

Data Protection Policy

Carlisle Property Management -- a trading name of LEARN @ CYBERCAFE LIMITED

Document	Data Protection Policy
Trading name	Carlisle Property Management
Registered entity	LEARN @ CYBERCAFE LIMITED
Company number	05148419 (registered in England and Wales)
Registered office	6 Brunswick Street, Carlisle, United Kingdom, CA1 1PN
Website	https://carlislepropertymanagement.co.uk
Data Protection Lead	Ian Irving
Contact	DPO@carlislepropertymanagement.co.uk
Effective from	19 May 2026
Version	1.0

1. Who we are

Carlisle Property Management ("CPM", "we", "us") is a trading name of LEARN @ CYBERCAFE LIMITED, a company registered in England and Wales. We provide residential property management services to landlords and tenants in Carlisle and the surrounding area.

We are the **data controller** for personal data we collect from landlords, tenants, prospective tenants, contractors, and visitors to our website.

2. What personal data we collect

From visitors to our website

- IP address, browser, device type, referrer, pages viewed (server logs and analytics cookies, where consented to).
- Enquiry-form data: name, contact details, the property you are enquiring about, your message.

From landlords (our clients)

- Identifying information: name, address, telephone, email, bank details for rent transfers.
- Property information: address, condition reports, EPC, EICR, gas safety certificates, tenancy history.
- Where you are an overseas landlord: HMRC NRL1 status reference.

From tenants and prospective tenants

- Identifying information: name, current address, phone, email, date of birth (where required for referencing).
- Right-to-rent documentation: passport / share-code / Home Office documents -- handled per the statutory Right to Rent code.
- Referencing data: employment status, employer name, income evidence, prior-landlord references, guarantor details (where required).

- Tenancy paperwork: AST, deposit-protection certificate, inventory, statement of condition, correspondence, maintenance requests.
- Payment data: rent receipts, arrears records, deposit-return calculations.

From contractors and tradespeople

- Contact and contracting information, insurance details, gas-safe / NICEIC certifications.

Special category and statutory data

We may handle the following, only where strictly necessary for the property-management service:

- Right-to-rent evidence (Home Office statutory scheme).
- Tenant vulnerability information where it is relevant to a maintenance response or to comply with the landlord's statutory duties (e.g. health-related access requirements). Handled under UK GDPR Art. 9(2)(b) (employment / social-protection law) or Art. 9(2)(g) (substantial public interest, where applicable).

3. How we use your data (purposes and lawful basis)

Purpose	Lawful basis (UK GDPR Art. 6)
Managing a property under a landlord agreement	Performance of a contract (Art. 6(1)(b))
Managing a tenancy under an AST	Performance of a contract (Art. 6(1)(b))
Right-to-rent checks	Legal obligation (Art. 6(1)(c))
Tenancy deposit protection (DPS / mydeposits / TDS)	Legal obligation (Art. 6(1)(c))
Gas safety / EICR / EPC compliance	Legal obligation (Art. 6(1)(c))
HMRC NRL filings, money-laundering checks for landlords	Legal obligation (Art. 6(1)(c))
Replying to website enquiries	Legitimate interests (Art. 6(1)(f))
Marketing communications (Mailchimp -- new property listings, market updates)	Consent (Art. 6(1)(a)) -- withdrawable any time
Defending or pursuing legal claims (rent arrears, dilapidations)	Legitimate interests (Art. 6(1)(f))
Maintenance dispatch (sharing your contact + access details with a contractor)	Performance of a contract (Art. 6(1)(b))

4. Cookies and analytics

The website uses a small number of cookies. The cookie banner on first visit explains your choices. You can change them via the "Cookie preferences" link in the footer.

Cookie	Purpose	Type	Set by
Strictly necessary	Site navigation, security	First-party	CPM
Analytics (if accepted)	Aggregate visitor counts	First-party / Google Analytics	Google
Marketing (if accepted)	Mailchimp campaign click-tracking	Mailchimp	Mailchimp

5. Who we share your data with (processors and downstream services)

Processor	Role	Data shared	Location	Their privacy notice
Microsoft (Microsoft 365 / Exchange / SharePoint)	Email, calendar, document hosting	All inbound + outbound correspondence, documents you send us, scanned ID copies	EU + UK datacentres	https://privacy.microsoft.com
Google (Workspace, Drive, Maps)	Where used for property-location features	Limited to property-listing data	Per Google's regional configuration	https://policies.google.com/privacy
Mailchimp (Intuit)	Email-marketing campaigns	Name, email, engagement metrics	US (UK IDTA + SCCs)	https://mailchimp.com/legal/privacy/
Anthropic (Claude AI)	Drafting tenant + landlord correspondence, classifying enquiries, summarising long email threads -- under human-in-the-loop (see AI Policy)	The text content of items submitted to the AI	US (UK IDTA + SCCs); zero-retention API path used	https://www.anthropic.com/legal/privacy
ElevenLabs	Voice synthesis (occasional use for accessibility-friendly recorded messages)	The text submitted for synthesis	US (UK IDTA + SCCs)	https://elevenlabs.io/privacy-policy
StackCP (20i / Easyhost)	Web-site hosting	Server logs, contact-form submissions	UK datacentres	https://www.20i.com/legal/privacy-policy
Tenancy deposit scheme (e.g. DPS / mydeposits / TDS, as nominated per AST)	Statutory deposit protection	Tenant + landlord + property + deposit data, as required by the scheme	UK	Scheme's own privacy notice

Processor	Role	Data shared	Location	Their privacy notice
Referencing provider (e.g. HomeLet / Goodlord / Canopy, named on the application)	Tenant referencing	Tenant identity + employment + credit history data	UK	Provider's own privacy notice
Gas-safe + electrical contractors	Statutory safety inspections	Property address, tenant access contact	UK	Contractor's own notice
HMRC	Statutory tax reporting; NRL scheme for overseas landlords	As required by tax law	UK	https://www.gov.uk/government/organisations/hm-revenue-customs/about/personal-information-charter
Local authority (Cumberland Council)	Statutory selective licensing where applicable	Property + landlord + tenant data, as required	UK	Council's own privacy notice
Right-to-rent share-code service (UK Home Office)	Statutory tenant right-to-rent check	Tenant identifying data	UK	https://www.gov.uk/government/organisations/uk-visas-and-immigration/about/personal-information-charter
Our accountants	Bookkeeping, year-end accounts	Invoice + payment data	UK	Their own privacy notice on request
Bank / payment provider	Rent collection and disbursement	Name, account references, payment amounts	UK	Bank's own notice
GitHub (Microsoft)	Internal record of property data schema only -- not tenant or landlord personal data	None	--	--

International transfers

Where personal data leaves the UK to a country not subject to a UK adequacy decision, we rely on the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the Standard Contractual Clauses, plus a transfer risk assessment.

6. How long we keep your data

Category	Retention
Active tenancy records	Duration of tenancy + 6 years (legal limitation period)
Right-to-rent evidence	Duration of tenancy + 12 months (Home Office requirement)
Tenancy deposit records	Until the deposit is returned + 6 years
Gas / electrical certificates	Property life + 6 years from change of ownership
Landlord agreements	Duration of engagement + 6 years
Invoicing + accounting	6 years from end of tax year (HMRC)
Website enquiries	24 months from last contact
Marketing-list subscribers	Until consent withdrawn or 24 months disengagement
Server logs	90 days
CCTV at managed properties (where present and notified)	30 days, unless retained for an incident
Backups	Rotated 30/90/365 days, encrypted

7. Your rights

Under UK GDPR you have the right to access, rectify, erase, restrict, port, object, or withdraw consent at any time. To exercise any right, email **DPO@carlislepropertymanagement.co.uk**. We will respond within one calendar month.

Some rights are limited where we have a statutory duty to retain data (right-to-rent evidence, deposit-scheme records, accounting records).

You also have the right to complain to the **Information Commissioner's Office** at <https://ico.org.uk> or 0303 123 1113.

8. Security

Standard measures include MFA on all admin and client-facing systems, full-disk encryption on devices, encrypted backups, role-based access control, and logging with periodic review. Right-to-rent evidence and deposit-scheme submissions are handled per the statutory codes.

If we become aware of a personal-data breach likely to result in a risk to your rights, we will notify the ICO within 72 hours and, where the risk is high, notify affected individuals.

9. Automated decision-making and profiling

We do not make decisions about you that have legal or similarly significant effects (such as accepting or rejecting a tenancy application) using solely automated means. Referencing decisions involve the referencing provider's processes; the final tenancy decision is made by a human at CPM and the landlord.

AI tools are used to *assist* drafting and triage of correspondence, under human-in-the-loop oversight. See the separate **AI Policy**.

10. Children's data

Where tenants are accompanied by children, we collect names and dates of birth only where required for tenancy records or schools-related communications. We do not market to children.

11. CCTV and recorded communications

Where a managed property has CCTV and we have been informed of it, we will signpost that to enquirers via the listing. Telephone calls to our office are not routinely recorded; where recorded for training purposes, we tell you at the start of the call.

12. Changes to this policy

We will update this policy when our processing or processor list materially changes. The current version is dated at the top.

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