

<p><b>Kemson Ltd</b>                  Company Registration Number: 16774531                  ICO Registration Number: ZC049636                  Registered Office: Office Suite 3, Shrieves Walk,                  Stratford-upon-Avon, CV37 6GJ</p>	<p><b>Contact</b>                  Email: datacontroller@kemson.uk                  Website: kemson.uk                  Telephone: 01992 921 001</p>
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## Privacy Policy

For website visitors, clients, customers, tenants, landlords, applicants, occupiers, local authority partners, referral partners, contractors and other stakeholders

Kemson Ltd is committed to protecting personal information and handling data in a fair, lawful and transparent way. This Privacy Policy explains what information we collect, why we use it, who we may share it with, how long we keep it and what rights you have.

Kemson Ltd acts as the data controller for the personal data described in this policy. This means we decide how and why personal data is used for our business, website, lettings and property management services.

*If you have a question about this policy or want to exercise your data protection rights, please contact datacontroller@kemson.uk.*

### What personal data do we collect?

The personal data we collect depends on your relationship with us. The main types of information are set out below.

Category	Examples
Contact details	Name, address, email address, telephone number and communication records.
Website and enquiry data	Website form details, IP address, device information, usage data, cookies and analytics data.
Tenant, applicant and occupier data	Date of birth, current and previous address, ID documents, Right to Rent information, household details, references, affordability information, tenancy details and rent records.
Landlord and property data	Landlord contact details, property addresses, management records, tenancy records, rent information, maintenance records and compliance documents.
Contractor and supplier data	Contact details, business details, insurance information, invoices, payment details and service records.
Sensitive or special category data	Health information, disability or support needs, safeguarding information, vulnerability information and other sensitive information where necessary and lawful.
Criminal offence or risk-related data	Information relating to criminal records, anti-social behaviour, risk assessments or safeguarding concerns where it is necessary and lawful to process it.

### How do we collect personal data?

We may collect information from you directly and from third parties where relevant to our services.

- **Directly from you**, including through our website, enquiry forms, application forms, email, telephone, WhatsApp, text message or in person.
- From landlords, tenants, applicants, occupiers, contractors and suppliers.
- From local authorities, referral partners, support workers or partner organisations.
- From referencing providers, property platforms, software providers and publicly available sources where relevant and lawful.
- **From website tools**, including Netlify, Squarespace, monday.com forms and COHO embeds where these are used on our website.

## Why do we use personal data?

We use personal data to provide lettings, property management, accommodation-related and business administration services. This includes the following purposes:

Purpose	Examples
Enquiries and communication	Responding to website, landlord, tenant, applicant, council, contractor and general service enquiries.
Lettings and tenancy administration	Arranging viewings, assessing applications, preparing tenancy documents and managing move-in processes.
Legal and compliance checks	Completing Right to Rent checks, tenancy checks, property compliance, health and safety, licensing and other legal duties.
Property management	Managing repairs, inspections, inventories, maintenance requests, contractor attendance and property records.
Payments and accounts	Managing rent, invoices, arrears, deposits where applicable, landlord statements, contractor payments and accounting records.
Local authority and referral work	Managing referrals, placements, communications, suitability, support information and property-related updates where appropriate.
Complaints, disputes and legal matters	Investigating complaints, resolving disputes, protecting legal rights, dealing with insurance matters and responding to lawful requests.
Website and service improvement	Operating the website, improving services, monitoring performance, understanding website usage and maintaining security.

## Our lawful bases for processing

We must have a lawful basis for using personal data. Depending on the situation, we may rely on one or more of the following:

Lawful basis	When it may apply
Contract	Where processing is needed to enter into or perform a tenancy, management agreement, supplier agreement or other contract.
Legal obligation	Where we must comply with the law, such as Right to Rent, tax, accounting, health and safety, licensing, court orders or regulator requests.
Legitimate interests	Where we have a proper business reason, such as responding to enquiries, managing services, protecting property, preventing fraud, recovering unpaid sums or improving our systems.
Consent	Where we ask for consent, such as certain marketing activities or non-essential cookies. You can withdraw consent at any time.
Vital interests	In rare cases where processing is needed to protect someone's life or safety.
Substantial public interest or other lawful condition	Where special category or criminal offence data is processed for safeguarding, legal claims, housing-related risk, support needs or another lawful reason.

*Where we process special category data or criminal offence data, we will only do this where it is necessary, proportionate and permitted by data protection law.*

## Who do we share personal data with?

We only share personal data where it is necessary, lawful and proportionate. Depending on the circumstances, we may share information with:

- Landlords, tenants, applicants, occupiers and guarantors where relevant.
- Local authorities, referral partners, support agencies and partner organisations.
- Referencing providers, inventory clerks, contractors, maintenance providers and utility providers.
- Deposit protection providers, insurers, accountants, auditors, solicitors, debt recovery providers, courts, tribunals and regulators.
- Website, hosting, email, cloud, analytics and software providers, including Netlify, Squarespace, monday.com and COHO where used.

- Police, government bodies, enforcement agencies or other authorities where required or permitted by law.
- We do not sell personal data.

## Website tools, cookies and embedded services

Our website may use cookies and similar technologies. Some cookies are essential for the website to work. Others help us understand website use, improve performance, manage forms or display embedded property information.

Tool or service	How it may be used
Netlify	Website hosting, security, performance and technical delivery.
Squarespace	Website management, pages, forms or related website functionality where used.
monday.com	Referral forms, enquiry forms, workflow management and follow-up processes where connected to the website.
COHO embeds	Displaying property or accommodation information and supporting property management workflows where embedded or linked.
Analytics or tracking tools	Understanding website traffic, performance and user interaction where enabled.

*Non-essential cookies and similar tracking technologies should only be used where the required consent has been obtained. You can usually manage cookies through your browser settings or any cookie preference tool on the website.*

## International transfers

Some of our service providers may process or store personal data outside the UK. Where this happens, we will take reasonable steps to ensure appropriate safeguards are in place, such as UK-approved contractual protections or another lawful transfer mechanism.

## How long do we keep personal data?

We keep personal data only for as long as necessary for the purpose it was collected, and for any longer period required for legal, regulatory, accounting, insurance, safeguarding, dispute or legal claim reasons.

A summary retention schedule is included later in this policy. Some records may be kept longer where there is an ongoing complaint, dispute, safeguarding issue, insurance matter, arrears issue, investigation or legal requirement.

## Your data protection rights

You have rights under data protection law. These rights may include:

- The right to be informed about how we use your personal data.
- The right to access personal data we hold about you.
- The right to ask us to correct inaccurate or incomplete information.
- The right to ask us to delete your personal data in certain circumstances.
- The right to ask us to restrict processing in certain circumstances.
- The right to object to processing based on legitimate interests or direct marketing.
- The right to data portability in certain circumstances.
- The right to withdraw consent where processing is based on consent.
- The right not to be subject to certain automated decisions with legal or similarly significant effects.

To exercise your rights, please contact datacontroller@kemson.uk. We may need to confirm your identity before dealing with your request.

## Automated decision making

We do not currently make decisions about you based solely on automated processing that produce legal or similarly significant effects. If this changes, we will update this policy and provide further information where required.

## Data security

We take appropriate steps to protect personal data from loss, misuse, unauthorised access, disclosure, alteration or destruction. Measures may include access controls, passwords, secure systems, confidentiality obligations, trusted software providers, data minimisation and secure deletion where appropriate.

Email and internet communications are not completely risk-free. Please avoid sending unnecessary sensitive information unless it is needed for the matter being handled.

## Links to external websites

Our website may contain links to external websites, platforms or services. We are not responsible for the privacy practices of those external websites. You should read their privacy policies before providing personal information to them.

## Sale or restructuring of the business

If our business is sold, transferred, merged, restructured or integrated with another business, personal data may be disclosed to advisers, prospective purchasers and any new owners where necessary and lawful. Where required, we will notify affected individuals.

## Complaints or queries

If you have any questions about this policy, how we use personal data, or if you wish to make a complaint, please contact:

- **Email:** datacontroller@kemson.uk
- **Telephone:** 01992 921 001
- **Post:** Kemson Ltd, Office Suite 3, Shrieves Walk, Stratford-upon-Avon, CV37 6GJ

You also have the right to raise concerns with the Information Commissioner’s Office. The ICO can be contacted on 0303 123 1113 or through the ICO website.

## Records retention schedule

The retention periods below are a guide. Records may be kept longer where required for legal, regulatory, insurance, safeguarding, complaint, dispute or legal claim reasons.

Record type	Normal retention period	Reason
Website enquiries	Up to 12 months from last contact, unless the enquiry progresses.	Responding to enquiries and managing follow-up.
Landlord enquiry and client records	Up to 6 years after the relationship or last meaningful contact ends.	Contract, legitimate interests and legal claims.
Tenant application records where unsuccessful	Up to 12 months after the application decision, unless needed for a dispute or legal reason.	Fair process, service administration and legal claims.
Tenant application records where successful	Up to 6 years after the tenancy ends.	Contract, tenancy administration and legal claims.
Tenancy agreements and tenancy records	Up to 6 years after the tenancy ends.	Contract, legal claims and property management records.
Right to Rent check records	For the duration of the tenancy plus 1 year after the tenancy ends.	Legal obligation.
Rent, arrears, invoices and account records	Usually 6 years from the relevant financial year or relationship end.	Accounting, tax, contract and legal claims.
Deposit records, where applicable	Up to 6 years after the tenancy ends or any dispute concludes.	Tenancy administration, legal obligations and legal claims.
Inventory, inspection, repair and maintenance records	Up to 6 years after the tenancy, work or management relationship ends.	Property management, health and safety, disputes and legal claims.
Contractor and supplier records	Up to 6 years after the relationship ends.	Contract, accounting, service records and legal claims.
Local authority and referral records	Up to 6 years after the placement, tenancy or referral relationship ends, unless a longer period is required.	Contract, service administration, safeguarding where relevant and legal claims.
Safeguarding, vulnerability or risk-related records	Kept only for as long as necessary and proportionate, reviewed case by case.	Safety, safeguarding, substantial public interest and legal claims where relevant.

Record type	Normal retention period	Reason
Complaint records	Up to 6 years after the complaint is closed, unless needed longer for legal reasons.	Complaint handling, service improvement and legal claims.
Insurance records and claims	Up to 6 years after the policy, claim or matter ends, unless the insurer or law requires longer.	Insurance administration and legal claims.
Marketing preferences and suppression lists	Until you unsubscribe or object. Suppression details may be retained to ensure we do not contact you again.	Consent, legitimate interests and compliance with marketing rules.
Cookie consent records	For as long as needed to evidence consent and manage preferences.	Consent, compliance and website administration.

## Record keeping and review

We review personal data and retention requirements periodically. Hard copy and electronic information will be securely deleted, destroyed, archived or anonymised at the end of the relevant retention period unless there is a lawful reason to keep it longer.

## Document information

Document item	Details
Document owner	Director
Version	1.0
Date	May 2026
Review	Annually or sooner if legal, regulatory, website or operational requirements change