Privacy Notice

Version 2 | Effective 13/11/2026 | Supersedes the version dated 04/07/2025

1. About this notice

Warwick Estates is a property management company. We manage residential developments across England and Wales on behalf of our clients, who are freeholders, resident management companies (RMCs), right to manage (RTM) companies, developers and other property owners. We do not own any of the properties we manage and we have no proprietary interest in them. We act on our clients' instructions and under the management agreements we hold with them.

To do that job we have to handle information about the people who own, live in, visit and work on the developments we manage and about the people we do business with. This notice explains what personal information we hold, where we get it from, what we do with it, who we share it with, how long we keep it and what rights you have.

It applies to everyone whose personal information we handle, except our own employees, workers and job applicants, who have a separate privacy notice.

We handle personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003, each as amended by the Data (Use and Access) Act 2025. Our regulator is the Information Commission, which continues to be known as the ICO.

2. Who we are and how to contact us

Warwick Estates Property Management Ltd is a company registered in England and Wales under company number 06230550. Its registered office is at One Station Approach, Harlow, Essex CM20 2FB. In this notice, “we” and “us” mean that company, trading as Warwick Estates, Warwick Lite and Warwick Premier.

We are registered with the ICO as a data controller under registration number Z168618X.

Our data protection team deals with questions about this notice and requests about your personal information. You can contact them in any of these ways:

- Email: data.protection@we-pm.co.uk
- Post: Data Protection Team, Warwick Estates, One Station Approach, Harlow, Essex CM20 2FB
- Telephone: 01279 957 400 (Monday to Friday, 8am to 9pm), or Live Chat on our website

The current version of this notice is always published at https://we-pm.co.uk/privacy-policy/ and is linked in our email footers.

3. Our role, and our clients' role

For most of what we do we are a **controller**: we decide, as a professional managing agent, how personal information is used to manage a development. Our client for your development, usually the freeholder, the RMC or the RTM company, is a separate controller in its own right. So, in some cases, are the developer, the buildings insurer and individual contractors.

Sometimes a client asks us to carry out a specific task purely on its behalf and on its instructions. For that task we act as the client's **processor**, under a written agreement that requires us to follow its instructions and keep the information secure. The client is then responsible for telling you how it uses your information. If you would like the client's own privacy information, or its contact details, please ask us and we will put you in touch.

The name and address of your landlord is given on every service charge and ground rent demand we send.

4. Whose information we handle

- Leaseholders, freeholders and other owners of homes on developments we manage, including former owners
- Tenants, sub-tenants, residents, other occupiers and members of their households
- Directors, officers, members and company secretaries of RMCs and RTM companies
- Our clients and their staff and representatives
- Buyers, sellers and their conveyancers, mortgage lenders and letting agents
- Contractors, suppliers, professional advisers and their staff, including operatives who attend site
- Prospective clients and other business contacts
- Anyone who contacts us, including enquirers, complainants and witnesses
- Visitors to our websites, portals and apps
- People whose images, access records or calls are recorded, as described in section 9

5. Leaseholders, residents and other occupiers

5.1 What we collect

- Name, home and correspondence addresses, email addresses and telephone numbers and how you prefer us to contact you
- Details of emergency contacts or representatives you give us, such as a family member, carer or someone holding a power of attorney
- Details of your property, including your lease, title number, service charge apportionment and your mortgage lender
- Service charge, ground rent, reserve fund and other account information, including payment history, arrears and recovery action

- Payment information, such as the name and bank account you pay from, payment references and records of the payments you make
- Enquiries, reports, complaints and correspondence, and the notes and records we make about them
- Information about your use of the development, such as keys and fobs issued, parking permits, vehicle registration marks and access records
- Information we hold because your lease or the law requires it, such as notices of assignment and charge, sub-letting, alterations, consents and pets
- Information about insurance claims affecting your property or the building
- Information about support needs or circumstances that make you vulnerable, where you or someone acting for you tells us, so that we can take them into account
- Information needed for fire and building safety, including evacuation planning (see section 5.3)
- Your tenant reference, login and usage details, the tickets you raise and your communication preferences (including whether you have agreed to receive bills and notices by email), if you use our customer portal
- Records of your calls and Live Chat conversations with us, and still images and video footage from CCTV and door-entry systems where these are provided to us in connection with a specific matter (see section 9)

5.2 Where we get it from

Directly from you, and also from: our client for the development; the previous managing agent; your solicitor, or the solicitor acting on a sale or purchase; the developer; HM Land Registry; your mortgage lender; your letting agent; contractors and suppliers; other residents; and publicly available sources such as Companies House.

5.3 Sensitive information

Some of the information we handle is “special category” information (such as information about health) or criminal offence information. The law gives it additional protection and we handle it only where we need to.

Fire safety and evacuation planning. Since 6 April 2026, the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 have required the responsible person for residential buildings at least 18 metres or seven storeys high, and for buildings at least 11 metres high with a simultaneous evacuation strategy, to make reasonable efforts to identify residents who may not be able to evacuate unaided, to offer them a person-centred fire risk assessment and, where appropriate, a residential personal emergency evacuation plan.

The Regulations also provide for limited information about a resident's evacuation needs to be shared with the fire and rescue service, including through the building's secure information box where there is one.

Where we carry out these steps for a building we manage, we will handle information about mobility, sensory, cognitive and other conditions that affect a person's ability to evacuate. Taking part is voluntary and you can withdraw at any time.

Health and vulnerability. We also handle health information, and information about circumstances that make someone vulnerable, where you or someone acting for you tells us about it in connection with access needs, reasonable adjustments, a repair, a complaint or arrears.

Criminal offence information. We may handle information about alleged or actual offences where it arises from antisocial behaviour, criminal damage, trespass, fraud or breaches of the lease on a development we manage, or in connection with debt recovery and legal proceedings.

As well as a lawful basis under section 5.4, the law requires a separate condition for special category information. Depending on the purpose, we rely on: your explicit consent, including for health information you choose to give us about support or access needs (Article 9(2)(a) UK GDPR); protecting someone's vital interests where they are physically or legally unable to consent (Article 9(2)(c)); establishing, exercising or defending legal claims (Article 9(2)(f)); or, for our fire and building safety duties and for safeguarding individuals at risk, substantial public interest (Article 9(2)(g)) under Schedule 1 to the Data Protection Act 2018.

We process criminal offence information only where Article 10 UK GDPR and a condition in Schedule 1 to the Data Protection Act 2018 permit it.

5.4 Why we use it, and our lawful basis

What we use your information for	Our lawful basis
Day-to-day management of the development: repairs, maintenance, site inspections, health and safety, out-of-hours emergencies, correspondence, portal tickets and enquiries	Legitimate interests (Article 6(1)(f)): our interest, and our client's, in the proper management of the development and in our performing the management agreement with our client
Preparing budgets and accounts, issuing service charge and ground rent demands, collecting sums due, giving statutory information and consulting on major works and long-term agreements	Legitimate interests: enabling our client to perform the lease and meet its duties under the Landlord and Tenant Acts 1985 and 1987, the Commonhold and Leasehold Reform Act 2002 and, as its provisions come into force, the Leasehold and Freehold Reform Act 2024
Recovering arrears, notifying your mortgage lender where the lease or mortgage allows, and bringing or defending proceedings, including in the First-tier Tribunal (Property Chamber) and the county court	Legitimate interests: recovering sums lawfully due and protecting the position of our client and of other leaseholders, who would otherwise bear the shortfall

What we use your information for	Our lawful basis
Fire safety and building safety: fire risk assessments, evacuation planning, the golden thread of building information, resident engagement and safety case duties	Legal obligation (Article 6(1)(c)) where the duty falls on us, for example where we have control of the common parts under the Regulatory Reform (Fire Safety) Order 2005; otherwise legitimate interests in enabling our client to meet its duties under that Order, the Fire Safety (England) Regulations 2022, the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 and the Building Safety Act 2022. See also section 5.3
Arranging and administering buildings insurance and handling claims including arranging insurance as an appointed representative of an authorised insurance broker regulated by the Financial Conduct Authority	Legitimate interests; and legal obligation under the rules that apply to arranging insurance
Providing leasehold information packs and pre-sale information, registering notices of assignment and charge, and dealing with requests for consent	Contract (Article 6(1)(b)) where you order or pay for a service from us directly; otherwise legitimate interests in enabling sales, lettings and mortgages to proceed
Responding to requests that the law entitles others to make, such as from a recognised tenants' association, an RTM company or a nominee purchaser in an enfranchisement claim	Legal obligation
Preventing, detecting and investigating crime, antisocial behaviour and fraud; safeguarding vulnerable people; responding to emergencies; and answering requests from public bodies that need the information for their functions	Recognised legitimate interests (Article 6(1)(ea) and Annex 1 to the UK GDPR, inserted by the Data (Use and Access) Act 2025), where the processing is necessary for crime prevention, safeguarding, an emergency or a request from a public body that meets the relevant Annex 1 condition. Otherwise, including for antisocial behaviour that is not criminal, legitimate interests: protecting residents, property and the proper management of the development. Legal obligation where the law requires us to disclose information.
Running our business: record keeping, quality monitoring, training, audit, keeping our systems secure, and sharing information within our group for internal administrative purposes	Legitimate interests
Meeting our obligations as a business, including tax and accounting duties, anti-money laundering checks when providing Company Secretarial services, and the requirements of our redress scheme and professional bodies	Legal obligation, and legitimate interests

What we use your information for	Our lawful basis
Sending you newsletters or information about optional services that are not part of the management of your development	Consent, which you can withdraw at any time

Where we rely on legitimate interests or recognised legitimate interests, you have the right to object; see section 14. More than one lawful basis may apply to an activity, depending on the circumstances and on our role for that development.

If you do not give us information. Much of the information we ask for is needed under your lease or by law. If you do not provide it we may not be able to contact you about works or safety matters, apply your payments correctly, or deal with a sale or consent request.

5.5 Who we share it with

We share personal information with the following types of recipient, only where there is a proper reason to do so and only as much as they need:

- The client for your development, and its directors and officers
- Contractors, maintenance providers, surveyors, engineers, fire and building safety consultants and other suppliers
- Insurers, insurance brokers and loss adjusters
- Solicitors, barristers, debt recovery agencies, enforcement agents, and the courts and tribunals
- Your mortgage lender, where the lease or mortgage allows, for example about arrears
- Buyers' and sellers' conveyancers, and HM Land Registry, in connection with a sale, letting or mortgage
- Accountants, auditors and bookkeepers
- Utility suppliers and energy brokers
- Parking management and enforcement providers
- Recognised tenants' and residents' associations, RTM companies and nominee purchasers, where the law requires it or you have consented; where we rely on your consent you can withdraw it at any time
- The developer for your site, which may in some cases be a controller in its own right
- The fire and rescue service, the Building Safety Regulator, local authorities, the Health and Safety Executive and other regulators
- Our IT, software, communications, telephony, payment and document storage providers
- Our out-of-hours emergency call handling provider, a firm of chartered loss adjusters with access to our systems
- Our own professional advisers, auditors and insurers
- An incoming managing agent or our client, if we stop managing your development

- Our redress scheme, The Property Ombudsman, and any other ombudsman dealing with a complaint; and the Association of Residential Managing Agents (ARMA) where its membership standards require it
- Other companies in the IFOS group of companies, for internal administrative purposes
- The police and other authorities, where the law requires or permits it
- A prospective buyer, investor or lender and their advisers, in connection with any sale, reorganisation, refinancing or investment involving our business, and the buyer if such a transaction completes

We do not sell personal information, and we do not share it with third parties for their own marketing.

6. Clients, contractors, suppliers and other business contacts

If you are a client, a director of a client company, a contractor, a supplier, a professional adviser or another business contact, we will usually hold your name, job title, employer, business address, business email address and telephone number, together with a record of our dealings with you and any information needed to provide or receive a service.

If you or your organisation works for us as a contractor or supplier, we will also hold the information you give us through our contractor accreditation process. That includes insurance certificates, qualifications, trade accreditations, health and safety documentation, method statements, references, bank details for payment, and the names and contact details of the operatives who attend site.

We use this information to perform our contract with you or your organisation; to accredit, instruct and pay contractors and check that they are competent and adequately insured; to manage the developments we are instructed on; to meet our legal obligations, including our health and safety, fire safety and building safety duties; and, relying on legitimate interests, to run and develop our business. We collect it from you, your organisation, our clients, previous managing agents, solicitors, accreditation schemes and public sources such as Companies House.

We share it with the recipients listed in section 5.5 where relevant, with our clients where they ask us to show the competence and insurance of contractors working on their development, and with our website, IT, marketing and survey platform providers.

7. Prospective clients and marketing

If you are, or represent, an organisation that may be interested in our services, we may contact you about them, relying on legitimate interests. We send marketing by email or text message only where you have consented or where the law otherwise allows it, for example to corporate email addresses or to existing customers about similar services. Every message tells you how to

opt out, and you can opt out at any time using the details in section 2. We keep a record of your preference so that we do not contact you again.

8. Our websites, portals, apps and cookies

When you use our website (we-pm.co.uk), our customer and directors' portals or Live Chat, we collect technical information about your device and how you use them, including through cookies and similar technologies. Cookies that are strictly necessary for the site to work are always active. We set statistics cookies, including Google Analytics, and preferences cookies only where you have consented or, where the law allows it, after giving you clear information and a simple, free way to refuse. We set marketing cookies only with your consent. You can change your choices at any time using the "Manage consent" option on our website.

If you have a customer or directors' portal account, we use your tenant reference, login details and activity to run your account, keep it secure, deal with the tickets you raise and show you information about your property and account. If you use Live Chat, we keep a record of the conversation. If you leave a review on a third-party site such as Trustpilot, that site's own privacy notice applies, and we may reply to you there. Our website is not intended for children.

9. CCTV, door entry, access control and call recording

On the developments we manage, any CCTV, door-entry or access-control system belongs to our client. The client is the controller for it and is responsible for its signage, privacy information, access requests and retention. If you want to request footage, or raise a concern about a system on your development, please contact us and we will tell you who the operator is and pass your request on.

Where we arrange the installation, servicing or monitoring of a system, or have access to it, on a client's behalf, we do so as the client's processor and on its instructions. Our offices are not covered by CCTV operated by us.

Sometimes the operator of a system gives us footage or access records, or we ask for them, in connection with a specific matter, for example an insurance claim, a repair, an incident on site, or an allegation of antisocial behaviour or damage to the building. We are responsible for any copy we hold. We keep it only for as long as that matter is open and for six months afterwards, and share it only with the client, insurers, loss adjusters, contractors, advisers or authorities who need it for that matter.

We record telephone calls into and out of our Customer Care team, for training, quality monitoring and to keep an accurate record of what was said. You are told at the start of the call. Recording stops if your call is transferred to another member of staff outside the Customer Care team, and calls made to or from other teams are not recorded. Recordings are kept for no more than six months and are then deleted automatically.

Outside our opening hours, calls to our main number are answered on our behalf by our appointed chartered loss adjusters, who keep a record of the call and pass the details to us.

10. Automated decisions and the use of technology

We do not make decisions about you based solely on automated processing that have a legal or similarly significant effect on you. We use technology, including AI-assisted tools, to help our staff with tasks such as drafting correspondence, summarising documents and routing enquiries. Our staff remain responsible for decisions and for what we send you, and review the tools' output in a way that suits the task and its risks. We assess these tools before we use them and protect your information through contracts and other safeguards.

11. How long we keep your information

We keep personal information only for as long as we need it. Our standard retention periods are:

Type of information	How long we keep it
Leaseholder, owner and occupier records for a development we manage	For as long as we manage the development.
Records when we stop managing a development	We hand the management records over to our client or the incoming managing agent, as the management agreement requires. We keep a copy only of what we may need to answer claims or complaints about the period we managed: service charge accounts and demands, major works and consultation records, and complaint and claim files. We keep these for up to twelve years after our management ends, because claims relating to a lease, which is a deed, can be brought for up to twelve years (section 8, Limitation Act 1980) and we may need these records to answer them. Other correspondence and contact details are kept for up to six years, the period for claims in contract (section 5 of that Act). We delete records sooner where they are no longer needed.
Records of former owners and occupiers who left while we were managing	Contact details and correspondence: six years after the end of the financial year in which their interest or occupation ended, or longer while any balance, claim or dispute remains open. Their entries in the development's service charge accounts are kept as part of those accounts (see above).
Service charge accounts, financial records and payment history	As above. Records we need for tax and accounting purposes are kept for at least six years from the end of the financial year they relate to.

Type of information	How long we keep it
Fire safety and building safety records, including golden thread information	Held for our client while we manage the building and transferred to it or the incoming managing agent when we stop. We keep a copy only where we may need it to answer a claim, for no more than 15 years after our management ends, which is the longest period in which a negligence claim for hidden damage can be brought (section 14B, Limitation Act 1980). We keep personal information in these records to a minimum and review whether we still need them.
Health, disability and evacuation planning information	Only while the plan is current and you live at the development. Reviewed at least every 12 months, and securely deleted within three months of us learning that the plan no longer applies (for example because you have moved out), unless we need it to defend a legal claim.
CCTV footage or access records received from a site system	For as long as the matter it relates to is open, and six months afterwards. The original is held by the system operator under its own retention policy.
Recordings of calls with our Customer Care team	Up to six months, then deleted automatically. If a recording relates to a complaint, investigation or legal claim that is already under way when the six months end, we keep a copy for that purpose only until it is resolved.
Live Chat transcripts	Six months, unless the conversation forms part of a ticket, complaint or account record, in which case it is kept with that record.
Client, contractor, supplier and other business contact records	For as long as our business relationship continues and six years afterwards. Marketing contacts with whom we have no business relationship: two years from our last contact.
Data protection requests, complaints and related records	Six years from the date the matter is closed.

We may keep information for longer where the law requires it, or where it is needed for ongoing or reasonably anticipated legal proceedings, a regulatory investigation or an insurance claim. These are maximum periods: we delete or anonymise information sooner where we no longer need it. Information that has been anonymised so that it can no longer identify you may be kept and used for statistics and to improve our services.

12. Sending information outside the UK

Some of the organisations we work with, in particular IT, software, communications and document storage providers, are based outside the UK, or store or access information from outside it.

We transfer personal information outside the UK only where the law allows it and one of the following applies: the country, or the recipient, is covered by UK adequacy regulations (for

example, US organisations certified under the UK Extension to the EU–US Data Privacy Framework); or we have put appropriate safeguards in place, such as the International Data Transfer Agreement or the UK Addendum to the EU standard contractual clauses, supported by an assessment of the risks involved. In limited circumstances we may rely on an exception the law allows, for example where a transfer is necessary for legal claims.

You can ask us which safeguard applies to a particular supplier or transfer, and for a copy of it, using the details in section 2.

13. Keeping your information secure

We have appropriate technical and organisational measures in place to protect personal information against loss, misuse and unauthorised access. We limit access to people who have a genuine business need, everyone handling your information is subject to a duty of confidentiality, and we require our suppliers to protect it to the same standard.

We have procedures for dealing with suspected personal data breaches. Where we are legally required to, we will report a breach to the ICO within 72 hours of becoming aware of it, and we will tell you without undue delay if a breach is likely to result in a high risk to you.

Protecting yourself from fraud. Each development we manage has its own ring-fenced bank account, and its details are shown on your demand for payment. If you receive a message asking you to pay using different bank details, please call us on 01279 957 400 before making any payment.

14. Your rights

You have the following rights, which are free of charge:

- To be told, clearly and transparently, how we use your personal information
- To ask for a copy of the personal information we hold about you
- To have inaccurate information corrected, and incomplete information completed
- To ask us to erase your information in certain circumstances
- To ask us to restrict how we use your information in certain circumstances
- To receive information you have given us in a structured, commonly used, machine-readable format, and to have it sent to another organisation, in certain circumstances
- To object at any time to the use of your information for direct marketing
- To object, on grounds relating to your particular situation, to our use of your information where we rely on legitimate interests or recognised legitimate interests
- To withdraw your consent at any time where we rely on consent; this does not affect anything we did before you withdrew it

- Where a significant decision is made about you based solely on automated processing, to be told about it, to make representations, to obtain human intervention and to contest the decision
- To claim compensation for damage caused by a breach of data protection law

Some of these rights apply only in certain circumstances. The ICO publishes guidance on each of them at ico.org.uk.

How to exercise your rights

Contact us using the details in section 2, telling us which right you want to exercise and what information your request relates to, including any account or property reference. If your request concerns information that our client holds as controller, we will pass it to the client and tell you that we have done so.

We will respond without undue delay and within one month. Where we reasonably need information to confirm your identity, the month starts when we receive it. If your request is complex, or you have made a number of requests, we may extend that by up to two further months; if so, we will tell you within the first month and explain why.

For a request for a copy of your information, if we hold a large amount of information about you and reasonably need you to clarify what your request covers, we will ask promptly and the time limit will pause until you reply. We will carry out reasonable and proportionate searches for the information you ask for.

Usually your name, address and account or property reference will be enough to identify you. We will ask for identity documents only where we have a genuine reason to doubt who you are, and no more than we need. We may need to withhold information about other people, such as other residents or witnesses, unless they agree or it is reasonable to disclose it.

If someone asks for information on your behalf, such as a family member, solicitor or support worker, we will ask for evidence that you have authorised them, or that they hold a power of attorney, before we share anything.

We will not charge a fee unless a request is manifestly unfounded or excessive, in which case we may charge a reasonable fee or decline to act, and will explain why.

15. How to complain

If you are unhappy with how we have handled your personal information, please tell us. We would rather put things right ourselves.

You can make a data protection complaint by emailing data.protection@we-pm.co.uk or by writing to the Data Protection Team, Warwick Estates, One Station Approach, Harlow, Essex CM20 2FB. Complaints about our management services generally should be made under our

Complaints Handling Procedure, which is available in the Complaints section of https://we-pm.co.uk/faqs/, or by contacting Feedback@we-pm.co.uk.

We will acknowledge your data protection complaint within 30 days of receiving it, investigate it without undue delay, keep you informed of progress and tell you the outcome.

You can also complain to the Information Commission (known as the ICO), the UK's data protection regulator, which took over from the Information Commissioner's Office on 30 September 2026. The ICO will normally expect you to have raised the matter with us first.

- Online: https://ico.org.uk/make-a-complaint/
- Telephone: 0303 123 1113
- Post: Public Advice and Data Protection Complaints Service, ICO Head Office, 4th Floor, No.3 Circle Square, 5 Hawkshaw Street, Manchester M1 7BL

16. Changes to this notice

We review this notice at least once a year and whenever the law or our practices change. The current version, with its effective date, is always available at the address in section 2. If we make a significant change that affects you, we will tell you before it takes effect.