

CLEARKEY PROPERTY SERVICES LTD

PRIVACY POLICY

Version: 1.0 | **Effective Date:** 7 June 2026

Company No. 17004197 | Registered office: 124 City Road, London, EC1V 2NX Contact:
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1. Who we are

ClearKey Property Services Ltd (“**ClearKey**”, “**we**”, “**us**”) provides B2B property maintenance coordination for letting agents and property managers. We are registered with the Information Commissioner’s Office (ICO). This policy explains how we handle personal data through our website, our Portal (app.clearkeyproperty.co.uk), and our services.

2. Our role (Controller and Processor)

We act in two capacities:

- **Controller** for personal data relating to our own business contacts, agent and contractor account users, and our contractors — meaning we decide how and why that data is processed.
- **Processor** for personal data relating to tenants/occupiers that a letting agent (the Controller) makes available to us so we can deliver maintenance services. For that data we act on the agent’s instructions under a data processing agreement, and the agent’s own privacy notice governs its use.

3. The personal data we collect

Depending on your relationship with us, we may process:

- **Agent / account users:** name, business name, work contact details, account credentials, and Portal usage data.
- **Contractors:** name, contact details, trade and coverage, qualifications/registrations (e.g., Gas Safe, NICEIC), insurance details, bank/payment details, CIS information (e.g., UTR), and job history.
- **Tenants / occupiers (as Processor, on behalf of agents):** name, contact details, Property address, access details/codes, and communications.
- **Job and operational data:** issue descriptions, before/after photos and video, completion notes, times on site, and related communications via SMS, WhatsApp and email.
- **Payment data:** Direct Debit mandate and payment information processed through GoCardless and our accounting system.
- **Website/Portal data:** device and usage information and limited cookies necessary for the service to function.

4. How and why we use it (lawful bases)

- To provide, coordinate and invoice our services — **performance of a contract** and our **legitimate interests** in operating the business.
- To communicate about jobs, schedules and completions — **contract / legitimate interests**.
- To meet legal, tax, CIS, health & safety and compliance obligations — **legal obligation**.

- To maintain security, prevent fraud, and resolve disputes — **legitimate interests**.
- Where we rely on consent (for example, certain optional communications), you may withdraw it at any time.

We do not use tenant photographs or job data for any purpose other than delivering and evidencing the services, and we do not sell personal data.

5. Who we share it with

We share personal data with service providers (sub-processors and suppliers) only as needed to run the service:

- **Airtable** — operational data records
- **Twilio** — SMS and WhatsApp messaging
- **Xero** — invoicing and accounting
- **Resend** — transactional email
- **Google (Workspace / Drive / Gmail)** — document storage and email
- **Slack** — internal operational alerts
- **GoCardless** — Direct Debit payments
- **Anthropic (Claude)** — AI processing of job text and photos to produce summaries and triage
- **Vercel / Railway** — application hosting

We may also share data with professional advisers, insurers, and authorities where required by law.

6. International transfers

Some of our service providers are located outside the UK (including the United States). Where personal data is transferred outside the UK, we ensure an appropriate safeguard is in place, such as the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses.

7. How long we keep it

We keep personal data only as long as necessary for the purposes above and to meet legal, tax and insurance obligations. Tenant personal data processed on behalf of an agent is deleted or returned in line with our agreement with that agent. Where we are the Controller, retention periods reflect the nature of the data and applicable legal requirements.

8. Security

We use appropriate technical and organisational measures to protect personal data, including access controls, data isolation between accounts, encryption in transit, and limiting access to those who need it. Contractors are required to keep tenant data and access details confidential and secure.

9. Your rights

Subject to UK Data Protection Law, you have the right to access your personal data; to rectify inaccurate data; to erase data; to restrict or object to processing; to data portability; and to withdraw consent where processing is based on consent. To exercise these rights, contact compliance@clearkeyproperty.co.uk.

If you are a tenant/occupier, requests about your data are usually directed to your letting agent (the Controller); we will assist the agent in responding.

10. Complaints

If you have a concern about how we handle your personal data, please contact us first at compliance@clearkeyproperty.co.uk. You also have the right to complain to the Information Commissioner's Office (ICO) at ico.org.uk.

11. Cookies

Our website and Portal use only the cookies necessary for the service to function (for example, to keep you signed in). We do not use advertising cookies.

12. Changes to this policy

We may update this policy from time to time. The version and effective date above indicate the current version, and material changes will be notified through the Portal or by email where appropriate.

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