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Privacy Notice

The following information constitutes our Privacy Notice. In this document, "we", "our", or "us" refers to Glovers Estate Agents.

Glovers Estate Agents is committed to protecting and processing personal data in accordance with the General Data Protection Regulations and the Data Protection Act 2018. For the purpose of this legislation and personal data, The Property Agency Ltd trading as Glovers Estate Agents is the Data Controller, and Michael Glover is the person responsible for data protection. You can contact us at 33 High Street, Kings Heath, Birmingham B14 7BB 0121 443 4343, or by e-mail about privacy at property@glovers.uk.com.

Introduction

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We take seriously the protection of your privacy and confidentiality. We understand that you are entitled to know that your personal data will not be used for any purpose unintended by you, and will not accidentally fall into the hands of a third party.
3. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
4. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
5. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org
6. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website or otherwise.
7. Your data is always stored within the European Union or outside the EU with an organisation operating under the General Data Protection Regulations. Your personal data is stored securely in hard copy format on our property files, or digitally within our

cloud based 'Expert Agent' Estate Agency and Property Management software, and 'Kashflow Software' accountancy system.

Personal information we may process

We aim to process data, whether personal data or not, only to the extent necessary for us to provide our clients with our services and for other agreed purposes.

Often we may aggregate information in a general way and use it to provide class information. If we use it for this purpose, you as an individual will not be personally identifiable.

Personal information that we may process may include:

Client and customer information

If you are a client or a customer, personal information may include your identity and contact information, information about your family members, and financial information. Such information can include name, telephone number, address, email address and approximate budget if relating to a purchaser or tenant, details from solicitors, estate agents, and surveyors' details if required.

No sensitive data is collected, i.e. race, religion, life-style. Under the Immigration Act, we do take details of nationality which is kept for 12 months after a tenancy ends.

In order to check the personal identity of vendors, landlords, purchasers and tenants, we record that we have taken photocopies of passports or driving licence and a letterhead from an official body such as a Bank, Building Society, Government Department. We also check for Politically Exposed People

We may hold signed contracts enabling us to sell or rent a property, a signed brochure to indicate that vendors agree with the accuracy of our sales brochure for further advertising.

Proof of funds including bank statements and building society statements and Mortgage agreement in principle. Personal financial data is processed by Financial Advisers, mortgage lenders etc who confirm to us if purchasers have sufficient funds for purchase.

In most cases, your personal data will have been provided to us by you, verbally, in written form, or through internet property portals. However, with your consent, or if it is necessary in order to provide you with our services, we may have obtained your personal data from a third party source.

Related third party information

We may process your personal data if you have a personal or business connection with any of our clients or suppliers. For example, you may be a family member, business partner, other adviser, supplier or transaction counterparty.

The data we process may include contact information, information about your business activities, and financial information such as that relating to income and expenses.

We may be given your personal data by our clients or suppliers, or by third parties acting on the instructions of a client or a supplier.

Supplier information

If you supply our business with goods or services, including subcontracted services that we supply to our clients, then we may process your personal information. However, we do so only to the extent necessary to contract with you.

The bases on which we process information about you

There are six lawful bases of processing your data:- contract fulfilment, consent, legitimate interests, a legal obligation, public task, and a vital interest. The law requires us to determine under which of six defined grounds we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

7. Information we process because we have a contractual obligation with you

When a contract is formed between you and us, in order to carry out our obligations under that contract we must process personal information.

As examples, a contract between us could be formed by:

- your signing an agreement to allow us to act as agent for you
- your signing an agreement to allow us to carry out services required in order to let or to buy a property
- your agreement to our terms and conditions when you register on our website

We use your information in order to provide you with our services under that contract, for example:

- to register you as a new customer

- to help you find properties, prospective buyers or tenants
- to provide your personal information to a vendor, buyer, tenant, landlord, solicitor or conveyancer, and to a financial services provider
- to verify your identity for security and legal purposes
- to carry out credit checks and to obtain personal references
- to provide your personal information to a third party utility provider in connection with a rental
- to providing your contact details to a third party contractor to arrange and conduct maintenance works at your residence
- to manage payment methods and take deposits
- to negotiate on your behalf
- to provide you with advice
- to pay rent we have collected into your bank account

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

8. Information we process with your consent

Only when you have given us explicit permission to do so, do we process your personal information under the basis of consent.

For example, you might have agreed that we may track your actions on our website or pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by telling us. However, if you do so, you may not be able to use our services further.

9. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest of doing so, either to you or to us.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business
- responding to communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so
- to provide property updates
- providing information to a third party surveyor

10. Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

We will disclose personal information where required by law or legal process, for the administration of justice, for investigations by law enforcement or regulatory bodies, such as the Ombudsman and or HM Government bodies, to protect and defend our property and legal rights, or to protect the rights, property, or safety of our staff, or clients.

Our communications and contracts inform and confirm that we are legally obliged to collect personal data for checking identities.

11. Communicating with you

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

12. Dealing with complaints

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

If the complaint relates to information on our website and we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

We may compile statistics from information relating to complaints to assess the level of service we provide, but not in a way that could identify you or any other person.

13. Customer relationship management system

We use a customer relationship management (CRM) system to process personal data.

Data subjects include existing, former and prospective clients and their agents and representatives.

Personal data that we process includes the name of the person, information about his or her employer and job position, and contact information.

We process this data on the basis of consent for purposes that include:

- managing and developing our business or services
- informing clients and prospective clients about our services
- determining relationships between clients and our partners and employees
- analysing whether we provide clients with a high level of service

We do not sell or share any personal data with third parties unless we have explicit consent to do so from the data subject.

14. Job applications and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

Use of information we collect through automated systems when you visit our website

15. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience, and the website owner with statistics about the actions you have taken.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use. If you choose not to use cookies or you prevent their

use through your browser settings, you may not be able to use all the functionality of our website.

Our website may use cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

We would use cookies in the following ways:

- 15.1. to track how you use our website
- 15.2. to record whether you have seen specific messages we display on our website
- 15.3. to provide a consistent personalised experience across our site
- 15.4. to record your answers to surveys and questionnaires on our site while you complete them

16. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information that could identify your location, such as your IP address. We also record information reported by the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website. However, our policy is not to use such data for the purpose of personal identification.

Disclosure and sharing of your information

17. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

18. Third party advertising on our website

Third parties could advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

Management of your information

19. Right of access to your personal information

- 19.1. At any time you may review or update personally identifiable information that we hold about you.
- 19.2. To obtain a copy of the information we hold about you, please contact us. After receiving the request, we expect to provide you with the information, free of charge within one month of a request which can be extended by a further two months if requests are complex or we have too many to deal with. If we extend, we shall inform you within one month with the reason for requesting an extension. If the request is "manifestly unfounded or excessive", for example because the request is repetitive, we can charge a reasonable fee, considering our administrative costs, or we can refuse to respond. If we refuse, we are obliged to explain and inform the client who can complain to the Information Commissioner's Office (ICO).
- 19.3. You may request at any time, amendments to certain personal information that is incorrect or irrelevant or to request that we block, erase or otherwise remove personal information by contacting our data controller

20. Right to rectification of your personal information

- 20.1. You have the right to have information corrected if it is inaccurate, out of date or incomplete. On request we will inform you about third parties that have received your data, and inform those third parties that the data is being rectified, where possible. We will comply with a request for rectification within one month. This can be extended by two months if a request is complex. If we decide not to act following a request for rectification, we shall explain why and inform them of the complaint procedure to ICO or bring a complaint before a court.

21. Right to erasure of your personal information

- 21.1. You have the right to be forgotten, whereby a request to remove data when there is no reason to continue processing it can be exercised. We shall also inform third parties, which we have sent such data to, that we are erasing it, unless it's impossible or will involve a disproportionate effort. However, the right to be forgotten is only under specific circumstances. This includes: where processing data is no longer necessary for the purpose it was first collected; when an individual has objected to having their data processed or has withdrawn consent; or if the data was unlawfully processed, so is in breach of GDPR

It is important to know that in certain circumstances, we can refuse a request to erase such data. This includes if it's being processed to comply with a legal obligation for performing a task that's been carried out in the public's interest. Other examples include refusal for public health purposes, or the exercise of legal claims.

22. Right to restrict processing of your personal information

- 22.1. You have the right to block or suppress the processing of your data. We can restrict data processing for different reasons, including:- when the accuracy of your data is contested, we shall restrict processing until accuracy is verified; when you have objected to the processing; if we no longer need the data, but you need it to establish or defend a legal claim. We should inform all third parties to whom the individual has disclosed the personal data, about restricting the processing. We should also inform you if we decide to lift a restriction on processing.

23. Verification of your identity

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

24. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us: to provide you with the services you have requested; to comply with other law, including for the period demanded by our tax authorities; and to support a claim or defence in court.

25. If you are not happy with our privacy policy

- 25.1. If you are not happy with our privacy policy or if you have any complaint then you should tell us. You can find further information about our complaint handling procedure upon request.
- 25.2. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office by phone on 0303 123 1113, or by email using the form on the website ico.org.uk.

26. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

27. Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

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last updated: May 2018