



## DATA PROTECTION PRIVACY POLICY

The Lee, Shaw Partnership are committed to respecting and protecting your privacy. We want to be completely transparent about how we deal with our Client's data and have this policy in place in order that you can feel confident about privacy and security of the personal information that you provide to us.

Our Privacy Policy tells you about all information that we record about you. It covers both information that could identify you and information that could not. It also tells you how you can check that the personal information about you that we keep is accurate and how you can instruct us to erase this information from our files.

### WHO ARE WE

This is the privacy policy of **The Lee, Shaw Partnership Limited** (trading as **The Lee, Shaw Partnership**). In this document, "we", "us" or "our" refers to **The Lee, Shaw Partnership**.

**The Lee, Shaw Partnership Limited** trading as **The Lee, Shaw Partnership**. Registered Office: Worcester House, 64 Hagley Road, Stourbridge, West Midlands DY8 1QD. Registered in England No. 8161823

For the purposes of the Data Protection Act 1998 (The Act) and General Data Protection Act (GDPR) Regulation (EU) 2016/679, we are what is known as the Data Controller of any information or any personal data you provide to us, **Registration Number Z5879645**.

### PERSONAL INFORMATION

Whilst using our website, emailing us or making direct contact with one of our Offices, you may be invited to provide personal information (i.e. name, address, email, telephone etc). This information will be used to administer our website, applications, client database, marketing material and perform our contractual obligations. We will ensure that all personal information is held securely in accordance with the Data Protection Act 1998. By supplying telephone, address or email details, you consent to us contacting you using that method.

Those already registered with The Lee, Shaw Partnership, we will rely upon Legitimate Interest to process data and make contact with general marketing and property matching and there is an option to unsubscribe or change preferences.

You don't have to register to access our website; however, we want to help you find exactly what you require as quickly and smoothly as possible. Therefore the more we know about your property preferences the easier it is for us to help you. For this reason we encourage you to register with us. Once registered we are in a better position to recommend specific properties or services that may be of potential interest to you.

If you do not register, the personal data we collect from you will be limited to the specific enquiry you have made and we will use that data for no other purpose than to facilitate that enquiry.

## **HOW WE COLLECT INFORMATION FROM YOU**

You may provide information about yourself by: completing forms on our website, completing an Agency Agreement, filling out a tenancy application form or by corresponding with us by telephone, email or in person. The information you provide may include (but is not limited to) your name, title, date of birth, address, email address, phone number or other contact information, financial details including your financial history, employment details and the records and contents of any correspondence and communications you have with us or any feedback which you leave for us.

When you visit our website we may automatically collect information about your computer, including your IP address, information about your visit, your browsing history and how you engaged with our website.

## **HOW WE USE YOUR INFORMATION**

We understand that you trust us with your personal information. Generally, we will only collect, use and hold your information for the following purposes:

- To contact you;
- To perform our obligations arising from any contracts entered into between you and us and to provide you with any information, products and services that you have requested from us;
- Assessing tenancy applications by carrying out credit searches and reference checks and to contact employers, banks, referees, guarantors and credit reference agencies as appropriate;
- To Process payments / transactions including: Rent collection, Card Payments, Accounting, Authorisation, Clearing, Refunds, Auditing, Billing and Reconciliation;
- To provide you with information about any other goods and services that we offer;
- With your permission to allow selected third parties to provide you, with information about goods or services which we feel may interest you;
- 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 your computer;
- To verify your identity;
- To protect against and prevent fraud, unauthorised transactions, tax evasion and money laundering (please see below);
- To manage and adhere to any Statutory Regulations and compliance matters and comply with the requirements imposed by law or any court order;
- Some information may be processed in accordance with public interest; i.e. instances of anti-social behaviour

## **ANTI-MONEY LAUNDERING**

To assist you with any property related service we are required to comply with the “Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017”. We are required by law to obtain certain information from you to comply with these regulations. The information provided will only be used by

us in relation to complying with the Regulations and will not be shared with any other party outside of the company unless we are required to do so under law.

We reserve the right to employ third party electronic verification for the purpose of verifying identity. Such searches will not affect your credit rating.

## **HOW WE STORE AND PROTECT YOUR PERSONAL INFORMATION**

The security of your personal information is very important to us and we are committed to protecting the information we collect. We have in place administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. We use a third party payment service that uses SSL encryption to take payments by credit or debit card. We do not store your card details if you use this service.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

Personal data that we hold will only be retained for as long as it is necessary for the fulfilment of the purpose for which the personal information was obtained, unless otherwise required or authorised by law. We take measures to destroy or remove personal information that is no longer required for the purpose for which we collected it.

## **HOW LONG DO WE KEEP YOUR DATA FOR**

We will keep information for a reasonable amount of time in order to perform our services or obligations as identified above.

We only keep your information for as long as necessary. As part of our affiliation with The Royal Institution of Chartered Surveyors (RICS) we are bound by their code of conduct and as such we keep personal information for up to 7 years after our last contact with you.

## **WHO MIGHT WE SHARE YOUR PERSONAL DATA WITH**

We will not sell or rent your information to third parties nor do we disclose personal information to third parties, except as described in this Privacy Policy or as indicated via our consent process at the time the data is collected.

Whilst arranging appointments between clients certain information may be shared in order to perform our contractual obligations.

Whilst carrying out our contractual obligations under our property management services personal information may be passed to third parties. This may include, (but is not limited to), contractors, utility suppliers, local authorities, insurance providers, mortgage providers and freeholders or their representatives. Your consent is not required for this purpose and cannot be unreasonably withheld.

If you are making a payment by credit or debit card then your payment and the data you provide in relation to that payment will be processed by a third party payment service such as Global Payments or WorldPay.

Our Estate Agency software is a cloud based software solution. By us inputting your personal data it will be transferred over the internet to the software supplier using 128 bit encryption. The software supplier will store this personal data but will not use it in any way other than providing us with a software solution.

In certain circumstances we may offer you other ancillary services from our recommended partners. These providers include Financial Advisors, Solicitors, Surveyors, Energy Assessor, Photographer and Floor Plan provider. We would only pass your details onto these service providers with your direct consent.

We may pass your information to a third party if we consider that we need to in order to comply with any law or regulation, where we suspect that any criminal offence may have been committed, to protect our rights, property or safety or that of others and in any circumstances where we consider that we are permitted to do so by law or regulation.

#### **TRANSFER OF INFORMATION OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)**

Your use of the website may result in personal data provided by yourself being transferred across national boundaries. By visiting our website and communicating with us electronically, you consent to the transfer of your personal data outside of the EEA.

#### **JOB APPLICATIONS & EMPLOYMENT**

If you make an application for employment or express an interest in employment we may retain that information for up to 2 years in case we wish to contact you regarding possible employment opportunities.

If you are employed by us we will collect information about you and your work at intervals during your employment. This information will only be used for purposes which relate directly to your employment. Following the termination of your employment this data will be held for six years before it is destroyed or deleted.

#### **IF YOUR INFORMATION OR DATA CHANGES**

You must ensure that any information you provide to us is correct and complete. You can ask us to rectify or update your personal information at any time by email to [privacy@leeshaw.com](mailto:privacy@leeshaw.com) or writing to us at The Lee, Shaw Partnership, Worcester House, 64 Hagley Road, Stourbridge DY8 1QD

#### **WHAT ARE YOUR RIGHTS**

You may have the right to:

- Get confirmation that we are holding personal information about you
- Request further information about the personal information we are currently holding about you
- Request a copy of the personal information we hold about you

The right to access personal information could, in some circumstances, be limited by statutory law requirements.

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate.

If you would like to object to us processing any of your information you can contact us outlining what processing of information you would like to object to.

If you would like us to delete, block or anonymise information we hold about you, please contact us outlining the specific information you would like amended.

If you wish to exercise any of these rights, please contact us at [privacy@leeshaw.com](mailto:privacy@leeshaw.com)

#### **COOKIES**

Our website, or an embedded component from a trusted partner may automatically create a 'cookie' when you visit us. A 'cookie' is a piece of information that is held on your PC, which enables our website to recognise you on subsequent visits and allows us to tailor your visit to your specific requirements. As the 'cookie' is based on your PC we are unable to recognise you if you visit any of our websites from a different PC. Our use of 'cookies' does not include the collection of any personal information regarding the use of your PC or internet browsing in any way. If you do not want a cookie to be created on your PC, web browsers such as Internet Explorer, Safari,

Chrome and Firefox provide the option to disable them. Please note that some personalised services on this site may not be available if you choose to disable cookies.

### **LINKS TO OTHER WEBSITES**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

### **WHAT IF YOU FEEL YOUR DATA HAS NOT BEEN DEALT WITH IN THE RIGHT WAY**

If you wish to make a complaint about how we have handled your personal data then please contact us at [privacy@leeshaw.com](mailto:privacy@leeshaw.com) or by writing to us at The Lee, Shaw Partnership, Worcester House, 64 Hagley Road, Stourbridge, West Midlands DY8 1QD.

If you are not satisfied with our response or believe that we are not processing your personal data in accordance with the law you can complain to the Information Commissioners Office (ICO).