PRIVACY POLICY

David Coleman & Company
Website: www.davidcoleman.uk.com
Last updated: 26 November 2026

1. Introduction

David Coleman Limited, trading as David Coleman & Company ("we", "us" or "our"), is committed to protecting your privacy and ensuring that your personal information is handled securely and responsibly.

This Privacy Policy explains how we collect, use, store and protect personal information when you visit our website, contact us, use our services or make payments through our online payment facilities.

Personal information (or personal data) is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

We process personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, as amended including by the Data (Use and Access) Act 2025, and other applicable UK data protection and privacy legislation.

2. Who we are

The organisation responsible for processing your personal information is **David Coleman Limited** Trading as David Coleman & Company, registered in England under company number 10103513.

Address: First Floor Rear
1882 Pershore Road
Kings Norton

Birmingham
B30 3AS

Telephone: 0121 655 0998
Email: enquiries@davidcoleman.uk.com
Website: www.davidcoleman.uk.com

For the purposes of data protection legislation, David Coleman Limited is the data controller in respect of the personal information it collects and processes, unless otherwise stated.

David Coleman Limited, T/a David Coleman & Company is an appointed representative of Your Company Matters Limited which is authorised and regulated by the Financial Conduct Authority (FCA) in respect of insurance distribution activities.

3. What personal information we collect

Depending on how you interact with us, we may collect and process the following categories of personal information:

Personal identification information

- Full name and title.
- Residential or correspondence address.
- Email address.
- Telephone number.

Property-related information

- Property addresses and ownership details.
- Leasehold and freehold information.
- Details of property management arrangements.
- Information relating to lease extensions and freehold purchases.
- Correspondence relating to properties, residents and management companies.

Financial information

- Service charge and ground rent account information.
- Payment records and transaction references.
- Invoices and account balances.
- Relevant banking or payment information where required to administer client accounts.

We do not intend to collect or retain full payment card details through our website where payments are processed by an external payment provider.

Communication information

- Emails, telephone enquiries and correspondence.
- Information submitted through website contact forms.
- Complaints, requests and feedback.
- Information provided when requesting quotations or tender information.

Technical information

When you visit our website, certain technical information may be collected automatically, including:

- IP address.
- Browser type and version.
- Device and operating system information.
- Website usage information.
- Pages visited and approximate visit duration.

4. How we collect your information

We may collect personal information through:

- Contact forms and enquiries submitted through our website.
- Telephone calls, emails and written correspondence.

- Instructions provided by clients, freeholders, leaseholders and management companies.
- Property management and leasehold administration activities.
- Payment facilities and financial transactions.
- Third-party professional advisers and service providers, where appropriate.
- Publicly available property and company records.
- Website cookies and similar technologies.

We only collect information that is relevant and reasonably necessary for our business activities and legal obligations.

5. How we use your personal information

We may use your personal information for the following purposes:

- Responding to enquiries and providing requested information.
- Providing property management services.
- Managing residential developments and communal areas.
- Administering service charges, ground rents and other property-related payments.
- Managing lease extensions and freehold acquisitions.
- Communicating with freeholders, leaseholders, residents and management companies.
- Processing and administering financial transactions.
- Maintaining accurate client and property records.
- Managing complaints and resolving disputes.
- Meeting regulatory, legal and professional obligations.
- Maintaining the security and functionality of our website.
- Improving our services and website experience.

We will not use your personal information for purposes that are incompatible with the reasons for which it was collected without providing appropriate information and, where required, obtaining your consent.

6. Our lawful basis for processing information

Under UK data protection legislation, we must have a lawful basis for processing personal information. Depending on the circumstances, we rely on the following lawful bases:

Contractual necessity

Where processing is necessary to enter into or perform a contract with you, including providing property management services and administering client instructions.

Legal obligation

Where we are required to process information to comply with legal, regulatory, accounting or reporting obligations.

Legitimate interests

Where processing is necessary for our legitimate business interests, provided those interests do not override your fundamental rights and freedoms.

This may include responding to enquiries, maintaining business records, managing properties, preventing fraud and protecting our business interests.

Consent

Where you have given consent for a specific purpose, such as receiving certain marketing communications or accepting non-essential cookies.

You may withdraw your consent at any time.

How the lawful bases apply to our activities

Enquiries and quotations: we use identity, contact and correspondence information to answer enquiries and prepare requested quotations. The basis is taking steps at your request before entering a contract with you, or our legitimate interest in responding to other enquiries and communicating about our services.

Property management and client instructions: we use relevant identity, contact, property, correspondence and account information to deliver the services described in Section 5. We rely on contractual necessity where the processing is necessary for our contract with you. Where you are not a party to that contract, we rely on our legitimate interests, or those of our clients, in administering properties, maintaining records and communicating with owners, residents and authorised representatives, subject to your rights.

Payments and accounts: we use payment records, transaction references, invoices, balances and relevant identity and property references to administer payments and client accounts. We rely on contractual necessity where this is necessary for our contract with you, our legitimate interests in allocating and reconciling payments where you are not a contracting party, and legal obligation where financial records must be kept by law.

Complaints and disputes: we use relevant identity, contact, correspondence, property and transaction information for our legitimate interests in investigating concerns, resolving disputes and establishing, exercising or defending legal claims. Legal obligation applies where handling or retaining information is required by law.

Legal and regulatory compliance: we use the information needed to meet applicable legal requirements on the basis of legal obligation. Professional or contractual requirements that are not themselves legal obligations are assessed under the appropriate alternative basis, including legitimate interests where applicable.

Website operation and improvement: we use relevant technical and usage information for our legitimate interests in maintaining a secure, functioning website and improving its services. Consent applies where required for cookies or similar technologies; Section 9 explains our approach.

Marketing: we use relevant identity and contact information with your consent where required, or on the basis of our legitimate interest in promoting our services where the law permits this. PECR requirements apply in addition to the UK GDPR basis. Section 14 explains how to opt out.

We assess legitimate interests against the impact on individuals and do not rely on that basis where your interests or fundamental rights and freedoms

override the interests pursued. You can contact us using Section 18 to ask about the basis for processing your information.

7. Sharing your personal information

We do not sell, rent or trade your personal information to third parties.

However, we may share relevant information where necessary with:

- Freeholders and property owners.
- Residents' management companies and their directors.
- Leaseholders and authorised representatives.
- Contractors and maintenance providers.
- Accountants, auditors and professional advisers.
- Solicitors, barristers and other legal representatives.
- Banks and payment processing providers, including Stripe for the payments described in Section 8.
- Regulatory authorities and professional bodies, including the appropriate authorities where legally required.
- Courts, tribunals and dispute resolution organisations.
- Website hosting, IT support and other technology providers.

We only share information where there is a legitimate reason, an appropriate lawful basis and, where applicable, suitable contractual and security arrangements.

Third-party organisations receiving personal information may have their own privacy policies and data protection responsibilities.

8. Online payments

Our website provides access to online payment facilities via Stripe for service charges, ground rent and other relevant fees.

When you make one of these payments, Stripe processes the transaction. Personal information used in connection with the payment may include your name, contact and billing details, payment-method information, payment amount and the relevant service or transaction reference.

Stripe processes personal information in accordance with its role in the relevant activity, which may be as a data processor and/or an independent data controller. Further information about Stripe's use of personal information, your rights and international transfers is available in Stripe's Privacy Policy.

We may receive transaction information, such as payment confirmation, amount paid, date and transaction reference, to enable us to administer your account and maintain appropriate financial records.

We do not intend to store full debit or credit card details on our website.

9. Cookies and website technologies

Cookies and similar technologies can store information on your device or access information already stored there. The privacy rules apply to similar technologies as well as cookies, whether or not the information is personal data. Where personal data is involved, the UK GDPR also applies.

Cookies are small text files stored on your device.

They may be used for:

- Essential website functionality.
- Security and performance.
- Remembering user preferences.
- Website analytics and visitor statistics, where enabled.

Where cookies or similar technologies are not strictly necessary, we will obtain your consent before using them, in accordance with applicable privacy legislation.

You can manage your cookie preferences through the website's cookie settings, where available, or through your browser settings.

Disabling certain cookies may affect website functionality.

Further information about the cookies used on our website should be provided in our separate Cookie Policy, which can be found here.

10. How long we retain your information

We retain personal information only for as long as reasonably necessary to fulfil the purposes for which it was collected, including satisfying legal, regulatory, accounting and reporting requirements.

Retention depends on the type of information, the purpose for which it is held, whether the matter remains active, applicable statutory record-keeping requirements, and the time for which the information is reasonably needed to deal with complaints, disputes or legal claims. We do not retain all information indefinitely simply because a business relationship once existed.

For example:

- Client and property management records may be retained for the duration of the relevant management relationship and an appropriate period afterwards.
- Financial and accounting records may be retained for the periods required by applicable legislation.
- Correspondence and enquiry records may be retained for as long as necessary to deal with the enquiry or any resulting business relationship.
- Website technical and cookie information will be retained in accordance with its purpose and applicable retention requirements.

When information is no longer required, it will be securely deleted or anonymised where appropriate.

11. How we protect your information

We take appropriate technical and organisational measures to protect personal information against accidental loss, unauthorised access, alteration, disclosure or destruction.

These measures may include:

- Restricted access to personal information.
- Secure storage and record management.
- Password protection and access controls.
- Appropriate security measures for our IT systems.
- Use of reputable third-party service providers.
- Appropriate staff confidentiality and data protection procedures.

Access to personal information is limited to people who need it for their work and is subject to appropriate confidentiality requirements. If a personal data breach occurs, we will assess it, take appropriate steps to address it, and notify the ICO and affected individuals where legally required.

Although we take reasonable steps to protect your information, no method of electronic transmission or storage is completely secure.

12. Transfers of personal information outside the UK

We generally aim to use service providers and systems that process personal information within the United Kingdom.

Where personal information is transferred outside the UK, we will ensure that appropriate safeguards are in place in accordance with applicable data protection legislation.

These may include UK adequacy regulations, the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, as appropriate.

You can contact us using Section 18 for information about relevant overseas transfers and to request a copy of the applicable safeguards, subject to necessary redactions to protect confidential information.

13. Your data protection rights

Under applicable data protection legislation, you may have the following rights:

Right of access

You can request a copy of the personal information we hold about you.

Right to rectification

You can ask us to correct inaccurate or incomplete personal information.

Right to erasure

You can request the deletion of your personal information in certain circumstances.

Right to restrict processing

You can ask us to restrict how we use your information in certain circumstances.

Right to data portability

Where the legal conditions apply, you can obtain personal information you have provided to us in a structured, commonly used and machine-readable format and ask us to transmit it to another controller where technically feasible. This right applies to relevant automated processing based on consent or a contract.

Right to object

You have an absolute right to object to processing for direct marketing, including related profiling; we will stop using your information for that purpose. You can also object, on grounds relating to your particular situation, to processing based on legitimate interests. In that case, we will stop unless we demonstrate compelling legitimate grounds overriding your interests, rights and freedoms, or the processing is needed for legal claims.

Right to withdraw consent

Where we rely on consent, you can withdraw it at any time using the relevant preference or unsubscribe control, or by contacting us using Section 18. Withdrawing consent does not affect the lawfulness of processing before withdrawal. Withdrawal must be as easy as giving consent.

These rights are subject to certain legal conditions and exemptions. For example, we may be required to retain certain financial or property management records to meet our legal and regulatory obligations.

To exercise any of these rights, please contact us using the details provided in this policy.

Making a subject access request

You can ask whether we process your personal information, request a copy and obtain the accompanying information about its use. You may make a request verbally or in writing, including by telephone, email or post using Section 18. You do not need to use a particular form or legal terminology. An authorised representative can make a request on your behalf.

We respond without undue delay and normally within one calendar month. Where necessary because of complexity or the number of requests, we may extend this by up to two further months and will explain the extension and reasons within the initial response period. Where reasonably necessary, we may request proportionate information to verify identity or a representative's authority. Any permitted adjustment to the response period, including for clarification where the law allows, will be explained to you.

Requests are normally free of charge. Where the law permits, including for manifestly unfounded or excessive requests, we may charge a reasonable fee or refuse to act. We will explain any such decision and your options for complaining. Please tell us if you need assistance or an accessible response format.

Please let us know if personal information we hold about you becomes inaccurate or out of date.

14. Direct marketing

We may occasionally send relevant business communications where permitted by law.

We will not send unsolicited electronic marketing where consent or another applicable legal permission is required but has not been obtained.

You can opt out of marketing communications at any time by contacting us or using the unsubscribe facility provided in the communication.

Please note that opting out of marketing will not prevent us from sending essential service-related or administrative communications.

15. Links to external websites

Our website may contain links to external websites, online payment services or third-party resources.

We are not responsible for the privacy practices, security or content of websites operated by other organisations.

We recommend reviewing the relevant privacy policies before providing personal information to any third-party website.

16. Children's privacy

Our website and services are intended primarily for adults, property owners, leaseholders, freeholders and business representatives.

We do not knowingly collect personal information from children unless this is necessary and lawful in connection with our services.

17. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in legislation, regulatory guidance, our business activities or the way we process personal information.

Any updated version will be published on our website with a revised last updated date.

We encourage visitors to review this policy periodically.

Using our website does not, by itself, mean you consent to processing that requires consent. Where we need your consent, we will request it separately. Where required by law, we will provide further privacy information before using your information for a new purpose.

18. Contacting us

If you have any questions about this Privacy Policy, how we process your personal information or wish to exercise your data protection rights, please contact us:

Data Protection Enquiries
David Coleman Limited
Trading as David Coleman & Company

First Floor Rear
1882 Pershore Road
Kings Norton
Birmingham
B30 3AS

Telephone: 0121 655 0998
Email: enquiries@davidcoleman.uk.com

19. Data protection complaints and the ICO

You have the right to complain to us about how we collect, use, disclose, retain or otherwise handle your personal information, including our response to a request to exercise your rights.

If you are unhappy with how we have handled your personal information, we would appreciate the opportunity to address your concerns in the first instance. Please contact Data Protection Enquiries using the email, telephone or postal details in Section 18. You do not need to use a particular form or refer to data protection legislation.

We will acknowledge your complaint within 30 days of receiving it. Without undue delay, we will make appropriate enquiries, investigate the issues, keep you informed as appropriate and tell you the outcome. Where further action is needed, we will explain the steps we will take.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's independent data protection regulator. Information about how to raise a concern is available through the ICO website. This section concerns

personal-data complaints; it does not replace any applicable service, professional or financial-services complaints procedure.

Website: https://ico.org.uk/
Telephone: 0303 123 1113

End of Privacy Policy