) or the International Data Transfer Addendum (IDTA) to ensure all data remains protected.

38.6 Personal data is retained only for as long as necessary. For most tenancy-related data, this is typically six years following the termination of the tenancy to align with the limitation period for contract claims, unless statutory obligations require a longer period.

38.7 For full details on how data is handled, please refer to our Privacy Policy at:  
[glsmanagementservices.co.uk](https://glsmanagementservices.co.uk)