

## **GDPR & Data Protection Policy**

### **Mirador Property**

Effective Date: 07/01/2026

Review Date: 07/01/2027

### **1. Policy Statement**

Mirador Property is committed to complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We collect, process, store, and share personal data responsibly to provide property management and letting services, while protecting the privacy rights of our clients, tenants, and staff.

This policy also ensures compliance with the Rent Smart Wales Code of Practice for licensed agents.

### **2. Scope**

This policy applies to:

- Personal data of tenants, landlords, applicants, and contractors
- Employee and job applicant data
- Any other individual whose information we process

### **3. Principles of Data Processing**

We adhere to the following principles:

1. Lawfulness, fairness, and transparency – We process data only where legally permitted and provide clear information about its use.
2. Purpose limitation – Data is collected only for specified, legitimate purposes.
3. Data minimisation – We only collect data that is necessary for our services.
4. Accuracy – Personal data is kept accurate and up to date.
5. Storage limitation – Data is retained only as long as needed or required by law.
6. Integrity and confidentiality – Data is protected against unauthorised access, loss, or disclosure.
7. Accountability – We maintain records to demonstrate compliance with GDPR.

#### **4. Lawful Basis for Processing**

We process personal data based on one or more of the following lawful bases:

- Contractual necessity (e.g., tenancy management, landlord agreements)
- Legal obligation (e.g., HMRC reporting, anti-money laundering checks)
- Legitimate interests (e.g., marketing property to prospective tenants, internal administration)
- Consent (e.g., email communications, marketing updates)

#### **5. Rights of Individuals**

Individuals have the right to:

- Access their personal data
- Rectify inaccurate data
- Erase data (“right to be forgotten”) where applicable
- Restrict processing
- Object to processing for certain purposes
- Data portability where technically feasible

Requests should be made in writing to:

**Email:** [info@mpletting.co.uk](mailto:info@mpletting.co.uk)

**Post:** 53 Eversley Road, Swansea SA2 9DE

We will respond within one month (or longer if the law allows) in accordance with UK GDPR.

#### **6. Data Security**

We implement appropriate technical and organisational measures to protect personal data, including:

- Secure storage (physical and electronic)
- Password-protected systems
- Staff training on data protection
- Restricted access to sensitive information
- Regular review of security measures

## **7. Sharing Data**

We may share personal data only:

- With service providers or contractors for legitimate purposes (e.g., referencing, maintenance)
- Where legally required (e.g., law enforcement, Rent Smart Wales reporting)
- With consent from the individual concerned

We do not sell personal data to third parties.

## **8. Retention of Data**

Personal data is retained according to legal and business requirements:

- Tenancy records: 6 years from end of tenancy (or as required by law)
- Financial and accounting records: 6 years
- Marketing consents: until withdrawn

## **9. Breach Reporting**

Any personal data breach must be reported immediately to the Data Protection Officer (or Director/Manager).

Where required, breaches will be reported to the Information Commissioner's Office within 72 hours.

## **10. Responsibility**

The Director/Manager has overall responsibility for data protection. All staff must comply with this policy and report concerns.

## **11. Review**

This policy will be reviewed annually or whenever there is a change in legislation, business operations, or Rent Smart Wales guidance.