

# Our Privacy Policy

This privacy notice sets out how we will process personal data we collect from or about you, or which you provide to us. Please read this notice carefully to understand why data is being collected and what we do with that data.

Our website and services may contain links to independent websites which are not provided by us. Such independent sites are not under our control, and we are not responsible for and have not checked and approved their content or their privacy policies.

We may change the privacy notice from time to time by amending this page. Where we amend our policy, we will advise you that the Policy has been updated.

For the purpose of the Data Protection legislation, we are working on the UK version of the General Data Protection Regulation EU 2016/679 which were introduced in May 2018 the Data Protection Act (DA) 2018.

## **What type of information will we collect from you?**

There are many reasons why you may be contacting us and as such the information we obtain will differ depending on the purpose for us requesting or your providing personal data. This typically could include:

- If you are interested in buying or renting a property
- Have a property to sell or Let
- If you work for us, or have worked for us
- If you are interested in working for us
- If you are a contractor

The personal information we collect from you will differ depending on the purpose but could include the some or all of following:

- Your name, address, email, and telephone numbers
- Documentation to fulfil our obligations under Money Laundering Regulations and Immigration Act Regulations
- Personal details of your next of Kin
- Your bank details
- Information any connected person with our organisation which could give rise to a conflict-of-interest disclosure
- Your Salary information and past employment history
- Any relevant information on access requirements, health, or disability to ensure that have the necessary information in order to help find any property you may be interested in buying or renting

## **What are we going to do with your information?**

We will hold and use personal information about you in the following ways:

- In order to fulfil our obligations to you when providing you with our services or information you have requested
- To share your information with others where necessary to fulfil our property services for you or where acting as agent for a third party on your behalf
- To comply with our statutory and regulatory obligations, including [verifying your identity, prevention of fraud and money laundering and to assess your credit worthiness]
- Communicate with you during the course of providing our services, for example with your enquiries and requests.
- Statistical purposes so we can analyse figures to help us manage our business and plan strategically for the future.
- To provide you, or to enable [third parties] to provide you, with information about goods or services we feel may interest you, where you have provided permission for us to do so or, if you are an existing customer only, where we choose to contact you by electronic means (including e-mail or SMS) with information about our own goods and services similar to those which you have already obtained from us or negotiated to obtain from us . For those marketing messages you can unsubscribe at any time
- To notify you about changes to our service.
- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- Use the information in accordance with any contract of employment or similar

## **On what basis can we process your information?**

The legal grounds under data protection legislation for processing your personal data are as follows:

- It is necessary for the performance of a contract to which you are a party, or to take steps prior to entering into a contract with you, for us to provide you with our products and services.
- You have given us explicit consent to the processing of your personal data for one or more specific purposes, namely 1) where you have given us consent to receive electronic marketing by us and/or 2) to process your Special Category Personal Data described above. You do not need to provide us with marketing consent in order to receive our services.
- It is necessary for the purposes of our legitimate interests, except where our interests are overridden by the interests, rights, or freedoms of affected individuals (such as you). To determine this, we

shall consider a number of factors, such as what you were told at the time you provided your data, what your expectations are about the processing of the data, the nature of the data, and the impact of the processing on you. Our legitimate interests include processing necessary to improve and to promote our services and product and to better understand our customers' interests and knowledge of the property market and to administer the technical aspects of our service and products.

- Where we need to comply with a legal obligation; or in rare circumstances:
  - Where we need to protect your interests (or someone else's interests); and/or
  - Where it is needed in the public interest or for official purposes

### **How long we keep your data for**

We will retain your personal data for different periods depending on the service you have chosen to use us for. For all property related transactions, we will retain personal data for 6 years after the business relationship comes to an end; For personal data obtained in order to comply with Money Laundering Regulations then we will retain these for a Period of 5 years after the business relationship ends; Personal data for employment purposes will be retained for 6 years. There may be times in which a longer period than those stated will be required, i.e. where we are under regulatory or statutory duties to hold your data for a longer period or need to retain it in the event of a legal claim or complaint.

We will also disclose your personal information to third parties:

- If our company or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **Security of your Data**

Your data will be held on secure servers within the European Economic Area ("EEA") with all reasonable technological and operation measures put in place to safeguard it from unauthorised access. Where possible any identifiable information will be encrypted or minimised.

If we have given you a username and password which enables you to access certain parts of your matter on our systems, you are responsible for keeping it confidential. Please do not share it with anyone.

## **Yours Rights**

### How you can access and update your information

You have a right to request a copy of the personal information we hold about you, known as a data subject access request. You also have the right to request that information we hold about you which may be incorrect, or which has been changed since you first told us, is updated or removed. These requests can be sent to our Data Protection Officer whose contact details were provided at the beginning of this Policy. Any subject access request information will be processed within 30 days unless we agree otherwise with you.

### How you can request erasure of your data

You can ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where you have withdrawn consent for us to process it (as explained below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

### How you can withdraw your consent

You have the right at any time to withdraw any consent you have given us to process your personal data. Please note if you withdraw your consent it will not affect the lawfulness of any processing of your personal data we have carried out before you withdrew your consent. Should you wish to do so you can change your consent preferences at any time contact the data protection officer at detailed at the beginning of this privacy notice.

### How you can restrict or object to us using your data

You can ask us to suspend the way in which we are using your information in certain scenarios, or object to our processing your data where we are relying on a legitimate interest ground (or those of a third party) and you feel it impacts on your fundamental rights and freedoms, or where we are processing your personal data for direct marketing purposes. In some cases where you object, we may demonstrate that we have compelling

legitimate grounds to process your information which override your rights and freedoms.

Please note that if you want us to restrict or stop processing your data this may impact on our ability to provide our services. Depending on the extent of your request we may be unable to continue providing you with our service.

Moving your information to another organisation

In the event that we process your data by automated means where you have either provided us with consent for us to use your information or where we used the information to perform a contract with you, you have the right to request that we send to you or to another organisation, a copy of the personal data we hold about you, for example when you are dealing with a different service provider.

### **Complaints about the use of your personal data**

If you wish to raise a complaint on how we have managed or processed your personal data, you can contact us to request the matter investigated. In the first instance please write/email our data protection office whose contact information is at the beginning of this privacy notice.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the UK data protection regulator, the Information Commissioner's Office. Further details can be found at [www.ico.org.uk](http://www.ico.org.uk) or [0303 123 1113](tel:03031231113).

### **Our website and Cookies**

Usage information about your visits to our website (which enable our website to remember information about you and your preferences) and use of our site. This may include information about your visit, including [the full Uniform Resource Locators (URL),] [clicks through to and from our site (including date and time),] [products you viewed or searched for] [page response times,] [download errors,] [length of visits to certain pages,] [page interaction information (such as scrolling, clicks, and mouse-overs),] [methods used to browse away from the page, and any phone number used to call our customer service number.

Other technical information, including what devices you use to connect to our App, device location data where this function is not disabled by you on your device, [the Internet protocol (IP) address used to connect your computer to the Internet,] [your login information,] [browser type and version,] [time zone setting,] [browser plug-in types and versions,] [operating system and platform.

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