

# Privacy Policy

## Anderson Reid Estates & Anderson Reid Estates & Investments

### 1. Introduction

Anderson Reid Estates Ltd (Registered company number 7626695) and Anderson Reid Estates & Investments Ltd (Registered company number 10253036) are both registered companies Registered in England with a registered address of 296 Sandbanks Road, Poole, BH14 8HX. Our registered VAT number is 281 1131 41

We are committed to protecting your personal data. This privacy policy gives you detailed information on when and why we collect your personal data, how we use it and how we keep it secure. Please read this policy carefully alongside our Cookie Policy and our Data Retention Policy to understand our views and practices regarding your personal data and how we will treat it.

This document has been prepared to adhere to Data Protection Legislation: the Data Protection Act 1998 and any other applicable laws relating to the processing of personal data including the Privacy and Electronic Communications (EC Directive) Regulations 2003 and all related regulations, regulatory codes of practice, opinions and guidance issued from time to time, including by the Information Commissioner, and in each case any amending, superseding or replacement applicable law including (from and including 25 May 2018, where applicable) the General Data Protection Regulation 2016/679/EU.

### 2. Our responsibilities

For the purposes of the applicable Data Protection Legislation, we are the data controller of any personal data we process. As a data controller, we are responsible for ensuring our systems, processes, suppliers and People comply with Data Protection Legislation in relation to the personal data we handle.

We provide our People with training and require our People to comply with this privacy policy, our Cookie Policy and our Data Retention Policy when dealing with personal data.

We take Personal Data Breaches very seriously, and are required to notify the Information Commissioner's Office in the event of such a breach.

When using, collecting and disclosing personal data, we follow the core data protection Principles underlying the Data Protection Legislation.

We have policies, procedures and records to demonstrate compliance with the Principles. Please contact us for further information on these policies, procedures and records.

### **3. How we collect, use and disclose your personal data**

Generally, we collect your personal data when you interact with us (for example, when entering into a relationship with us as Customer, a third party service provider or one of our People). However, from time to time we also need to collect personal data from other third parties in connection with our relationship with you. We also look at how our users access and use our Website, so we can offer the best possible experience. The following tables, available by clicking the dropdowns, summarise how we collect, use and disclose your personal data:

- Our Customers
- Service Providers
- Subscribers to our promotional material
- Users of our Website
- Our People and People making applications to become our People

## Our Customers

Types of personal data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as:</p> <ul style="list-style-type: none"> <li>• your name;</li> <li>• your postal and email address;</li> <li>• your phone number(s);</li> <li>• information regarding your moving situation;</li> <li>• personal identification documentation;</li> <li>• financial information:</li> </ul>	<p>Your <b>personal data</b> will be collected from various sources including:</p> <ul style="list-style-type: none"> <li>• when you contact us (through one of our departments and/or our <b>Associated Agents</b>) via email, telephone or in person;</li> <li>• providers of background checks;</li> <li>• notes and records kept for the duration of your engagement with us as a <b>Customer</b> (including details of any instructions, complaints and</li> </ul>	<p>Your <b>personal data</b> will be used for the following <b>purpose</b>:</p> <ul style="list-style-type: none"> <li>• delivering and improving the services we provide to you;</li> <li>• internal administration and management purposes;</li> <li>• fulfilling our contractual obligations;</li> <li>• fulfilling our legal obligations; and</li> <li>• where you have given us your clear, unambiguous consent to do so, your personal data may be used to</li> </ul>	<p>Your <b>personal data</b> may be transferred to:</p> <ul style="list-style-type: none"> <li>• our <b>third party</b> service providers who support the operation of our business;</li> <li>• other parties involved in the transaction, for the purposes of fulfilling our contractual obligations;</li> <li>• <b>Associated Agents</b>, for the purposes of fulfilling our contractual obligations;</li> <li>• other <b>third parties</b> such as our legal and</li> </ul>	<p>Please refer to our <b>Retention Policy</b>.</p> <p>We will ensure we keep all personal data up to date and shall archive and then permanently delete any <b>personal data</b> which is not necessary for the <b>purpose</b>.</p>

<ul style="list-style-type: none"> <li>• as evidence of proof of funds (buyers and tenants);</li> <li>• to transfer funds (landlords); and</li> <li>• to reimburse funds (tenants),</li> <li>• images/photographs of your property (vendors and landlords);</li> <li>• information regarding your employment status and salary (buyers and tenants); and</li> <li>• reviews/feedback from tenants (landlords).</li> </ul>	<p>meetings with us regarding our relationship and your engagement as a <b>Customer</b>);</p> <ul style="list-style-type: none"> <li>• CCTV while on our premises;</li> <li>• from property portals (such as Rightmove); and</li> <li>• publicly available sources.</li> </ul>	<p>contact you about and provide you with:</p> <ul style="list-style-type: none"> <li>• communications and/or marketing material for which you have specifically subscribed; and/or</li> <li>• to contact you about, and provide you with, the communications we think are relevant to your interests and preferences.</li> </ul> <p>Photographs and images of your property (internal and external) may be used in our marketing and promotional material including our <b>Website</b> only where you have given us <b>explicit consent</b> to do so. Often you will have given this consent as part of formalising our engagement.</p>	<p>other professional advisers and government departments; and</p> <ul style="list-style-type: none"> <li>• where you have given us your clear, unambiguous <b>consent</b> to do so, we may pass your <b>personal data</b> to selected <b>third parties</b> to provide you with information about services we feel may interest you.</li> </ul> <p>We shall only transfer personal data to <b>third parties</b> which is limited to the relevant <b>purpose</b> and is adequately protected.</p>	
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## Service Providers

Types of personal data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as your:</p> <ul style="list-style-type: none"> <li>• name and business information;</li> <li>• name and email address of your representatives;</li> <li>• identification documentation; and</li> <li>• payment details.</li> </ul>	<p>Your <b>personal data</b> will be collected from you directly.</p> <p>Further information (e.g. to verify your identity) may be collected from <b>third parties</b>, such as publicly available sources.</p>	<p>Your <b>personal data</b> will be used for relationship management and file opening, administration, to fulfil our contractual obligations and as required by law (e.g. anti money laundering).</p>	<p>Your <b>personal data</b> may be disclosed to:</p> <ul style="list-style-type: none"> <li>• our <b>Customers</b>; and</li> <li>• our <b>Associated Agents</b>,</li> </ul> <p>for the purposes of fulfilling our contractual obligations.</p> <p>We shall only transfer personal data to <b>third parties</b> which is limited to the relevant <b>purpose</b> and is adequately protected.</p>	<p>Please refer to our <b>Retention Policy</b>.</p> <p>We will ensure we keep all personal data up to date and shall archive and then permanently delete any <b>personal data</b> which is not necessary for the <b>purpose</b>.</p>

## Subscribers to our promotional material

Types of personal data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as your:</p> <ul style="list-style-type: none"> <li>• name and business information;</li> <li>• email address;</li> <li>• job title; and</li> <li>• who you work for.</li> </ul> <p>Additional information may be <b>processed</b> where it is provided by you, for example:</p> <ul style="list-style-type: none"> <li>• in correspondence, in connection with any properties, or</li> <li>• in letting us know your</li> </ul>	<p>Your <b>personal data</b> is collected when you register and opt in to receive:</p> <ul style="list-style-type: none"> <li>• marketing/promotional material;</li> <li>• information and updates about our properties; and</li> <li>• details of events.</li> </ul> <p>You can <b>contact us</b> at any time to amend your preferences or opt out of communications from us. You will also be sent the option to opt out of future communications in every communication you receive from us.</p>	<p>Where you have given us your clear, unambiguous consent to do so, your <b>personal data</b> will be used to:</p> <ul style="list-style-type: none"> <li>• contact you about, and provide you with, the communications we think are relevant to your interests and preferences; and</li> <li>• understand our subscribers preferences and interests so we may improve our services, communication and marketing material.</li> </ul>	<p>Your <b>personal data</b> may be transferred to our <b>third party</b> service providers who support the operation of our business. Where you have given us your clear, unambiguous <b>consent</b> to do so, we may pass your <b>personal data</b> to selected <b>third parties</b> to provide you with information about services we feel may interest you. We shall only transfer personal data to <b>third parties</b> which is limited to the relevant <b>purpose</b> and is adequately protected.</p>	<p>Please refer to our <b>Retention Policy</b>. We will ensure we keep all personal data up to date and shall archive and then permanently delete any <b>personal data</b> which is not necessary for the <b>purpose</b>.</p>

interests and how/when you wish to be contacted by us.				
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## Users of our Website

Types of personal data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as:</p> <ul style="list-style-type: none"> <li>technical information, including 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, type of device</li> </ul>	<p>Your <b>personal data</b> is collected when you:</p> <ul style="list-style-type: none"> <li>use our <b>Website</b> (e.g. browsing, searching);</li> <li>provide us with personal information to enable us to contact you and</li> </ul>	<p>Your personal information is used to:</p> <ul style="list-style-type: none"> <li>tailor and enhance your user experience;</li> <li>improve the functionality of our <b>Website</b>;</li> </ul>	<p>Your <b>personal data</b> may be transferred to our <b>third party</b> service providers who support the operation of our business.</p> <p>Where you have given us your clear, unambiguous <b>consent</b> to do so, we may pass your <b>personal data</b> to carefully selected <b>third parties</b> (including but</p>	<p>Please refer to our <b>Retention Policy</b>.</p> <p>We will ensure we keep all personal data up to date and shall archive and then permanently delete any <b>personal data</b> which is not necessary for the <b>purpose</b>.</p>

<p>used to access our <b>Website</b> and the location of where you access our <b>Website</b> via a mobile device;</p> <ul style="list-style-type: none"> <li>information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our <b>Website</b> (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), and methods used to browse away from the page and any phone number used to call our customer service number; and</li> <li>your name and email address/other contact details.</li> </ul>	<p>let us know of your marketing preferences; and</p> <ul style="list-style-type: none"> <li>contact us via email</li> <li>contact us using our online forms.</li> </ul>	<ul style="list-style-type: none"> <li>ensure our <b>Website</b> caters to our users' preferences;</li> <li>contact you about, and provide you with, the communications we think are relevant to your interests and preferences; and</li> <li>contact you and provide you with information about our services.</li> </ul>	<p>not limited to Facebook) who may process your personal data to provide you with information about properties and/or property related services.</p> <p>We shall only transfer personal data to <b>third parties</b> which is limited to the relevant <b>purpose</b> and is adequately protected.</p>	
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## Our People and People making applications to become our People

Types of data	Collection	Purpose	Disclosure	Retention Period
<p><b>Personal data</b> such as</p> <ul style="list-style-type: none"> <li>• your name, address, contact details, education and employment history;</li> <li>• background checks (financial and criminal);</li> <li>• identification documentation;</li> <li>• right to work status;</li> <li>• information relating to next of kin/ dependants; and</li> <li>• financial information including bank details and identifiers (e.g. National Insurance numbers).</li> </ul>	<p>Your <b>personal data</b> will be collected from various sources including:</p> <ul style="list-style-type: none"> <li>• your application form/CV;</li> <li>• recruitment agencies and websites;</li> <li>• providers of background checks;</li> <li>• notes and records kept for the duration of your employment (including absences, appraisals,</li> </ul>	<p>Your <b>personal data</b> will be used for the following <b>purposes</b>:</p> <ul style="list-style-type: none"> <li>• human resources administration;</li> <li>• assessing suitability/eligibility and/or fitness to work;</li> <li>• security; and</li> <li>• training.</li> </ul> <p>Photographs and images of you, your name, and information about your education and employment may be used in our marketing and promotional material including our <b>Website</b> and pitches to <b>Clients</b>.</p>	<p>Your personal data may be transferred to</p> <ul style="list-style-type: none"> <li>• our <b>third party</b> service providers who support the operation of our business;</li> <li>• our <b>Customers</b>; and</li> <li>• our <b>Associated Agents</b>,</li> </ul> <p>for the purposes of fulfilling our contractual obligations. We shall only transfer <b>personal data</b> to a <b>third party</b> which has been limited to the relevant <b>purpose</b>.</p>	<p>Please refer to our <b>Retention Policy</b>. We will ensure we keep all personal data up to date and shall archive and then permanently delete any <b>personal data</b> which is not necessary for the <b>purpose</b>.</p>

<p>We may also process <b>sensitive personal data</b> such as health details, racial origin, religious beliefs and information about offences/ alleged offences.</p>	<p>disciplinary action);</p> <ul style="list-style-type: none"> <li>• providers of occupation health services; and</li> <li>• CCTV and security access devices.</li> </ul>			
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#### 4. Transfers of personal data

Personal data may be transferred to one of our Associated Agents for the purposes of fulfilling our obligations to our Customers.

We also use a number of suppliers in connection with the operation of our business and they may have access to the personal data we process. For example, an IT supplier may collect data on our behalf and/or see our personal data when providing software support, or a company which we use for a marketing campaign may process contacts' personal data for us.

When contracting with suppliers and/or transferring personal data to a different jurisdiction, we take appropriate steps to ensure that there is adequate protection in place and that the Principles are adhered to.

#### 5. Your rights

The Data Protection Legislation gives you certain rights in relation to the information held about you., including the right to:

request a copy of your personal data;

request your inaccurate personal data is corrected;

request your personal data is deleted and destroyed; and

opt out of /unsubscribe from receiving electronic promotional/marketing communications from us.

Should you wish to make a request in line with your rights as an individual (a "Request"), please contact us as follows:

If you are:

- A customer - please contact our office
- A Service Provider - please contact our office
- A Subscriber to our promotional/marketing material - please contact our office. Please note, you will always be given the option to unsubscribe from our promotional /marketing material in each communication you receive.
- A User of our Website - please contact [office@andersonreid.com](mailto:office@andersonreid.com)
- One of our People or a person making an application to become one of our People - please contact our office
- Anybody else - please contact our office

### **Exercising Your Rights**

Once you have made contact with us, you will be asked to complete a form and you will be asked to provide proof of your identity (except where your request relates to unsubscribing from marketing/ promotional material, which does not require proof of identity, or if it would be disproportionate to do so given the circumstances). We will provide information on the action taken on your Request without undue delay (and in any event within one month of receipt of proof of your identity, or, where you simply wish to unsubscribe, receipt of your Request).

This response period may be extended by two further months where necessary (see point 4 below for examples of when an extension might be necessary). We will inform you of any such extension within one month of receipt of the Request, together with the reasons for the delay.

If we do not take action on your Request, we will inform you without delay (and at the latest within one month of receipt of proof of your identity) of the reasons for not taking action, and on the possibility of lodging a complaint with the Information Commissioner. See point 4 below for examples of when we may not be able to take action on your Request.

Examples of when we may delay or be unable to take action on a Request include:

if the Request includes information of other individuals;

if you have not given us all the information we need, including proof of identity;

if we have a legal obligation to keep certain information;

if your Request is excessive;

if the data is necessary for establishing, exercising or defending legal claims; and/or

if we are not required to action your request under the Data Protection Legislation.

In accordance with our Data Retention Policy, Requests and correspondence regarding Requests will be held for the current year plus six years.

For further information about your rights under the Data Protection Legislation and how to raise any concerns you may have, please refer to the ICO website: [www.ico.org.uk/your-data-matters](http://www.ico.org.uk/your-data-matters)

## **6. Security**

Information security is a key element of data protection. We take appropriate measures to ensure our systems, processes, suppliers and People secure personal data and protect it from loss or unauthorised disclosure or damage. Please contact us if you require further information regarding our policy and approach to information security.

## **7. Computer Security**

Keep yourself safe from malware and viruses with adequate, up to date security on your computer. You can usually download free basic protection from providers such as AVG and McAfee, but for more comprehensive cover, it's best to choose security software. Keep your software switched on and up to date, and make sure that your operating system has the latest updates. It's a good idea to run regular scans on your computer.

When you're opening emails, be careful. Don't click on links to download files or open attachments you haven't asked for, or aren't expecting, as they may contain viruses. Back up all your files so they're available if the worst happens and your computer is infected by a virus.

## **8. Cookies**

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

## **9. Consent to marketing**

Where we wish to transfer your personal data to third parties who are not involved in the provision of our services (for example, mortgage providers and providers of legal services) but who we consider might interest you, we will always ask you to give your consent. Where you give us such consent (e.g. you tick the relevant consent box when registering in person at one of our offices), but you then decide/omit to provide consent at a subsequent opportunity (e.g. you later re-register online and do not tick the relevant consent box, having previously ticked an equivalent consent box in our office) you will be deemed to continue to consent until you contact us to formally confirm you wish to withdraw your initial consent (which you can do at any time).

#### **10. Changes to our privacy policy**

We keep our privacy policy under regular review. If we make changes to our Privacy Policy that affect how we handle your data, we will let you know by email. Minor changes will not be notified. You can check our Privacy Policy at this page at any time.

#### **11. Questions, comments and complaints**

Questions, comments and complaints regarding this privacy policy should be addressed to:

Anderson Reid Estates, 296 Sandbanks Rd, Poole, BH14 8HX or by writing to us at [office@anderosnreid.com](mailto:office@anderosnreid.com)

Our People must inform our Data Protection Office immediately if they receive a complaint relating to how we have processed personal data so our complaints procedure can be followed.