We comply with The GDPR Principles and are members of the ICO and abide by the rules of the General Data Protection Regulation (GDPR) upheld by the Information Commissioner's Officer (ICO).

What type of personal information do we collect about you? We may collect the following information:

Your name, email address, telephone number and property address when you register to arrange a viewing, register for property alerts, request a valuation or lettings consultation, book a mortgage appointment or submit an enquiry;

Details included on any enquiry you submit in relation to property insurance and any subsequent policies that are issued;

Cookie data which relates to your use of our website;

Data sent from your browser to our server which may include:

The time, date and duration of your visit to our website;

The site from which you have come (the referral URL);

The pages visited on our website and your IP address.

### If you are a tenant or prospective tenant:

Your name, address, email address and telephone numbers

Your date of birth, nationality, marital status, and tax status

Your bank account details, income/expenditure details and your tax number;

we are required by law to carry out right to rent checks which will include the holding of identity documents prior to commencement of tenancy

We will hold details including your marital status, employment details, national insurance number, nationality, residential status, bank details and credit history when carrying out referencing and credit checks and we will store details of the final results of these checks.

Your contact details, move in and move out date, utility meter serial number and meter readings if you are a landlord or tenant of a property whether a let only or managed service is offered.

Details of any debt that you owe to us.

references relating to you, or information required to prepare a reference for you where you are a tenant; and

If you are a prospective or existing tenant, we will hold:

Your title, names, contact details, preferences for delivery methods, sex, civil/marital status, date of birth, nationality, occupation, employment and remuneration information (including salary/bonus schemes/overtime/sick pay/ other benefits) and employment history, bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents, confirmation of whether or not you smoke, credit reference checks and details of the type of mortgage.

Your move in and move out date and details of the deposit you have paid where you are a tenant when registering or releasing any deposit from a deposit protection scheme;

# If you are a guarantor or prospective guarantor:

your name, address, email address and telephone numbers, date of birth

Your bank account details, income/expenditure details and your tax number;

evidence that you are a property owner in the UK or evidence of residency in a property. a copy of photographic identification

# If you are a landlord or prospective landlord:

Your name, address, email address and telephone numbers

# If you enter into a Lettings Agreement with us (whether Let only or Managed agreement):

Where appropriate your date of birth, nationality, marital status, and tax status. Financial or other identifiers including your bank account details, and your tax number;

Evidence that you have the right to let a property where you are a landlord and instruct us to assist you with letting a property;

Details of any mortgage or insurance, licensing documentation and service contracts which you have in place in relation to a property you wish to let where you are a landlord and we are providing you with letting services where we deem appropriate.

Details relating to your property including photographs, floor plans, energy performance certificate, property description and survey results when you engage us to market a property for you;

Photographs of your property when we market your property for sale or to let, prepare an inspection report on the condition of your property, or when we prepare an inventory to record the condition of your property at the start or end of a tenancy;

Your contact details, move in and move out date, utility meter serial number and meter readings prior to the tenant moving into the property and at determination of a tenancy.

#### If you are a Vendor or Purchaser:

Proof of available funds to pay any deposit required when you wish to make an offer to buy a property and evidence of the source of funds you will be using to buy a property, including for example, a copy of your bank statement or an agreement in principle from your mortgage provider;

Your name, address, email address and telephone numbers where appropriate your date of birth, nationality, marital status, and tax status.

Financial or other identifiers including your bank account details, income/expenditure details and your tax number, details of your mortgage arrangements, confirmation of how long you have owned the property and details of the source of monies invested in the property when you register to sell;

Details relating to your property including photographs, floor plans, energy performance certificate, property description and survey results when you engage us to market a property for you.

Photographs of your property when we market your property for sale or to let, prepare an inspection report on the condition of your property, or when we prepare an inventory to record the condition of your property at the start or end of a tenancy;

The majority of the personal information which we collect will have been voluntarily provided by you, however we may also obtain your personal data from other sources including:

Third parties including credit reference agencies, law enforcement/regulatory bodies, companies providing commercially available databases, social networks (such as Facebook), introducer companies who have referred you to us for the delivery of services, your employer, your solicitor, trustees or your attorney or any other third party where deemed necessary. We may also use information from the electoral roll and HM Land Registry.

# How we use the information we collect from you. Your information will be used by us in connection with the following:

# Providing You with Services:

To provide you with the estate agency services which you have asked us to provide, including but not limited to:

Advice and help in selling your property

Advice on finding a property to purchase

Valuing your property for sale or rent

Processing the receipt and payment of rent, maintenance and tax for you if a property is being let

Arranging an energy performance certificate or home report inspection for you

Arranging an inventory check or to prepare a report on the condition of a property if it is being let

Ensuring that utility companies and local authorities are able to contact you for billing purposes when you move in to or out of a property

Protecting a tenant's deposit by registering it with a deposit protection scheme

Deducting payment from you for the services which we provide

Arranging to carry out viewings for prospective tenants or purchasers

Carrying out tenant referencing and credit checks to assess if you are creditworthy before you move into a property. To carry out such checks, your personal information may be shared with credit referencing companies, please refer to the Disclosure of Information section below for further details;

# Wherever we collect or use your personal information, we will make sure we do this for a valid legal reason. This will be for at least one of the following purposes:

It is necessary or a legal requirement to fulfil the terms of our contract with you and offer our services to you – if you have entered into a contract with us to sell or let a property for you;

To fulfil our obligationss we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities

If you would like to know more about the way in which we use personal information you can contact us at any time.

#### Your rights to your personal information

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information.

#### Right to access to the personal information we hold about you

You have a right to request that we provide you with a copy of personal information that we hold about you and you have the right to be informed of; (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; and (c) the entities or categories of entities to whom your personal information may be transferred.

# Right to rectify or erase the personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

# You can also request that we erase your personal information in the following circumstances:

Where it is no longer needed for the purposes for which it was collected.

Where you have withdrawn your consent (where the data processing was based on consent); or following a successful right to object (see right to object); or

where it has been processed unlawfully; or

to comply with a legal obligation to which we are subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

For compliance with a legal obligation; or

For the establishment, exercise or defence of legal claims.

# Right to restrict the processing of your personal information. You can ask us to restrict the processing of your personal information, but only where:

Its accuracy is contested, to allow us to verify its accuracy

The processing is unlawful, but you do not want it erased; or

It is no longer needed for the purposes for which it was collected, but you still need it to establish, exercise or defend legal claims; or

You have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction:

Where we have your consent; or

To establish, exercise or defend legal claims; or

To protect the rights of another natural or legal person.

#### Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

The processing is based on your consent or on the performance of a contract with you; and

The processing is carried out by automated means.

### Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

#### Right to object to how we use your personal information for direct marketing purposes

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we do not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

# Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

### Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your local supervisory authority (the contact details for which are set out in the Complaints section of this Privacy Notice) if you have concerns about how we are processing your personal information

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

#### Data retention

The personal information that you provide will be retained by us in accordance with applicable laws and in compliance with the GDPR. However, we will take reasonable steps to destroy or deidentify personal information we hold if it is no longer needed for the purposes set out above. We will only hold your personal information on our systems for as long as is necessary for the relevant purpose for which it was collected.

#### Disclosure of information

The information you provide to us will be held on our computers and may be accessed by or given to our staff for the purposes set out in this Privacy Notice or for other purposes approved by you. We may also provide your personal information to other companies for the purposes of administering our business.

We may also disclose your information to the third parties listed below for the following purposes:

Service providers who need to know the information in order to provide us or you with a product or service including our approved contractors for the purpose of carrying out maintenance or gas safety checks at your property, surveyors where you or your mortgage provider require a homebuyers or structural survey to be carried out, your conveyancer, mortgage or insurance adviser;

Where you have provided your consent, our insurers for the purpose of discussing your insurance requirements;

Our panel conveyancing firms if you ask us to arrange conveyancing services for you;

Law enforcement bodies and/or other regulatory entities in order to comply with any legal obligation or court order including the police, HMRC and local authorities;

Auction houses where the property you are buying or selling is being sold by auction;

Third parties we work with as part of providing our services and their associated companies and sub-contractors, including (but not limited to) IT administrators, inventory clerks, photographers, utility companies, marketing and transactional communication companies, energy performance certificate companies, companies that facilitate electronic signature of documents and relocation agents;

Referencing companies to check your creditworthiness and to help prevent fraud and money laundering, the check will leave a soft ID footprint on your credit file which should not affect your credit rating;

Social media networks such as Facebook for marketing purposes as explained in the 'use of the information we collect' section of this Privacy Notice;

Debt collection companies to assist us in collecting any monies which you owe to us where payment is overdue;

Our professional advisers, for the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations;

Third parties as necessary in the event of a claim or dispute relating to the use of our services;

If we are providing you with letting services we may share and discuss your personal information to enable us to verify who you are and that the facts that you have told us about yourself are accurate. This includes:

The landlord (We will contact your landlord and ask them to verify the tenancy information you have supplied on your application form. We operate on the principle that you have advised your landlord that we will be contacting them. We will ask for tenancy details such as duration, rent paid and arear details. We will ask if if your landlord would re-let a property to you in the future) It is our obligation to keep the landlord fully informed where we manage a property on their behalf and to allow you to contact each other directly in circumstances where the landlord is managing the property;

DPS for the purpose of providing a tenancy deposit protection scheme;

ARLA Propertymark a professional body responsible for raising professional standards amongst letting agents, where information relating to you is requested by them in order to protect your interests; and

The Property Ombudsman scheme where they are providing an alternative dispute resolution service in connection with the letting services which we are providing.

We may obtain information from other sources such as public records, if required. This is to enable us to verify who you are and that the facts that you have told us about yourself are accurate.

### Security

We employ security measures which aim to protect the information provided by you from access by unauthorised persons and against unlawful processing, accidental loss, destruction or damage. This includes password protected company email accounts that are only accessible by members of staff

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is sent to us.

### Marketing of Our Services to You

To provide you with updates in relation to the property market, in accordance with your preferences;

To provide you with information which we reasonably believe may be relevant to you based on the services we are providing to you including information on mortgages, protection and insurance products and third party and conveyancing services;

To carry out targeted advertising to you on social media websites such as Facebook where you have already shown an interest in our services. This is done through analysing information we collect about your interactions on our website and making this available to social media networks;

# Improving Our Site

To analyse cookie and website usage data to keep improving our website;

To allow us to customise the content which is presented to you based on your likely interests;

### Cookies and tracking

Like many sites and software, we use 'cookies' to enable us to personalise your visits, simplify the signing-in procedure, keep track of your preferences and to track the usage of the Website. Cookies are small pieces of information that are stored in the hard drive of your computer by your browser. Your browser will have the option to prevent sites using cookies (your browser's help screen or manual will tell you how to do this), but please note that this may reduce the functionality of the Website and other Sites.

Like all sites, our servers automatically record 'log files' containing information about the volume and characteristics of the Website traffic e.g. IP address, numbers of pages viewed, length of time spent on site etc. We use log files to build pictures of how the Website and is used that help us to monitor and improve our service. We cannot identify you from your log files.

We use Google AdWords remarketing services to advertise on third party websites (including Google) to previous visitors to our site. It could mean that we advertise to previous visitors who have not yet completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookie to serve ads based on someone's past visits to the our website. Of course, any data collected will be used in accordance with our own privacy policy and Google's privacy policy.

#### Our cookies and how we use them

We use both session and persistent cookies on our website. Like many websites we use cookies to store and then retrieve small bits of information on your computer when you visit. This information is used to make the site work as you expect it to. It is not personally identifiable to you, but it can be used to give you a more personalised web experience. Some of the information stored is put there by other companies whose software we have added to the site, and this can also impact your experience of other websites you may visit after leaving ours. If you continue to use this site without taking action to prevent the storage of this information, you are effectively agreeing to this use. If you want to learn more about the general uses of cookies, including how to stop them being stored by your computer, please visit Cookiepedia – all about cookies.

Below is a list of the different types of cookies used on this site, and an explanation of what they are used for. If you would like any more information, please get in touch.

#### **Strictly Necessary Cookies**

These cookies are necessary for the website to function. They are usually only set in response to actions made by you which amount to a request for services, such as logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Cookies

**PHPSESSID** 

#### **Performance Cookies**

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site.

All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

# **Functionality Cookies**

These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages.

If you do not allow these cookies, then some or all of these services may not function properly.

# **Targeting Cookies**

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites.

They do not store any personally identifiable information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

# **Analytics cookies**

We use [Google Analytics] to analyse the use of our website.

Our analytics service provider generates statistical and other information about website use by means of cookies.

The analytics cookies used by our website have the following names: [\_ga, \_gat, \_\_utma, \_\_utmt, \_\_utmb, \_\_utmc, \_\_utmz and \_\_utmv].

The information generated relating to our website is used to create reports about the use of our website.

Our analytics service provider's privacy policy is available at: http://www.google.com/policies/privacy/

#### Third party websites

Our webite may contain links to other websites. We accept no responsibility or liability for the content of other websites which are not under our strict control, in particular, we are not responsible for the protection and privacy of any information which you provide whilst visiting other websites and such sites are not governed by our Privacy Notice.

#### Special notice if you use our insurance services

This section of the Privacy Notice is only relevant to the extent that we are providing you with our insurance services.

Our insurers are authorised and regulated by the Financial Conduct Authority (FCA). Our insurers are responsible for the quality of the advice that we provide to you in relation to your insurance products, where those products are regulated by the FCA. In the course of doing so, our insurers will process your information, including your Special Data and Criminal Disclosures.

In the course of handling your information and your Special Data/Criminal Disclosures, us and our insurers will:

Record and store your information and your Special Data/Criminal Disclosures on systems that run on secure servers. Your information and your Special Data/Criminal Disclosures will be accessed by authorised employees and consultants within, or engaged, by us or our insurers as necessary for the purposes of supervision, training, quality audits, customer surveys and complaint handling or otherwise to comply with any other legal or regulatory obligation they may have;

Use, and where appropriate transmit, your information and your Special Data/Criminal Disclosures to respond to any request from the FCA, the Financial Ombudsman Service, HMRC, the ICO or any other regulatory, law enforcement or governmental body; and

Need to access and process your information and your Special Data/Criminal Disclosures to deal with enquiries received from mortgage lenders and insurance providers that relate to the service we have provided to you, including the payment of any commission or fees to us that may be linked to the product you have taken out.

Your information and your Special Data/Criminal Disclosures will be retained by us and our insurers either electronically or in paper format for a minimum of six years and possibly for a longer period where this is required to enable us to fulfil our legal and regulatory obligations.