

## Privacy Policy (General)

Proper Local Limited – 17<sup>th</sup> May 2018

This Privacy Policy has been prepared with reference to the UK General Data Protection Regulations (GDPR) which came into effect on 25<sup>th</sup> May 2018.

Our Privacy Policy (General) provides Consumers with details of how their personal information (Data) is obtained, used and held by Proper Local (the Company) and should be read in tandem with the Company's Privacy Policy (Website) which provides details of how Data is obtained, used and held where consumers use the Company's website. The Website Policy can be found here: <https://www.properlocal.co.uk/images/privacy-policy.pdf>

### **Statement**

We truly value the interest Consumers show in our Company and the services and properties it provides.

As the world becomes increasingly digital the amount of personal data produced and circulated will inherently increase and we undertake to only hold and use personal data which is necessary for the Company to fulfil its legal obligations, or to provide a service to Consumers who have requested the Company to provide a service previously, or have made an initial enquiry for our services.

We will not hold consumer data for an extended period of time and we will not pass any data we hold onto third parties unless we are required to do so by law, or have your permission to do so.

At no time has the Company purchased Consumer Data, and at no time will we sell Consumer Data to third party companies.

### **Your Rights**

**The right to erasure (“right to be forgotten”):** Consumers have the right to have their data removed from our database(s) at any time, provided that we are not legally obligated to store that data.

You can request to have your data deleted by:

1. Emailing us at [weare@properlocal.co.uk](mailto:weare@properlocal.co.uk)
2. Writing to us at: Proper Local, 40 Bank Street, London, E14 5NR

**To be informed:** Consumers have the right to be provided with information about how their data is processed and the reasons for processing

**To be given access:** Consumers have a right to see what data your business holds about them.

**To be able to rectify or change:** Consumers can have their personal data rectified if it is inaccurate or incomplete.

**To restrict processing:** Consumers have a right to ‘block’ or suppress processing of personal data.

## **Services**

Proper Local is an estate and letting agency based in Canary Wharf (40 Bank Street, London, E14 5NR). We sell and rent property in the local area, providing a property management service to landlords who request this service.

As part of our service we work with third party companies to fulfil some aspects of our service, including but not limited to solicitors, surveyors, mortgage companies and mortgage brokers, tenant referencing companies, inventory companies and cleaning companies. Consumer Data will only be passed to these companies in instances where it is a necessary part of the service we provide (such as passing tenant contact information to a referencing company) or where you have asked us to do so (such as you requesting us to put you in touch with a mortgage broker).

## **Our Consumers**

Our consumers fall into two categories: Clients and Customers

The amount and type of data we hold for our Clients and Customers is directly proportionate to the type of service we provide to them.

**Clients:** Our Clients are property owners who use our services to find buyers or tenants for their property. Our clients may also be referred to as landlords or sellers/vendors.

**Customers:** Our Customers are individuals/families who use our services to find a property to buy or rent. Our Customers may also be referred to as buyers or tenants.

## **How do we collect Data?**

In all instances Consumers pass their initial basic data to us freely via either our website, over the phone, or via property portals such as Rightmove, Zoopla or Prime Location.

If we require more detailed information, then we will request it from you directly.

We do not ever seek to obtain data from third parties, it is given to us by you.

## **What types of Data do we collect?**

In most instances we collect a very basic level of data initially, to include your name, email address, in some instances your home address, the address of the property you wish to sell or rent (Clients only) and phone number.

For our Customers we will then collect your property search criteria.

If you then go on to apply for a tenancy we will then request more detailed data such as your employer's name and address, your occupation, salary details and previous home address(es). We collect this data so we can perform referencing checks on you.

For both potential tenants, and for buyers who have had their offer accepted, we will also collect ID proofs from you such as your passport, visa, driving licence and proofs of current address.

For our landlord and vendor Clients we will collect ID proofs as part of our Anti Money Laundering Obligations.

### **What do we do with your data?**

At the outset of our relationship with you we only use your data to contact you in order to progress the interest you have shown in our services.

For example, if you expressed an interest in a property we have for sale marketed on Rightmove and provided your basic contact details, we will contact you to find out if you would like to view it.

We may also recommend other similar properties to you, or register your search criteria on our database so you are made aware of similar properties which become available in the future.

If you have a property to sell or rent we will contact you in order to arrange a valuation of the property. We will then register your property and basic data on our database.

The only instances in which we would pass your data onto a third party are covered by the sections '*Services*' and '*What types of data do we collect?*'

### **How do we store your data?**

The data we hold is all held electronically. Proper Local is a paperless company and any data given to us in a hard copy format is scanned and saved electronically with the original being shredded.

Consequently, all the data we hold is only ever held electronically on our email server, our network folder, or on our cloud-based property database.

### **How long do we keep data for?**

The length of time we keep data for is proportionate with the type of service you initially enquired about, save for instances where we are legally obliged to hold data for an extended period of time (such as financial data resultant of a tenancy, or ID proofs for Right to Rent Regulations and Anti Money Laundering Regulations).

Our default positions for the period of time we will hold your data are as follows, although you may request for us to delete your data at any time.

### **Tenants or Buyers searching for a property to rent or buy**

In the vast majority of cases we will have received an email from a property portal with a request to contact you. We will try to contact you up to 5 times to follow up your interest. If we have been unable to contact you, we will stop attempting to contact you and your data will be deleted from our database after no longer than 6 months. If we have successfully contacted you, we will register your requirements on our database and send you further similar properties as they come to the market. In any property alert (a new property, price reduction, or weekly email) generated by our database you can manage your contact preferences via a link at the bottom of the email. However, once every six months we perform a bulk delete of data held on our database. If we have emailed you directly, rather than from our database, you will also find an unsubscribe link in our email footers.

### **Property owners with a property to sell or rent**

In some cases we will have received an email from a property portal with a request to contact you. You may have also contacted us directly and given us basic information about you and your property. We will try to contact you up to 5 times to follow up your interest. If we have been unable to contact you, we will stop attempting to contact you and your data will be deleted from our database after no longer than 12 months.

### **Data held on our email servers**

We delete all data on our email servers a maximum of every six months.

### **Data held on our network folders**

Data held on our network folders is typically of a more in depth and personal nature and could include proofs of ID, proofs of address and credit search information. We are obliged to retain this information for a period of 7 years from when it first became relevant (such as the commencement of a tenancy).

### **Security**

All data is held electronically either directly on our PCs, or on cloud-based servers accessed via our PCs or mobile devices. All our PCs have active anti virus software and all PCs and mobile devices are password protected.

### **Our rights to retain Data**

**Compliance with legal obligations:** There are a number of legal obligations that require estate agents to collect, store or process personal information for set periods of time.

**Contractual necessity:** In order to fulfil certain transactions, or contractual obligations, estate agents are required to process or retain certain information.

**Consent:** If you have opted in to receiving information from us we will continue to communicate with you (see '*How long do we keep data for?*') or until such a time you instruct us not to.

**Legitimate interest:** If you have given us your data prior to the commencement of the GDPR we reserve the right to communicate with you in accordance with the periods of time set out within the section '*How long do we keep data for?*'. We consider this to be justifiable as all communications you may have previously received from us (generated by our database) have historically had the function for you to be able to opt out, or manage your contact preferences.