



Bromley Property Company - Privacy Notice for Clients

Who we are:

We are *Bromley Property Company* and, for the purposes of this notice, the term 'we' encompasses all those employed by us to carry out our business

Our Contact Details:

If you have any questions about this Privacy Notice, please contact:

lewis@bromleypropertycompany.com

Privacy laws

The processing of your personal data is governed by the General Data Protection Regulations (GDPR), enacted in the UK by the Data Protection Act 2018

The types of personal data we collect

The personal data we use may include:

- Your name, address and contact details, including email address and home and mobile telephone numbers.
- Payment details
- Personal preferences and requests
- The terms and conditions of your contract with us for the provision of estate agency services;

How we collect the personal data

Data might be collected through:

- Electronic, written or verbal correspondence with you; or
- Meetings in person.

Providing your personal data

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases, we need you to provide your personal data so we can provide estate agency services to you.

What we use your personal data for

1. Provision of estate agency services

- To support the sale of your property;
- As necessary to support the contract with you and to allow us to receive full payment for those services;
- To take steps at your request during the course of the sale of your property;

2. Business purposes

- As necessary for our own legitimate interests or those of other persons and organisations, subject to the rights and freedoms of you as a data subject;

3. To comply with a legal obligation:

- When you exercise your rights under data protection law;
- For the establishment and defence of legal rights;
- For activities relating to the prevention, detection and investigation of crime;
- To investigate complaints, legal claims and data protection incidents.

The legal basis for processing

In providing you estate agency services, we will process your personal data under Article 6 (1)b of the General Data Protection Regulations, on the legal basis that processing is necessary for the performance of a contract for the provision of our services, or in order to take steps at your request prior to entering into a contract, or in order to fulfil your instructions during the execution of that contract.

In addition, we may process your personal data on the following legal bases;

- Vital interests: the processing is necessary to protect someone's life - Article 6 (1) (d)
- Legitimate interests: the processing is necessary for an organisation's legitimate interests or the legitimate interests of a third-party Article 6 (1) (f)

Sharing of your personal data

Subject to applicable data protection laws we may share your personal data with:

- other organisations necessary for the sale of your property and who require your data in order to meet that requirement;
- Our legal and other professional advisors;
- Fraud prevention agencies, credit reference agencies, and debt collection agencies;
- Government bodies and agencies in the UK and overseas (e.g. HMRC) who may in turn share it with relevant overseas tax authorities and with regulators including the Information Commissioner's Office;
- Courts, to comply with legal requirements, and for the administration of justice;
- In an emergency or to otherwise protect your vital interests;
- To protect the security or integrity of our business operations and other clients;
- Payment systems and providers; and
- Anyone other party where we have your consent or as required by law

Use of your personal data for marketing purposes

With your consent, and subject to your communications preferences, we may use your contact details to send you communications containing information on new services which we think may be of interest to you. We will not share your data with any external party for marketing purposes.

You are free at any time to change your mind and withdraw your consent by contacting us using the details given at the top of this Notice. Doing so will not affect the estate agency services we provide to you.

How long do we keep your data?

Information will be kept for a minimum period of five years from the date of the completion of the sale of your property, or from the date the property is withdrawn from sale or from the date you end your engagement with us for the sale of your property, but may be held for longer periods where any of the following apply:

- Retention to facilitate future engagements. We will retain your contact data indefinitely in order to identify you as a returning client unless you exercise your right to be forgotten (see below).
- Retention in case of queries. We will retain your personal data as long as necessary to deal with any outstanding queries you may have;
- Retention in case of claims. We will retain your personal data for as long as you might legally bring claims against us; and
- Retention in accordance with legal and regulatory requirements. We will retain your personal data after you have received estate agency services based on legal and regulatory requirements and obligations pertaining at any given time.

Your rights under applicable data protection law

Your rights are, where applicable:

- The right to be informed about processing of your personal data;

- The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed;
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- The right to have your personal data erased (the "right to be forgotten");
- The right to request access to your personal data and information about how we process it;
- The right to move, copy or transfer your personal data ("data portability"); and
- Rights in relation to automated decision-making including profiling

You may exercise these rights by contacting us using the details given at the top of this Notice. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us using the details given at the top of this Notice.

You can also complain to the Information Commissioner's Office if you are unhappy with how we have used your data;

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>