

BPM

BESPOKE PROPERTY MANAGEMENT (BPM) LIMITED

PRIVACY NOTICE

LEASEHOLDERS AND RESIDENTS

We process personal data relating to leaseholders, tenants, occupiers and residents in order to deliver the property management services we provide on behalf of our clients and to comply with our legal and contractual obligations. Please contact the data controller if you require more information about this privacy notice: management@bpm.london

Purpose	Personal Data Used	Lawful Basis
Communicating estate and building management information	Name, address, contact details	Legitimate Interests
Managing service charge and reserve fund accounts	Name, correspondence address, contact details, account information, payment records	Contract / Legitimate Interests
Collecting service charge and other payments	Name, bank payment information, account history	Contract
Managing maintenance, repairs and contractor attendance	Name, property address, contact details	Contract / Legitimate Interests
Managing building safety, fire safety and statutory compliance	Name, property details, emergency contact details where provided	Legal Obligation / Legitimate Interests
Managing complaints and enquiries	Name, contact details, complaint records, correspondence	Legitimate Interests
Managing breaches of lease, estate regulations or anti-social behaviour	Name, contact details, correspondence and supporting evidence	Legitimate Interests
Administering access control, key management and visitor access	Name, contact details, access records	Legitimate Interests
Managing vehicle parking (where applicable)	Name, contact details, vehicle registration	Legitimate Interests
Operating CCTV systems (where installed)	CCTV images	Legitimate Interests

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Purpose	Personal Data Used	Lawful Basis
Insurance claims and legal proceedings	Name, contact details, claim information and supporting evidence	Legal Obligation / Legitimate Interests
Anti-Money Laundering and sanctions screening (where applicable)	Name, date of birth, address, identification documents and screening information	Legal Obligation

CLIENTS

We process personal data relating to our clients to deliver property management, estate management and facilities management services.

Purpose	Personal Data Used	Lawful Basis
Client onboarding	Name, contact details, contract information	Contract
Managing client relationships	Name, contact details, correspondence	Contract
Financial administration and invoicing	Name, contact details, payment details	Contract
Providing management reports and statutory information	Name, contact details	Contract
Managing complaints	Name, contact details, complaint records	Legitimate Interests
Compliance with legal and regulatory obligations	Name, contact details, due diligence information	Legal Obligation
Anti-Money Laundering and sanctions screening (where applicable)	Name, address, date of birth, identification documents	Legal Obligation

SUPPLIERS AND CONTRACTORS

We process personal data relating to suppliers and contractors in order to procure services and manage contractual relationships.

Purpose	Personal Data Used	Lawful Basis
Supplier onboarding	Name, business contact details, payment information	Contract

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Purpose	Personal Data Used	Lawful Basis
Contractor management	Name, contact details, qualifications, insurance details	Contract
Payment of invoices	Name, bank details, payment history	Contract
Health and safety compliance	Name, qualifications, competency records	Legal Obligation
Managing enquiries and correspondence	Name, contact details	Legitimate Interests
Anti-Money Laundering and sanctions screening (where applicable)	Name, address, identification documents	Legal Obligation

MEMBERS OF THE PUBLIC

We may process personal data relating to visitors or members of the public who contact BPM or attend buildings under our management.

Purpose	Personal Data Used	Lawful Basis
Responding to enquiries	Name, contact details, details of enquiry	Legitimate Interests
Visitor management	Name, contact details	Legitimate Interests
Building access	Name, contact details, access records	Legitimate Interests
Key management	Name, contact details	Legitimate Interests
Car parking administration	Name, contact details, vehicle registration	Legitimate Interests
CCTV (where installed)	CCTV images	Legitimate Interests

EMPLOYEES AND JOB APPLICANTS

We process personal data relating to employees and applicants in connection with recruitment, employment and legal obligations.

Purpose	Personal Data Used	Lawful Basis
Recruitment	CV, employment history, qualifications, references	Contract / Legitimate Interests
Employment administration	Personal details, payroll, pension and tax information	Contract / Legal Obligation

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Purpose	Personal Data Used	Lawful Basis
Health and safety	Emergency contacts, training and competency records	Legal Obligation
Performance management	Employment records	Contract
Right to work checks	Identification documents	Legal Obligation

ANTI-MONEY LAUNDERING (AML), SANCTIONS SCREENING AND REGULATORY COMPLIANCE

As a RICS regulated firm supervised by HM Revenue & Customs (HMRC) under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, BPM is required to undertake customer due diligence and, where appropriate, Anti-Money Laundering (AML), sanctions and identity verification checks.

These checks enable us to:

- verify the identity of our clients and other relevant individuals;
- comply with our statutory and regulatory obligations;
- prevent fraud, money laundering and terrorist financing;
- protect client money and assets entrusted to us; and
- maintain the integrity of our business.

Where appropriate, we may use specialist third-party providers to undertake identity verification, sanctions screening and Politically Exposed Person (PEP) checks. These providers may compare the information you provide against official sanctions lists, PEP registers and other authorised databases.

Where identity verification is undertaken electronically, our providers may consult credit reference agencies solely for verification purposes. These searches are not applications for credit, do not affect your credit rating and are used only to confirm identity.

Personal data processed for these purposes may include:

- Name;
- Date of birth;
- Residential address;
- Contact details;
- Government-issued identification documents;
- Proof of address;
- Information obtained from sanctions lists, PEP registers and other authorised databases; and

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- Other information reasonably required to comply with applicable legislation

The lawful basis for this processing is compliance with a legal obligation. Where appropriate, we may also rely upon our legitimate interests in preventing fraud, protecting client money and safeguarding our business.

Information obtained for AML purposes will be retained only for the period required by applicable legislation and regulatory requirements.

OUR LEGITIMATE INTERESTS

Where BPM relies upon Legitimate Interests as the lawful basis for processing personal data, we have carefully considered the impact on individuals and are satisfied that our legitimate interests are not overridden by your rights and freedoms.

Our legitimate interests include:

- Delivering property management, estate management and facilities management services
- Administering service charge and reserve fund accounts
- Managing residential and mixed-use developments safely and efficiently
- Protecting client money in accordance with the RICS Client Money Protection Scheme
- Complying with our obligations as a RICS regulated firm
- Meeting our obligations under the Building Safety Act 2022 and associated legislation
- Recovering service charges, administration charges and other monies lawfully due
- Preventing fraud, financial crime and misuse of client funds
- Protecting residents, visitors, employees and contractors
- Protecting buildings and other assets under our management
- Investigating complaints, breaches of lease, nuisance and anti-social behaviour
- Establishing, exercising or defending legal claims
- Improving our services through customer feedback and quality assurance
- Maintaining effective business administration, governance and regulatory compliance

WHO WE MAY SHARE YOUR INFORMATION WITH

Where necessary and lawful, we may share personal data with:

- Freeholders
- Resident Management Companies (RMCs)
- Right to Manage Companies (RTMs)

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- Management Companies
- Developers
- Managing agents appointed by our clients
- Contractors and specialist consultants
- Solicitors, surveyors, accountants, insurers and other professional advisers
- Utility providers
- Local authorities
- Government departments
- HM Revenue & Customs
- Banking partners and payment service providers
- Identity verification and AML screening providers
- The Royal Institution of Chartered Surveyors (RICS)
- The Information Commissioner's Office (ICO)
- The Building Safety Regulator
- Law enforcement agencies where required by law
- IT service providers who process information on our behalf

We will only share personal data where there is a lawful basis to do so and only where the recipient requires the information for a legitimate purpose.

