

PRIVACY POLICY

This privacy policy is for:

Name: Huntley & Partners LLP
Address: 20 Luxus House, Forge Lane, Saltash, Cornwall, PL12 6LX
Telephone: 01752 206020
Email: enquiries@huntleyandpartners.com

Our Website: www.huntleyandpartners.com

It explains how we comply with the UK General Data Protection Regulation 2018 (UK GDPR), the Data Protection Act 2018 (DPA) and the Privacy and Electronic Communications Regulations 2003 [As Amended 2019] (PECR).

This policy will explain how we process, collect, manage and store personal details, the areas of our website that may affect your privacy and personal details, and how your rights under the UK GDPR, DPA & PECR are adhered to. Additionally, it will explain the use of cookies or software, advertising or commercial sponsorship from third parties, and the download of any documents, files or software made available to you (if any) on our website. Further explanations may be provided for specific pages or features of our website in order to help you understand how we, our website and its third parties (if any) interact with you and your computer/device in order to serve it to you (see Website Privacy Policy). Our contact information is provided above if you have any questions.

What Data We May Gather

We may collect the following information:

- ❖ Name and job title
- ❖ Contact information including telephone, mobile and email address and/or postal address
- ❖ Financial information including business accounts.
- ❖ Legal/contractual information for example, details of property ownership, Lease terms and conditions
- ❖ Photographs of property we are requested to offer for sale or provide valuation for
- ❖ Other information specifically relevant to client enquiries
- ❖ Identity verification data, for example date of birth, copies of driving licence/passport etc.
- ❖ Website usage data

How We Use This Data

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- ❖ To provide services and perform our contract with you as set out in our Terms of Engagement or letter of instruction
- ❖ To fulfil our legal obligations including money laundering regulations and identification checks
- ❖ To improve the products and services we provide
- ❖ To contact you in response to a specific enquiry
- ❖ To customise the website for you and to maintain and administer our software systems/IT infrastructure
- ❖ To send you promotional emails, mailings or to call you (with your specific permission) about products, services, offers and other things we think might be relevant to you
- ❖ To contact you (with your specific permission) via email, telephone or post for marketing or market research purposes
- ❖ To use in the investigation and/or defence of potential complaints, disciplinary proceedings and legal proceedings
- ❖ For our own internal records

We may pass your data to third party external organisations in order to carry out the above tasks or where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so. Examples of who we may pass information to include:

- ❖ Banks, solicitors, agents, or other professional parties
- ❖ Additional third party marketing websites i.e. Daltons Business, Zoopla, but only with your prior permission
- ❖ Anti Money Laundering software systems specifically www.smartsearch.com

We also receive personal information indirectly, from the following sources in the following scenarios:

- ❖ www.daltonsbusiness.com and www.zoopla.co.uk, our third party marketing partners, when requested to provide additional information on property we are offering for sale.
- ❖ Our valuation and appraisal partners for the specific purpose of providing Valuation Services where contracted to do so.

Lawful Bases

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- a) Your consent. You can remove your consent at any time. You can do this by email at enquiries@huntleyandpartners.com, or by telephone on 01752 206020, or by writing to us at: Huntley & Partners, 20 Luxus House, Forge Lane, Saltash, Cornwall, PL12 6LX.
- b) We have a contractual obligation.
- c) We have a legal obligation.
- d) We have a legitimate interest.

How We Store Your Personal Information

Your information is securely stored in secure management systems. Access is restricted to Partners and Employees of Huntley & Partners only, and to those within the business who are required to have access to your information for legitimate business purposes.

How Long Do We Keep Your Personal Information

We only keep your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, regulatory, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your Data Protection Rights

Under data protection law, you have rights including:

- ❖ **Your right of access** - You have the right to ask us for copies of your personal information.
- ❖ **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- ❖ **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- ❖ **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- ❖ **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.
- ❖ **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

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. Please contact us at enquiries@huntleyandpartners.com, or telephone 01752 206020. You can also write to us at: Huntley & Partners, 20 Luxus House, Forge Lane, Saltash, Cornwall, PL12 6LX if you wish to make a request.

Changes to Our Privacy Policy

This privacy policy may change from time to time in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.

How To Complain

If you have any concerns about our use of your personal information, you can make a complaint to us at Huntley & Partners LLP, 20 Luxus House, Forge Lane, Saltash, Cornwall, PL12 6LX.

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

WEBSITE PRIVACY POLICY

Data Protection Legislation

We and this website comply with the DPA 2018 (Data Protection Act 2018), the UK GDPR (UK General Data Protection Regulation) which came into effect on 1st January 2021 and the Privacy and Electronic Communications Regulations 2003 (PECR) as amended on 29th March 2019.

Controlling the Information About You

When you fill in a form or provide your details on our website, you will see one or more tick boxes allowing you to:

- ❖ Opt in/out of receiving marketing communications from us by email, telephone, text message or post.
- ❖ Opt in/out of receiving marketing communications from our third-party partners by email, telephone, text message or post.
- ❖ Agreement of our Terms & Conditions and/or Privacy Policy.

If you have agreed that we can use your information for marketing purposes, you can change your mind easily, at any time, via one of these methods:

- ❖ Sign in to our website and change your opt-in/opt-out settings.
- ❖ Send an email to enquiries@huntleyandpartners.com
- ❖ Write to us at: Huntley & Partners LLP, 20 Luxus House, Forge Lane, Saltash, Cornwall, PL12 6LX.

We will never lease, distribute or sell your personal information to third parties unless we have your specific permission, or the law requires us to. Any personal information we hold about you is stored and processed under our Data Protection Policy, in line with the Data Protection Act 2018.

Security

We will always hold your information securely.

To prevent unauthorised disclosure or access to your information, we have implemented strong physical and electronic security safeguards.

Use of Cookies

This website uses cookies to better the user's experience while visiting the website. As required by legislation, where applicable this website uses a cookie control system, allowing the user to give explicit permission or to deny the use of, or saving of, cookies on their computer/device.

What Are Cookies?

Cookies are small files saved to the user's computer hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server, to provide users with a tailored experience within this website.

Users are advised that if they wish to deny the use and/or saving of cookies from this website on to their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from this website and its external serving vendors, or use the cookie control system, if available, upon their first visit. Users should be advised that blocking all cookies may affect the performance or availability of aspects of the website.

We May Use Cookies To:

- ❖ Analyse our web traffic using an analytics package. Aggregated usage data helps us improve the website structure, design, content and functions.
- ❖ Identify whether you are signed in to our website. A cookie allows us to check whether you are signed in to the site.
- ❖ Test content on our website. For example, 50% of our users might see one piece of content, the other 50% a different piece of content.
- ❖ Store information about your preferences. The website can then present you with information you will find more relevant and interesting. To recognise when you return to our website. We may show your relevant content, or provide functionality you used previously.
- ❖ Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

Website Visitor Tracking

This website uses tracking software to monitor its visitors to better understand how they use the site. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

Adverts and Sponsored Links

This website may contain sponsored links and adverts. These will typically be served through our advertising partners, who may have detailed privacy policies relating directly to the adverts they serve.

Clicking on any such adverts will send you to the advertiser's website through a referral program which may use cookies and will track the number of referrals sent from this website. This may include the use of cookies, which may in turn be saved on your computer's hard drive. Users should therefore note that they click on sponsored external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Downloads and Media Files

Any downloadable documents, files or media made available on this website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available, users are advised to verify their authenticity using third party antivirus software or similar applications.

We accept no responsibility for third party downloads or downloads provided by external third party websites and advise users to verify their authenticity using third party antivirus software or similar applications.

Contact and Communication With Us

Users contacting us through this website do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use.

Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details to send you products/services information through a mailing list system or similar marketing tools. This is done in accordance with the regulations named in 'The Policy' above.

Email Mailing List & Marketing Messages

We may operate an email mailing list program, used to inform subscribers about products, services and/or news we supply/publish. Users can subscribe through an online automated process where they have given their explicit permission. Subscriber personal details are collected, processed, managed and stored in accordance with the regulations named in 'The Policy' above. Subscribers may unsubscribe at any time through an automated online service, or if not available, other means as detailed above and in the footer of any marketing messages (or unsubscribe from all MailChimp lists). The type and content of marketing messages subscribers receive, and if it may contain third party content, is clearly outlined at the point of subscription.

Email marketing messages may contain tracking beacons/tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of subscriber data relating to engagement, geographic, demographics and already stored subscriber data.

Our EMS (email marketing service) provider is MailChimp and you can read their privacy policy in the resources section of their website <https://mailchimp.com/legal/privacy/>.

External Website Links & Third Parties

Although we only look to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website. (External links are clickable text/banners/image links to other websites.

Shortened URLs

URL (Uniform Resource Locators) shortening is a technique used on the web to abridge URLs to something substantially shorter. This technique is especially used in social media and looks similar to this (example: <https://goo.gl/6TkzX3>). Users should take caution before clicking on shortened URL links and verify their authenticity before proceeding.

We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note they click on external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Social Media Policy & Usage

We adopt a Social Media Policy to ensure our business and our staff conduct themselves accordingly online. While we may have official profiles on social media platforms, users are advised to verify the authenticity of such profiles before engaging with, or sharing information with, such profiles. We will never ask for user passwords or personal details on social media platforms. Users are advised to conduct themselves appropriately when engaging with us on social media.

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page. You can find further information about some social media privacy and usage policies in the resources section below.

Data Breaches

We will report any unlawful data breach of this website's database, or the database(s) of any of our third party data processors, to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

Data Controller(s)

The Data Controllers for this website are :

Huntley & Partners LLP, 20 Luxus House, Forge Lane, Saltash, Cornwall, PL12 6LX
Telephone: 01752 206020
Email: enquiries@huntleyandpartners.com

Resources & Further Information

- ❖ UK GDPR - General Data Protection Regulation 2021
- ❖ Data Protection Act 2018
- ❖ Privacy and Electronic Communications Regulations 2003 [As Amended 2019]
- ❖ Google Privacy Policy
- ❖ LinkedIn Privacy Policy
- ❖ Mailchimp Privacy Policy