# **PRIVACY POLICY**

This section details personal information collected about you and how it is used if you are a buyer, seller, landlord or occupier of property.

## We will collect.

- Your pronoun, name and address, phone number(s), address(es) and email address(es).
- Financial information, which may include your bank details, payment details and information obtained from credit checks if you are a landlord or occupier.
- Documents provided to evidence your name and or identity (such as your passport, driving licence etc) and proof of address (such as utility bills, bank statements, etc.
- If you are a prospective occupier and have been introduced to a referencing company, any information collected as
  part of a referencing request.
- If you are a prospective occupier, information about your employment, such as your job title, employment history and records (including information on your salary, benefits and earnings, past, present and future).
- Additional information which is relevant to the property you are buying, selling, letting or renting, that is your current home status and living circumstances, your family circumstances
- Information which we have gathered from public sources such as HM Land Registry.
- Information which we have gathered from third party suppliers to confirm your identity and/or ownership of, or interest in, the property for sale or to let.

We will collect information from you when:

- You visit us or we visit you.
- You complete documentation including our terms of business, landlord management information, application for occupation and reference requests.
- You use our website.
- You contact us by email, telephone, Facebook (and other social media channels) and through any other written and verbal communications.
- You request information about our services.
- Third parties assisting with the sales or letting process including solicitors, estate agents, third party referencing companies if you are an occupier and other management companies.
- Publicly available sources, for example Companies House or HM Land Registry and credit reference agencies where
  you are an occupier.
- Third party suppliers used to confirm your identity and/or ownership of, or interest in, the property for sale or to let.

We will use your personal information for a verity of different legitimate purposes, we of course must have "legal grounds" to do so, the following are examples:

- We need to use your personal information to fill out our terms of business and for you to engage us to carry out our services. For example, we need to use your personal information to arrange the letting or sale of your property and to administer all aspects of this service.
- We have a legal and/or regulatory obligation to use your personal information. For example, our regulators and governing bodies obligate us to hold records of dealings with you and HMRC require us to keep certain records.

- We need to use your personal information for a legitimate business purpose, for example to keep a record of all the properties that we have been involved with, to assist with the buying or letting process, to keep all involved parties up to date, to keep business and accounting records accurate, to manage and maintain our business operations and also to develop and improve our products and services. When we use your personal information we will protect your rights to privacy all times.
- We have a legal obligation to comply with anti-money laundering regulations and as such we will use your data to satisfy our obligations, we may also need to process data of individuals who jointly own your property or that may be involved, or benefit from, the transaction (s) we assist you with. We will use third party providers to confirm identities and property ownership.

We always keep your personal information confidential; we will never share it or sell it for commercial purposes, and we will only share it when necessary to conduct legitimate business activities or to satisfy legal or regulatory requirements, some examples of parties that your information could be shared with are:

- Third parties involved in the sale or letting process.
- Solicitors involved in the property transaction and associated transactions (chains).
- Other estate agents (in dealing with chains, although we would likely limit the information shared to your name and address or associated transaction address if different to your home address, your solicitors details and name of mortgage broker/lender).
- Property developers (if for example you were purchasing through them).
- Mortgage and financial advisers.
- Property management companies.
- Contractors (if you were an occupier and a repair or maintenance was necessary)
- A third party assisting with proving your identity for regulatory requirements.
- A referencing company and landlords where you are an occupier and we have introduced you to a particular referencing company.
- Insurers who provide insurance and companies who arrange such insurance.
- Regulatory bodies including, Financial Conduct Authority, Tenancy Deposit Scheme and the Ombudsman Services.
- The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of a crime.
- Debt collection agencies.
- Credit referencing agencies.
- Our third party service providers such as IT suppliers, auditors, lawyers, document management providers, outsourced business management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer or disposal of business.

Your personal information may be shared with your vendor or buyer, landlord or occupier, we shall assume that you consent to this as it is needed for legitimate business purposes, unless you communicate to us that you do not wish for this information to be shared, however, please note that it is highly likely that decisions made about agreeing a sale or let cannot be made without the consideration of this information.

The information shared in this instance is limited to...

- Your name
- Partial or full address
- Lender/finance broker details
- Your associated buying or selling status (es)

# Your Rights...

Under the General Data Protection Regulation, you have a number of important rights free of charge. In summary, those include:

## Transparency

You have the right to be informed about how we use your data. If you think we are doing something with your information that is not covered in this Privacy Notice, you can raise an objection (see below).

## **Access**

You have the right to ask us what personal information we hold about you, and to request a copy, free of charge. Please note we consider that the request is speculative, excessive, or repetitive we are able to charge a reasonable fee. This fee will be based on the administrative cost to us of of providing the information.

# Objection

You can object to us processing your personal data in certain situations. Please note that this right will not apply in all circumstances. For example, where we are processing information because it is necessary for the provision of our services or to satisfy our regulatory requirements and (therefore is required to adhere to the terms of contract with our clients) we will be required to continue process this information.

#### Withdraw consent

In circumstances where we are processing your data based on your consent, you can withdraw this consent at any time. Where our processing is based on your consent and such consent is then withdrawn, we may no longer be able to provide our service to you.

#### Rectification

If you think that the personal data we hold about you is inaccurate or incomplete, you have the right to request that such inaccuracy or incomplete information is rectified.

## **Erasure**

You can ask us to delete your personal data where it is no longer necessary for us to use it, where you have withdrawn consent (if we process based on consent), or where we have a lawful basis for keeping it.

#### Restriction

You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.

# **Appeal**

If you are not satisfied with the way we have dealt with your personal data, please let us know and we will try and resolve your concerns. If you are not satisfied with the outcome, you can make a formal complaint (see how to complain below).

If you would like to exercise any of those rights, please

- Email us at: post@bobparry.info
- Let us know the information to which your request relates, including any account or reference number, if you have them.

For further information on your rights, including circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

### How to complain

We hope that initially we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, which in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/make-a-complaint or by telephone on 0303 123 1113