

Privacy Notice

This notice explains what information we collect, when we collect it and how we use it. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

1. Who are we?

Bright Amber Property Management Ltd. at The Oakley, Kidderminster Road, Droitwich, Worcestershire, WR9 9AY, ("we" or "us") take the issue of security and data protection very seriously and strictly adhere to guidelines published in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number ZC013890 and we are the data controller of any personal data that you provide to us. We operate primarily in Suffolk and the surrounding areas of England.

Our data protection contact is the Director at info.brightamber@gmail.com. Any questions relating to this notice and our privacy practices should be sent to info.brightamber@gmail.com.

2. How we collect information from you and what information we collect

We collect information about you including from:

- Your emails and phone calls;
- Our website;
- Application forms or surveys;
- Your enquiries via SpareRoom, Open Rent, Rightmove and other similar companies;
- COHO, the property management platform that we use; and
- Reference checks via Advanced Letting, Letting Ref, Canopy and other similar companies.

Certain non-personal information is recorded by the standard operation of our internet servers. Information such as the type of browser being used, its operating system, and your IP address is gathered in order to enhance your online experience.

We collect the following information about you:

- Prospective/tenants'/guarantors' name, email address, telephone number, date of birth, gender, address (including any current and previous addresses), relationship to other prospective tenants, marital status, National Insurance number, nationality, next of kin, job title, name of employer, annual salary, identity documents (such as passport and driver's licence) and source of enquiry;
- Prospective/landlords' name, email address, telephone number, date of birth, gender, property and current address, proof of address, proof of ownership, trust and beneficial owners, source of funds/wealth (for high-risk clients), identity documents (such as passport and driver's licence) and source of enquiry;
- Information in relation to reference checks (such as CCJs, IVA, AML sanctions check, bankruptcy, income verification);
- Information in relation to the property (such as deposit, rent, viewing date, tenancy start and end dates, tenancy duration, move-in and out dates, correspondence via COHO and emails);
- The employment status of tenants and/or guarantors, address, contact details (including email, phone and fax numbers) of the employer/accountant, payroll numbers, length of

employment, salary information (including any regular overtime or commission), and any other income received;

- Bank account details of tenants and prospective tenants, landlords and prospective landlords, including account number and sort code, and any hire purchase/loan agreements/credit cards or store cards that you have; and
- Any welfare benefits that you may be eligible for, or are currently on.

3. Why we need this information about you and how it will be used

We need your information and will use your information:

- to comply with any legal and safety obligations
- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to carry out Right to Rent checks as required under the Immigration Act 2014;
- to comply with HMO licensing requirements under the Housing Act 2004, where applicable;
- to manage serviced or short-term accommodation bookings and comply with associated safety and registration obligations, where applicable;
- to enable us to supply you with the services and information which you have requested;
- to help you to manage your tenancy;
- to carry out due diligence on any prospective tenant and/or guarantor, including whether there is any money judgements against them, or any history of bankruptcy or insolvency;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our suppliers which may affect you; and
- for all other purposes consistent with the proper performance of our operations and business.

Some of the information we collect may constitute special category personal data under UK GDPR Article 9, such as nationality or immigration status collected for Right to Rent purposes. We process such data only where necessary and on the basis of legal obligation or, where required, explicit consent.

4. Legal basis for processing your data

Under UK GDPR Article 13(1)(c), we are required to tell you the legal basis on which we process your personal data. The table below sets out our main processing activities and the legal basis we rely on for each.

Processing activity	Legal basis	Example
Tenancy management (holding deposits, rent, repairs, notices)	Performance of a contract	Managing your tenancy from referencing to end of tenancy
Referencing and pre-tenancy due diligence	Legitimate interests / legal obligation	Credit checks, CCJ searches, income verification
Right to Rent checks	Legal obligation	Immigration Act 2014 compliance
Financial sanctions screening of tenants, guarantors, landlords and beneficial owners	Legal obligation	Checking names against the UK Sanctions List before a tenancy or management agreement begins, and reporting any match to OFSI

Anti-money laundering (AML) checks	Legitimate interests	Money Laundering Regulations 2017
Debt recovery	Legitimate interests	Tracing or recovering unpaid rent
Marketing communications	Consent	Sending you information about our services (opt-out available)
Legal proceedings / compliance	Legal obligation / legitimate interests	Responding to legal claims or regulatory requirements
Renters' Rights Act 2025 compliance (periodic tenancy management, possession proceedings, Awaab's Law repairs, PRS Database registration)	Legal obligation / performance of a contract	Processing ongoing tenancy data, repair condition records, and landlord registration data under the 2025 Act
HMO licensing and management	Legal obligation	Housing Act 2004, local authority HMO licence conditions
Serviced/short-term accommodation management	Performance of a contract / legal obligation	Guest booking data, identity verification, safety compliance

5. Sharing of your information

The information you provide to us will be treated as confidential. Personally identifiable information is never sold or leased to any third parties. With your permission, we may use your contact information to send you information about our company and products. You may always opt-out of receiving future mailings as provided below.

We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- Informing tradespeople and contractors who need to carry out property repairs;
- Registering tenancy deposits with a government-approved tenancy deposit protection scheme, as required by the Housing Act 2004;
- Where we manage HMOs, disclosing data about occupants, licence holders and responsible persons to the relevant local authority (including Suffolk councils) as required under HMO licensing conditions imposed under the Housing Act 2004;
- Where we manage serviced or short-term accommodation, disclosing guest booking information, identity documents and payment details to booking platforms (such as Airbnb or Booking.com), local authorities and safety compliance bodies as required;
- Dealing with authorities, such as local councils for council tax and legal compliance and professional advisors, such as lawyers or accountants;
- Third-party providers: including credit reference agencies (tenant referencing), COHO (property management platform), and artificial intelligence (AI) tools such as Claude (Anthropic) and ChatGPT (OpenAI), which may be used to assist with administrative tasks, drafting communications and business operations;
- To carry out due diligence on you as a prospective/tenant/guarantor, including but not limited to the carrying out of affordability checks, due diligence checks and the obtaining of references from relevant parties, whose data you have provided;
- To carry out due diligence on you as a prospective/landlord, including but not limited to proof of ownership, trust and beneficial owners, source of funds/wealth (for high-risk clients);

- If required, your information shall be disclosed in order to determine if there are any money judgements against you, as the prospective tenant/guarantor, or to determine if they have a history of bankruptcy or insolvency;
- If you are unable to make payments under your tenancy, your information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you as a tenant;
- In the creation, renewal or termination of the tenancy, your information will be disclosed to the relevant local authority, tenancy deposit scheme administrator, service/utility provider, freeholder, factor, facilities manager or any other relevant person or organisation in connection with this;
- If we enter into a joint venture with or merge with a business entity, your information may be disclosed to our new business partners or owners; and
- We may disclose user information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference (either intentionally or unintentionally) with the Company's rights or property, other users of the website, or anyone else that could be harmed by such activities.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

6. How long we will keep your information

We review data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you. As a guide, we typically retain data for the following periods: unsuccessful tenancy applications – 6 months; tenancy records (including financial records) – 6 years after the tenancy ends (Limitation Act 1980 and HMRC requirements); Right to Rent check documents – 12 months after the tenancy ends; AML and referencing records – 5 years (Money Laundering Regulations 2017); HMO licence records – for the duration of the licence and 6 years thereafter; guest and serviced accommodation records – 6 years.

7. Security

When you give us information, we take steps to make sure that your personal information is kept secure and safe. For example, we ensure that data is protected against unauthorised access, data is protected in regards to its confidentiality and all legislative requirements are met. We limit who can access your personal data to individuals who need to know it and are subject by a duty of confidentiality. We also systematically monitor our processes and actions to protect confidentiality and personal data and to assist us in our ability to identify potential data breaches.

No data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit via the internet. By transmitting any such information to us, you accept that you do so at your own risk.

If we become aware of a data breach we will, if required to, notify the Information Commissioner's Office within 72 hours. If we believe that the data breach is serious, we will notify you.

8. Age restriction

Our services are intended for adults aged 18 and over. We do not knowingly collect personal data from anyone under the age of 18. If we become aware that we have inadvertently collected personal data from a minor, we will delete it promptly.

9. Use of Artificial Intelligence Tools

We may use artificial intelligence (AI) platforms, including Claude (Anthropic) and ChatGPT (OpenAI), to support our internal business operations, such as drafting documents, summarising information and improving administrative efficiency. Where personal data is inputted into such tools, we take reasonable steps to minimise the data shared. In practice, this means we avoid inputting full tenancy records, financial data or sensitive personal data into AI tools, and use anonymised or generalised information wherever possible. We use only reputable providers whose data processing terms are compatible with our obligations under the UK GDPR. Personal data will not be intentionally submitted to AI platforms for automated decision-making that produces legal or similarly significant effects without appropriate safeguards. If you have questions about how AI tools interact with your personal data, please contact us using the details provided in this policy.

10. International transfers of personal data

Some of our third-party service providers, including Anthropic (Claude) and OpenAI (ChatGPT), are based in the United States. Where your personal data is transferred outside the United Kingdom, we ensure that appropriate safeguards are in place in accordance with UK GDPR Article 46, such as standard contractual clauses approved by International Data Transfer Agreement / UK Addendum to the EU SCCs. You may request details of the safeguards we rely on by contacting us at the address below.

11. Renters' Rights Act 2025

The Renters' Rights Act 2025 came into force on 1 May 2026, making significant changes to the private rented sector in England. All assured shorthold tenancies became periodic assured tenancies on that date, meaning we will process ongoing tenancy data with no fixed end dates. Section 21 'no-fault' evictions have been abolished, and we may need to process additional data when seeking possession under the new statutory grounds. Under Awaab's Law provisions, when extended to the private rented sector (no confirmed date; expected in a later phase following consultation), we may also process data relating to property conditions and repair timescales where hazards are reported. We will additionally process data in connection with the new Private Rented Sector Database, which is due to roll out regionally from late 2026 with a full national launch in 2027.

12. Use of cookies

Our website may use cookies – small text files placed on your device – to help it function properly. We only use cookies that are strictly necessary for the operation of the website (for example, to remember your preferences during a session). We do not use tracking or advertising cookies, and we do not share cookie data with third parties for marketing purposes. You can set your browser to refuse cookies, but some parts of the website may not then function as intended. For more information about how we use cookies, please contact us using the details below.

13. Malware/spyware/viruses

Neither we nor our website knowingly permit the use of malware, spyware, viruses, and/or other similar types of software.

14. Links to external sites

We are not responsible for the content or practices of third party websites that may be linked to the website. We are also not responsible for any information that you might share with such linked websites. You should refer to each website's respective privacy policy and practices prior to disclosing any information.

15. Updates to this notice

We keep this Privacy Notice under regular review and may update it from time to time to reflect changes in law, technology or our business practices. Where we make significant changes we will notify you directly where required to do so by law. The current version of this notice is always available on our website and on request. Continued receipt of our services does not constitute acceptance of this notice – your data rights under UK GDPR exist independently of any acceptance.

16. Your rights

You have the right at any time to:

- the right to ask for a copy of the information we hold about you;
- the right to require us to correct any inaccuracies in your information;
- the right to request deletion of your personal data;
- the right to object to receiving any marketing communications from us;
- the right to restrict our processing of your personal data – for example, while we verify the accuracy of information you have contested;
- the right to data portability – to receive personal data you have provided to us in a structured, commonly used, machine-readable format, where processing is based on your consent or a contract and carried out by automated means;
- the right to withdraw consent at any time, where processing is based on your consent (this will not affect the lawfulness of processing before withdrawal); and
- the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal or similarly significant effects concerning you.

If you would like to exercise any of your rights above please contact us at info.brightamber@gmail.com.

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113
Email: casework@ico.org.uk

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.

Version 3

Last reviewed: August 2026

Next review: August 2027