

## Bests Estate Agents Privacy Policy Effective May 2018

Bests Estate Agents operates with the highest professionalism and integrity and always take your privacy seriously, we will **Never** sell your personal data. This document provides information on how we use, store and share any information we collect when providing any services to you or your organisation and will continually be reviewed to ensure the highest level of care is taken with any data we collect.

### **Your Personal information:**

In order to provide a high level of service & in keeping with our legal obligations where necessary Bests Estate Agents will need to collect certain information from you, the typical types of data required include but may not be limited to the following:

First Name	Previous Names	Dependents
Surname	Previous Addresses	Primary ID*
Email Address	Residential Status	Address ID*
Current Address	Nationality	Bank/Mortgage Statements*
Proof Of Deposit	Employers Name	Credit Card Statements*
Gender	Phone Numbers	IP Addresses
Estate Agent Details	Solicitors Details	Cookies
Phone Numbers	Mortgage Details	New Property Details

### **Methods of Collection:**

During standard processes to provide a requested service Bests Estate Agents may collect information through the following methods:

- Your Self
- Next of KIN
- Spouse/Family Member/Partner
- Business Associates
- Employers
- Through trusted sources
  - Government / Land & Police registers
  - Credit Agencies
  - Insurance companies
  - Law firms
  - Third party companies sharing your data they have collected

Generally data is directly collected via the use of any of our standard forms, over the internet, email and via telephone conversations or in our branch. We may also collect information via our affiliates and third party partners.

In addition to the above you may choose to submit information directly with us via the following formats:

- through Bests Estate Agents and affiliates websites
- in response to marketing or other communications
- through social media
- by signing up for a product or service
- through participation in an offer, program or promotion
- in connection with an actual or potential business or employment relationship with us

We, our service providers and affiliates may automatically collect certain information such as cookies and web beacons when you interact with advertisements, websites, other digital assets, This information may include: IP addresses browser type, operating systems, referring URLs and information of your activity when engaging with our digital assets. We may also collect information via third party web analytics services (such as Google Analytics), these parties use cookies and web beacons to help us analyse and improve how visitors use our web services.

**Purposes Of Collection:**

Generally, we will collect, use and hold your information for the purposes of:

- Assessing applications for products / services
- Conducting business, developing relationships with Bests Estate Agents and affiliates
  - Process payments / transactions including: Accounting, Authorisation, Clearing, Chargebacks, Auditing, Billing, Reconciliation, Collection, Complaints, Enquiries, Credit Checks and related dispute resolution activities
- Protect against and prevent fraud, unauthorised transactions, money laundering (please see below), tax evasion, claims, other liabilities and manage risk exposure and agent quality, integrity, compliance and security of business processes
- Create and manage any accounts, associated authentication criteria (id's and passwords) you may have with Bests Estate Agents
- Provide, administer and communicate with you about products
- Operate, monitor, evaluate and improve our products, services, websites, mobile applications, other digital assets and business.
- Developing new products and services
- Managing communications, assess effectiveness and optimisation of advertising
- Functionality of our websites, mobile applications other digital assets
- Evaluate your interest in employment and contact you regarding possible employment opportunities
- Comply with industry standards and Bests estate Agents policies

**Anti Money Laundering:**

In addition to help you with a property related service we have to comply with certain regulations for example the “Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to as “the Regulations”). Bests Estate Agents are required to obtain certain information from you to comply with regulations. The information provided will only be used by Bests Estate Agents in relation to complying with the Regulations and will not be shared with any other party outside of the company unless we are required to do so under law. If you decide to enter in to a business relationship with Bests Estate Agents to comply with certain regulations we will require three separate Identification documents from the primary and secondary document lists below even if they appear on both lists. The information may be required at various stages of the process depending whether you are: Purchasing (or Selling).

#### **Primary documents - proof of ID**

- Valid Passport with MRZ
- Valid full UK photo driving licence
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Valid EU/EEA/Switzerland photo driving licence.
- Valid EU/EEA/Switzerland national Identity Card.
- Valid UK Armed Forces ID Card.
- Valid UK Biometric Residence Permit (copy of both sides.)
- Valid Blue disabled drivers pass. (With photo)
- Department for Works & Pensions letter confirming pension details including National Insurance Number dated within the last 12 months.

#### **Secondary documents - proof of residence (home.)**

- Valid full UK photo driving licence.
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Local authority council tax bill (dated within the last 12 months).
- UK Bank / Building societies statements/bills showing activity, dated within the last six months. Including account number and sort code. (Internet printed acceptable.)
- UK mortgage statement (dated within the last 12 months.) (Internet printed acceptable.)
- Utility bill dated within the last 6 months including - Electricity bill (with MPAN number), Landline, Gas, Satellite TV, Water. (Internet printed acceptable.) (Not mobile phone bills.)
- Her Majesty’s Revenue and Customs (HMRC) Inland Revenue (IR) Coding / assessment / statement (dated within the last 12 months) with National Insurance number.
- Department for Works & Pensions letter confirming pension details and NI Number. (Dated within the last 12 months).

We reserve the right to employ third party electronic verification for the purpose of verifying identity. This search will not affect your credit rating.

#### **Lawful Basis of Processing**

Bests Estate Agents processes your information under the following:

- Performance of a contract: where you enter into a contract with us and we need to process your information as part of this contract
- Legitimate interests: some information is processed by Bests Estate Agents as part of its legitimate interests which include :Fraud, risk assessment, due diligence, network and information security, suppressions and managing opting out of communications , profiling , direct marketing, monitoring, web analytics, cloud storage, acquisitions, updating customer details, lettings, sales, financial services and other core products and service provided by the data controller
- Public interest: some information is processed in accordance public interest such as relocations
- Consent : where we process information under consent we will seek you clear and unambiguous consent prior to processing your data

#### **Who we share your information with:**

We do not sell or otherwise share your personal information we collect from you except as described in this privacy policy or as indicated when consent is given when data is received. We share information collected with, but not limited to:

- Trusted affiliates/partners such as solicitors, mortgage brokers, lenders, surveyors, EPC assessors, contractors.
- Formally contracted service providers: Hosting data centres, cloud service, office management system providers.

The above parties are contractually required to safeguard the privacy and security of your personal data that they process on our behalf and authorise them to use or disclose information necessary to perform services on our behalf or to comply with legal requirements.

- Councils
- Credit agencies, Her Majesty's Revenue and customs (HMRC), National Crime agency and other regulatory bodies.
- Additionally we may share information about you if required legally to prevent harm, financial/reputation loss, for investigation of suspected/actual fraudulent or illegal activities.
- Prospective employers seeking references for new employment

You may interact with services provided by partner parties which may include social networking, advertising companies etc, who may use or share your personal data in accordance with their own privacy policies, Bests Estate Agents recommends in these circumstances you review the parties own privacy policies if you interact with these features.

Bests Estate Agents reserve the right to transfer your personal information during any sale or acquisition of our business, with reasonable effort taken to ensure the acquiring parties protect/use your personal data in accordance to the terms set out in this privacy statement.

### **How long do we keep your data for:**

We will retain data for a reasonable amount of time in order to perform the purposes listed above. We retain data on average for 7 years from last contact to meet our legal requirements, Bests Estate agents to reserve the right to retain data for longer than this in the legitimate interested of Bests Estate Agents.

### **Data Storage and transfer:**

We may store or transfer data collected about you to countries outside of the country where the data was taken, these countries may not operate under the same data protection laws as the country in which you provided the information, when data is transferred we will protect it as set out in this privacy document. Bests Estate Agents use cloud storage facilities provided by Dropbox who's servers are hosted in the USA. More information in regards to Dropbox can be found here [www.dropbox.com](http://www.dropbox.com)

### **Your rights and choices:**

Your rights in regards to the personal or sensitive information we hold about you enable you the right to choose what information we collect from you, how we use that information and how we contact you.

#### **Access and Correction:**

You may have the right to:

- Confirm that we hold information about you.
- Request access to any information we hold about you
- Request copies of personal information held.

To access these rights please follow the steps below.

#### **Update or correct information we hold on you:**

Should you feel the information we hold about you may be incorrect/inaccurate you can contact us outlining the area of information you would like to corrected. If we refuse to amend any personal information we will provide notice outlining the reasons why (unless it would be unreasonable to provide these reasons) and provide you with the means to make a formal complaint

#### **Object to the processing of your information:**

Should you feel you would like to object to the processing of your personal information please contact us outlining what processing of data you object to. You can find how to contact us in this regard under the "how to contact us" section below.

#### **Opting out of processing:**

At any time you can opt out of the collection of your information via automatic means e.g visiting our website. Your browser should provide means to opt out of certain types of cookies, however this may alter the performance of our website. Our cookies policy can be found in the footer of our

website. You can at any time tell us not to send communication to you by clicking the “Manage your communication preferences” link in the footer of the email you have received or by emailing [terry@bests.co.uk](mailto:terry@bests.co.uk) / [alex@bests.co.uk](mailto:alex@bests.co.uk)

**Withdrawal of Consent:**

if we have obtain information by consent you have the right to remove this consent you have previously supplied. If we process your information under our legitimate interest you can object at any time on legitimate grounds to the processing of your information.

**Your right to be forgotten, deleted or anonymised:**

At any time you have the right to request any personal information we hold on you to be forgotten, deleted or anonymised, if you wish to exercise this right please contact us by the methods outlined in the “how to contact us” section below.

**How to contact us:**

if you would like to make a complaint about a breach of your personal data, concerns over this privacy policy or would like to access/update information or preferences you provided to us please contact us as outlined below:

**email us:**

[terry@bests.co.uk](mailto:terry@bests.co.uk) | [alex@bests.co.uk](mailto:alex@bests.co.uk)

**Phone:**

01928 576368

**Write:**

Bests Estate Agents

62 High St

Runcorn

WA7 1AW