

Privacy Policy

Arcton – Property Asset Management (“Arcton”, “we”, “us”, or “our”) is committed to protecting and respecting your privacy. This policy sets out how we collect, use, store and protect your personal data in compliance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, the **Digital Information and Data Protection Act 2024 (DIDPA)**, and the **Data Use and Access Act 2025 (DUAA)**.

1. Who We Are

Arcton is a residential property asset management company specialising in the management, letting, and sale of high-quality residential properties in Central and North West London.

Data Controller: Arcton – Property Asset Management

Contact Email: info@arcton.co.uk

ICO Registration Number: [insert if registered]

2. What Personal Data We Collect

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

- **Identity Data:** full name, date of birth, gender, ID documents
- **Contact Data:** address, email, telephone number
- **Property Data:** ownership details, tenancy agreements, lease information
- **Financial Data:** payment information, bank details, income verification
- **Usage Data:** website usage information, marketing preferences
- **Technical Data:** IP address, browser type, cookies
- **Communication Data:** correspondence with us, call recordings (if applicable)
- **Profiling Data:** preferences and behavioural data used for service tailoring (see Section 9)

3. How We Collect Your Data

We collect data directly and indirectly when you:

- Contact us by email, phone, or through our website
- Instruct us to manage, let, or sell a property
- Submit a property enquiry
- View or rent a property
- Sign a tenancy agreement or other documentation
- Interact with our online services or marketing communications

We may also receive data from:

- Public records (e.g. HM Land Registry)
- Referencing agencies
- Professional advisers
- Your employer (for corporate lets)
- Property portals (e.g. Rightmove, Zoopla)

4. Legal Basis for Processing

We process your personal data under the following lawful bases:

Purpose of Processing	Legal Basis Under UK GDPR / DUAA
Letting, managing or selling property	Performance of a contract (Art. 6(1)(b))
Identity verification and referencing	Legal obligation / Legitimate interest
Marketing communications	Consent (Art. 6(1)(a)) or Legitimate interest
Financial and tax record keeping	Legal obligation

Purpose of Processing

Dispute resolution or fraud prevention
AI-driven profiling for service personalisation

Legal Basis Under UK GDPR / DUAA

Legitimate interest / Legal obligation
Explicit consent / Right to object under DUAA 2025

5. How We Use Your Data

We use your data to:

- Let, manage, or sell residential properties on your behalf
 - Match applicants with suitable properties
 - Conduct tenant referencing and due diligence
 - Process rent payments, fees, and other charges
 - Communicate with you about our services
 - Comply with legal, tax, and regulatory obligations
 - Provide relevant marketing and property updates (with your consent)
 - Analyse service usage and improve user experience
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6. Marketing and Communications

We may contact you about properties, services, or news updates relevant to your interests. You have the right at any time to:

- **Withdraw your consent**
- **Object to direct marketing**
- **Unsubscribe from communications**

To update your preferences or opt out, email info@arcton.co.uk or click “unsubscribe” in any marketing email.

7. Data Sharing and Disclosure

We may share your personal data with trusted third parties, where necessary and appropriate:

- Referencing agencies and credit check providers
- Legal and financial advisers
- Contractors and property maintenance providers
- HMRC or local authorities (where legally required)
- Property portals and software providers (e.g. CRM systems)
- IT service providers (hosting, cloud storage, email services)
- Utility companies and council tax departments (for tenancy setup)

All data sharing is subject to contractual safeguards and data protection compliance.

8. International Transfers

If we transfer your data outside the UK (e.g. for cloud storage or CRM services), we will ensure appropriate safeguards are in place, such as:

- Adequacy regulations by the UK Government
- International Data Transfer Agreements (IDTAs)
- Standard Contractual Clauses (SCCs)
- Explicit consent where required

You may request details of safeguards in place by contacting us.

9. AI and Automated Decision-Making

We may use automated tools, including AI-based software, to:

- Analyse applicant suitability for rental properties
- Tailor property matches to preferences
- Assess risks (e.g. affordability checks)

These tools do not make solely automated decisions with legal or significant effects unless you have given **explicit consent** or unless authorised by law.

You have the right to:

- Request human intervention
- Express your point of view
- Contest any automated decision

For concerns, please contact us at info@arcton.co.uk.

10. How Long We Keep Your Data

We retain personal data only as long as necessary for:

- The purposes set out in this policy
- Legal and regulatory requirements
- Limitation periods for potential claims

Typically, this is:

- **6 years** for financial and tenancy records
- **2 years** for applicant enquiries (unless converted to a let)
- **12 months** for marketing preferences (unless renewed)

Data may be anonymised and retained for statistical purposes beyond this period.

11. Your Rights

You have the following rights under UK GDPR and the DUAA 2025:

- **Right to access** – obtain a copy of your personal data
- **Right to rectification** – correct inaccurate data
- **Right to erasure** – request deletion of data (where lawful)
- **Right to restrict processing** – pause how we use your data
- **Right to data portability** – request transfer to another provider
- **Right to object** – to processing based on legitimate interests or direct marketing
- **Right to withdraw consent** – where processing is based on consent
- **Right not to be subject to automated decision-making** (see Section 9)

To exercise your rights, contact us at info@arcton.co.uk.

12. Cookies and Website Data

Our website uses cookies to improve your browsing experience and analyse website traffic. You can control cookies through your browser settings.

We use Google Analytics and other tools to understand website usage trends. No personally identifiable data is collected without your consent.

For more information, refer to our [Cookie Policy].

13. How We Protect Your Data

We implement appropriate technical and organisational measures to secure your data, including:

- Secure data storage and encryption
 - Password-protected systems and firewalls
 - Access control policies
 - Regular data protection training
 - Data breach procedures in line with ICO guidance
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14. Changes to This Policy

We may update this privacy policy from time to time. When we do, we will revise the “Effective Date” at the top. Where appropriate, we will notify you of material changes by email or prominently on our website.

15. How to Contact Us

If you have any questions about this policy or your personal data, contact:

Privacy Officer

Arcton – Property Asset Management

Email: info@arcton.co.uk

Phone: 020 3490 5950

Website: www.arcton.co.uk

16. Complaints

If you are unhappy with how we process your data, please contact us in the first instance. If you remain dissatisfied, you have the right to lodge a complaint with:

Information Commissioner's Office (ICO)

Website: www.ico.org.uk

Phone: 0303 123 1113

17. Changes to our privacy policy

This privacy notice is reviewed regularly and was last updated on 07 July 2025.