

Kempton Carr Croft ("We") are committed to protecting your data and respecting your privacy in accordance with the Data Protection Act 2018, the European General Data Protection Regulation (2016/679) (GDPR) and the Privacy and Electronic Communications Regulations 2003 (PECR).

This notice sets out the basis on which any personal data provided to us will be processed by us. In this document, the words 'you' and 'your' refer to anyone whose personal data we process. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of GDPR, the data controller is Kempton Carr Croft of Chatsworth House, 29 Broadway, Maidenhead, Berkshire, SL6 1LY.

What is your relationship with us?

The type of data we collect and the way we process it depends on your relationship with us. You may fall into one **or more** of the following categories. Please see the relevant appendices for information about the type of personal data processed, how it is processed and under what lawful basis.

- A Visitors to our website;
- B Individuals who contact us either via our website or by email, phone or letter;
- C Clients who use our services;
- D Agency applicants;
- E Individuals who subscribe to receive our marketing communications;
- F Tenants/residents of properties we manage;
- G Current and former employees and workers;
- H Job applicants;
- I Suppliers; and
- J Third parties including property owners and occupants, and their representatives, who are connected to the work we are carrying out on behalf of a client.

How Long Do We Keep Your Data?

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

With Whom Do We Share Your Data?

We may disclose your personal information to third parties if:

- we are under a duty to disclose or share it in order to comply with any legal or regulatory obligation including to statutory or regulatory bodies, law enforcement agencies, credit reference agencies; or
- we have your consent to do so (for example to agents selected by you); or

- we have a legitimate interest in doing so. Examples of where we have a legitimate interest in doing so will be where we share data with:
 - third parties and agents (including their sub-contractors) who provide services to us in order that we may enter and carry out our contracts;
 - any third party in the context of actual or threatened proceedings provided we can do so lawfully; and
 - third parties to whom we sell or negotiate to sell our business or assets.

Third parties with whom we share your data include data processors such as cloud storage providers. These third parties only process your personal data for specified purposes agreed with us and are bound by data protection regulations.

Further detail of the types of third party we use is provided in the sections dealing with each of the above relationship categories.

Do we transfer personal data outside of the European Economic Area (EEA)?

We do not transfer your data outside of the EEA. However some of our third party data processors may process data in data centres located outside the EEA.

Marketing

We will not use your personal data to send you marketing communications except in the following circumstances:

You have given consent;

You work for a company and we would like to send the company information about our services which we think might be of interest to the company;

You have purchased our services in the past and we would like to send you information about related services, provided you have not opted out from receiving such communications (despite having the opportunity to do so); or

We are sending literature by post.

In all these situations you are able to opt out of receiving further communications.

We don't currently use automated individual decision-making or profiling methods, but we may introduce it in the future. If at any point this is introduced, you will be given the option to opt out.

Security

The security and storage of your personal information is very important to us.

The personal data we collect from you is stored on secure servers, protected through a combination of physical and electronic access controls, firewall technology and other security measures.

We and our data processors have measures in place to guard against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Our business is Cyber Essentials certified and all the payment card processing carried out by Windcave and WorldPay on our behalf is in compliance with PCI DSS.

We do not, however, have any control over what happens between your or your agent's device and the boundary of our information infrastructure and cannot guarantee the security of data transmitted to us which is done at your own risk.

Individuals' Rights Regarding the Personal Data Processed by Us

Under certain circumstances, by law you have the following rights:

Access

You have the right to request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Correction

You have the right to request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Erasure

You have the right to request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to Processing

You have the right to object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Restriction of Processing

You have the right to request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Transfer of Data

You have the right to request the transfer of your personal information to another party.

If you would like to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Finance Director by email at accounts@kemptoncarr.co.uk or by letter at the above address. You will not have to pay a fee to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent to marketing communications, please email your request to marketing@kemptoncarr.co.uk. For other requests to withdraw consent, please contact the Finance Director at accounts@kemptoncarr.co.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Contact

Our nominated representative for the purpose of the Regulation is the Finance Director, Mrs Jane Holmes, who can be contacted by email at accounts@kemptoncarr.co.uk or by letter at Chatsworth House, 29 Broadway, Maidenhead, Berkshire, SL6 1LY.

Complaints

If you have any complaints about the way we use your personal data please contact the Finance Director at accounts@kemptoncarr.co.uk who will try to resolve the issue. If we cannot resolve any issue, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues: www.ico.org.uk.

Changes to the privacy notice and your data

This version was last updated on 18 November 2019.

We reserve the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.

It is important that the personal data we hold about you is accurate and current. Please keep us informed, where relevant, if your personal data changes during your relationship with us.

Appendix A

Visitors to Our Website

By visiting www.kemptoncarr.co.uk you are accepting and consenting to the practices described in this policy.

What information do we collect, hold and process about you?

When you visit our site www.kemptoncarr.co.uk we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy; <http://www.kemptoncarr.co.uk/cookie-policy/>

Why do we collect and process it?

We collect this in order to understand better how our website is being used, which helps us improve its design and our marketing strategy. We may combine this information with personal data you subsequently provide to us if you contact us via the website to help us evaluate our marketing campaigns.

The lawful basis for this processing is that of legitimate interest which is not overridden by your interests or fundamental rights and freedoms.

Third parties with whom we share this information (please also see section in the main body of the privacy notice entitled 'With whom do we share your personal data?')

We use the following data processors to process your data on our behalf: Biostall (host of our website), Google Analytics and Click Dimensions.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Appendix B

Individuals who contact us either via our website or by email, phone, letter or otherwise

This includes people who give us their business cards.

What information do we collect, hold and process about you?

In all but the simplest of telephone exchanges we may collect the following information about you: title, name, address, phone number and email address.

If you are contacting us on behalf of a business, we may also collect the business name and address. We will also process all communications from you by email or post.

Why do we collect and process it?

You may contact us for a variety of reasons eg to ask us to provide a quote, ask a general query, ask about a property we might be advertising to let. We collect your personal data in order to be able to respond to your contact eg send you a quote or details of a property we are marketing, progress an on-going job. Where you have provided a business card, we may contact you to arrange a meeting or discuss our services with you.

If you have not contacted us via our website, we may also, at this point of data capture, email you a privacy notice and ask whether you would like to subscribe to any of our marketing communications.

The lawful bases for this processing are those of:

performance of or the entry into a contract; and

legitimate interest which is not overridden by your interests or fundamental rights and freedoms.

Third parties with whom we share this information (please also see section in the main body of the privacy notice entitled 'With whom do we share your personal data?')

We use the following data processors to process your data on our behalf (this list is not exhaustive):

MyCRM - host our Client Relationship Management system (CRM system)

Microsoft - provide our cloud-based email service

Mimecast - provide our email archiving

Datto - back-up our legacy email system and database

Click Dimensions - provide our e-mail based marketing

AssureSign - provide our on-line document signing solution.

Appendix C

Clients who use our services

What information do we collect, hold and process about you?

You may have provided this to us directly or it may have been provided by an agent on your behalf. In addition to the data we may have collected at the stage of our initial contact with you or your agent, we may also process the following:

- Information required to perform any required anti-money laundering checks for our regulated services:
 - Date of Birth
 - Nationality
 - Country of Residence
 - Supporting information to verify your identity and address
- Outcome of identity searches and anti-money laundering due diligence
- Your agents' details eg those of your lawyer
- Transactional details ie details of services purchased by you and payments made
- Bank details (when we need to make a refund)
- Reports and other documents produced for you which may contain your name

Why do we collect and process it?

We will use this data in order to enter into and perform the contract agreed with you including any required anti-money laundering checks.

We may also use it to send you updates of this privacy notice.

The lawful bases for this processing are those of:

Performance of or the entry into a contract;

Compliance with legal obligations; and

Legitimate interest which is not overridden by your interests or fundamental rights and freedoms.

Third parties with whom we share this information (please also see section in the main body of the privacy notice entitled 'With whom do we share your personal data?')

In addition to the data processors mentioned in the section on 'Individuals who contact us' we may share your data with the following data processors (this list is not exhaustive):

Credit checking agencies – we currently use CreditSafe

Xero – cloud-based accounting system

Chaser – cloud-based debt chasing system

Windcave and WorldPay – for card payment processing

Local authorities –eg if we apply for planning or other permissions on your behalf

Bank - if we make a refund

Appendix D

Agency Applicants

What information do we collect, hold and process about you?

You may contact us about a property we are marketing either via the website, email or phone and we will collect and process your name and contact details as described in the section called 'Individuals who contact us either via our website or by email, phone, letter or otherwise'. We may also obtain this information from Rightmove.

In addition, if you make an offer on a property, we may process the following information:

- Information required to perform any required anti-money laundering checks for our regulated services:
 - Date of Birth
 - Nationality
 - Country of Residence
 - Supporting information to verify your identity and address
- Outcome of identity searches and anti-money laundering due diligence
- Your agents' details eg those of your lawyer
- Documents such as Heads of Terms which may contain your name

Why do we collect and process it?

We will use this data in order to:

Enter into and perform the contract agreed with our client whose property we are marketing including carrying out anti-money laundering checks;
Send you, with your consent, details of other properties which may be of interest to you; and
Send you updates of this privacy notice.

The lawful bases for this processing are those of:

Performance of or the entry into a contract;
Compliance with legal obligations;
Legitimate interest which is not overridden by your interests or fundamental rights and freedoms; and
Consent

Third parties with whom we share this information (please also see section in the main body of the privacy notice entitled 'With whom do we share your personal data?')

In addition to the third parties mentioned in the section on 'Individuals who contact us' we may share your data with the following third parties (this list is not exhaustive):

Credit checking agencies – we currently use CreditSafe
Solicitors – in order to carry out our contract with our client

Appendix E

Individuals who subscribe to receive our marketing communications

What information do we collect, hold and process about you?

You may subscribe to receive marketing communications via our website or when we record your personal details via email and phone. The information we collect is your name, email address and your marketing communications preferences.

Why do we collect and process it?

We use this data to send you marketing communications and the lawful bases for this processing is that of consent. You may unsubscribe at any stage.

Third parties with whom we share this information (please also see section in the main body of the privacy notice entitled 'With whom do we share your personal data?')

We use the following data processors to process your data on our behalf (this list is not exhaustive):

MyCRM - host our Client Relationship Management system (CRM system)

Microsoft - provide our cloud-based email service

Mimecast - provide our email archiving

Datto - back-up our legacy email system and database

Click Dimensions - provide our e-mail based marketing

Appendix F

Tenants/residents of properties we manage

[What information do we collect, hold and process about you?](#)

We may collect the following personal data about individuals who are either tenants/residents in their own right or who work for an organisation that is a tenant:

Title;
Full name;
Permanent residential address and previous address (if you have lived there less than three years);
Telephone contact number(s);
Email address;
Date of birth;
Nationality;
Country of residence;
Financial information about you (e.g. credit score);
Your personal bank details (for refunds);
Agent details ie details of any agent appointed by you to act on your behalf in relation to your tenancy;
Supporting information to verify your identity and address;
Outcome of identity searches and anti-money laundering due diligence;
Name of organisation for which the employee works;
All communications to and from you by telephone, email, post or otherwise.

[Why do we collect and process it?](#)

We process this information to perform the contract we are about to enter into or have entered into with the landlord/resident's association.

The lawful bases for this processing are those of:

Performance of or the entry into a contract;
Compliance with legal obligations;
Legitimate interest which is not overridden by your interests or fundamental rights and freedoms.

[Third parties with whom we share this information \(please also see section in the main body of the privacy notice entitled 'With whom do we share your personal data?'\)](#)

We share this information with the following organisations (this list is not exhaustive):

Microsoft – provides our email service (Outlook)
Mimecast – provides our email archive service
Datto – provides a cloud-based back-up service for data stored on our server
Credit reference agencies – we currently use CreditSafe
Bank (in case of refunds)
Solicitors
Valuers
Insurance providers
Suppliers and contractors who may be required to carry out work at your property
Enforcement agents
Agents selected by you and for whom you have given prior consent for us to share personal information

Appendix G

Current and former employees and workers

What information do we collect, hold and process about you?

We will collect, hold, and process the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date and date when employment or engagement ends.
- Location of employment or workplace.
- Copy of driving licence.
- Recruitment information (including copies of right to work documentation (including passport), references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Compensation history.
- Performance information.
- Disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means such as swipecard records.
- Information about your use of our information and communications systems.
- Photographs.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records.

How do we collect it?

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

Why and how do we process it?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Providing benefits to you.
- Liaising with your pension provider.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or exercise rights in connection with employment.
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our Company pension scheme.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.

- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration.
- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data sharing

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents). The following third parties carry out services on our behalf and may process your personal data:

- NatWest Bank – your bank details are stored on the bank's on-line banking system
- Xero who provide accountancy based services
- HRR Solutions Ltd trading as myHRdept who provide HR services and may prepare HR related letters and processes on our behalf (and if they assist with health related queries they may process or control sensitive personal data relating to you)
- Royal London who provide our pension scheme
- Teamseer – Absence management system
- Xpenditure – Expense management system
- Skyguard who are our lone worker protection provider
- RICS – personal data of qualified staff are stored by RICS
- Compliance Training Products – provide on-line training courses taken by some employees
- Microsoft who provide the Company's cloud-based email platform, 'Outlook', and CRM system
- MyCRM who support our CRM system
- Click Dimensions – platform for sending marketing emails (linked to CRM)
- Mimecast who provide the Company's cloud-based email archive solution

- Datto who provide the cloud-based back up system we use to back up our office server on which documents including payroll records are stored
- Epoq who provide IT services to the Company

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Appendix H

Job applicants

What information do we collect, hold and process about you?

In connection with your application for work with us, we will collect, hold, and process the following data:

- Name, previous experience, qualifications, contact details, details of your qualifications, skills, experience and employment history; information about your current level of remuneration, including benefit entitlements; whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process; and information about your entitlement to work in the UK etc
- If absolutely necessary and relevant to the job, collect, store and use the following “special categories” of more sensitive personal information:

Information about your health, including any medical condition, health and sickness records.
Information about criminal convictions and offences.
- CV and covering letter.
- Information provided by a recruitment agent.
- Any information you provide to us during an interview.
- If applicable the results of any skills based tests.
- Referee details and references.
- All communications from you by email or post.

Why do we collect and process it?

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out reference checks.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

The lawful bases for this processing are those of:

performance of or the entry into a contract;

compliance with legal obligations; and

legitimate interest which is not overridden by your interests or fundamental rights and freedoms.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive information

We will use your particularly sensitive personal information in the following ways:

We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.

Information about criminal convictions

We may, if the role requires it, process information about criminal convictions.

- If necessary, we will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:
 - We may be legally required by a regulated body to carry out criminal record checks for those carrying out certain roles such as working with children or vulnerable adults.
 - Your role may be one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and is also specified in the Police Act 1997 (Criminal Records) Regulations so is eligible for a standard or enhanced check from the Disclosure and Barring Service.
 - The role may require a high degree of trust and integrity as it may involve dealing with high cash value goods, taking cash itself or attending client premises and so we may ask you to seek a basic disclosure of your criminal records history.

Automated Decision Making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data Sharing

Why might you share my personal information with third parties?

Your data will also be processed by the following third party data processors on our behalf:

Microsoft – provides our email service (Outlook)

Mimecast – provides our email archive service

Datto – provides a cloud-based back-up service for data stored on our server

Otherwise, we will only share your personal information with third parties once you have accepted an offer of employment and then only for the purposes of processing your application. This could include arranging a DBS check and collecting references. Once an offer of employment has been accepted, the privacy notice for employees etc. will apply.

Appendix I

Suppliers

[What information do we collect, hold and process about you?](#)

We process the following personal data about sole traders and partners in partnerships who supply us with goods and services:

Name

Phone number

Email address

Address

All communications from you by email or post

Contracts with your name on

Transactional data: ie details of goods and services purchased from you and payments made

Bank details

We also collect the following personal data about employees of companies who supply us:

Name

Phone number

Email address

Address

All communications from you by email or post

Contracts authorised by you with your name on

[Why do we collect and process it?](#)

We use this data to effect the purchase of goods and services.

The lawful bases for this processing are those of:

Performance of or the entry into a contract; and

Compliance with legal obligations.

[Third parties with whom we share this information \(please also see section in the main body of the privacy notice entitled 'With whom do we share your personal data?'\)](#)

We use the following data processors to process your data on our behalf (this list is not exhaustive):

Microsoft – provides our email service (Outlook)

Mimecast – provides our email archive service

Datto – provides a cloud-based back-up service for data stored on our server

Xero – cloud-based accounting system

Bank – for payments to you

Appendix J

Third parties including property owners and occupants, and their representatives, who are connected to the work we are carrying out on behalf of a client

Examples (this list is not exhaustive)

Occupiers (or their representatives) of a property that we are asked to value by a client such as a bank who is not the occupier. The occupiers might be the owners or tenants;

Loan applicants (or their representatives) where we are valuing a property on which the loan is to be secured;

Owners and occupiers (or their representatives) of a property adjoining a property where we are acting as a party wall surveyor; and

Owners and occupiers (or their representatives) of neighbouring properties where we are acting to resolve a boundary dispute on behalf of a client

What information do we collect, hold and process about you?

We process the following personal data about occupiers and their representatives.

Name

Phone number

Email address

Address

If the individual is representing an organisation eg is an employee of a company or a solicitor from a firm of solicitors, we will collect the name and address of the organisation as well.

This information may be provided by the individual themselves or by a third party.

Why do we collect and process it?

We use this data in order to carry out the work we are contracted to perform by our client. An example might be contacting you to arrange an inspection of the property.

The lawful bases for this processing are those of:

performance of or the entry into a contract; and

legitimate interest which is not overridden by your interests or fundamental rights and freedoms.

Third parties with whom we share this information (please also see section in the main body of the privacy notice entitled 'With whom do we share your personal data?')

We also use the following data processors to process your data on our behalf (this list is not exhaustive):

MyCRM - host our Client Relationship Management system (CRM system)

Microsoft - provide our cloud-based email service

Mimecast - provide our email archiving

Datto - back-up our legacy email system and database