

PRIVACY POLICY

Information You Provide to Us

Your privacy is important to us. By providing personal information such as your name, e-mail address and telephone number via the forms on this website, you agree to us contacting you with regard to the information you request.

Some forms on our website also include a check box asking you for permission for us to add you to our mailing list. This is an opt-in mailing list and your personal information will be used solely by us. Under no circumstances will your personal information be sold, rented, shared, or gifted to any other organisation without your explicit consent unless we are under a legal obligation to share that information (i.e. prevention of fraud or right to rent checks).

From time to time, we may include links in our e-mails to other websites which we think may be of interest to you. Each email communication you receive from us will have the option to remove your e-mail address from our list.

In our role as property sales and letting agents – and to comply with our legal and regulatory obligations, we may also need you to provide us with the following information:

- Name
- Biometric status
- Previous name
- Date of birth
- Residential address: current and past
- Contact details, such as email addresses and phone numbers
- Employment details
- NI Number
- Number of dependents, dependents age,
- Bank statements
- Address ID
- Primary ID
- Pay slips
- Self-employed accounts
- Employers name and contact information
- Gender
- Personal debt details
- Solicitor details
- Estate agent details
- Mortgage details
- Proof of ownership
- Proof of funds
- Marital status
- Salary
- Accountant information
- Bank Details

How we collect this data from you:

- When you apply for our products and services
- When you talk to us on the phone or in the branch
- When you use our websites, mobile device apps, web chat
- In emails and letters
- In financial/property reviews and interviews

Information We Monitor about Visitors

During the course of any visit to our website, the pages you see, along with a short textfile called a 'cookie', are downloaded to your computer. Many websites do this, because cookies facilitate useful features such as the ability to identify whether a user has successfully logged into the site or to find out whether the computer (and probably its user) has visited the website before.

Legal Basis for Personal Data Processing

Article 6 of GDPR requires that the lawfulness of data processing be advised. Constables uses "legitimate interests" as the basis for the secure processing and storage of its customer data in order to deliver a service to them. This includes the communication of direct marketing information related to our services or similar matters.

We occasionally communicate with non-customers and will only do so based upon the "explicit consent" which we have been provided with by the data subject, either through a positive confirmation on a web form, or by their communication preferences shared from social media channels or a visit to our offices. We provide clear methods for data subjects to remove or vary their consent if they wish to do so.

Where we are processing special category data as defined in Article 9 of the GDPR, we will secure explicit consent from the data subject in accordance with Article 9 (2).

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Doc Reference:		Last Updated:	31.05.2024 10-07-18
Version Number:	1.1	Copyright:	Constables Cheshire Estate Agents Limited

Legitimate Interest Statement

We have conducted a Legitimate Interest Assessment to support our decision for the lawful basis of processing under Legitimate Interests.

We have considered all stake holders and especially the interest of the data subjects in our processing of personal information and have also commissioned professional independent advice.

If you would like to discuss the reasoning behind our choices of lawful basis of process you may contact us on info@constablesestateagents.co.uk

Data Controller

Constables Cheshire Limited acts as a Data Controller (as per GDPR Article 24) for (i) the personal data relating directly to its customers and (ii) for its own employee management purposes.

Data Subject Rights

Articles 16-21 of GDPR provide data subjects with several rights in relation to their personal data, including:

- Right of access by the data subject (Art.15)
- Right to rectification (Art.16,19)
- Right to erasure (Art.17,19)
- Right to restriction of processing (Art.18)
- Right to data portability (Art.20)
- Right to object to processing (Art.21)

Where Constables Cheshire Limited is acting as Data Controller (see above), then it will receive, validate, record, progress and respond to any such data subject requests received.

Should a data subject decide to exercise their rights, they should contact Constables Cheshire Limited as indicated below.

Declaration of Processors and Sub-Processors

Constables Cheshire Limited confirms its use of:

- HM Revenue & Customs, regulators and other authorities
- UK Financial Services Compensation Scheme
- Credit reference agency UK Tenant Data which is the trading name of IFAQS Limited which in turn is an appointed representative of Albany Park Limited which is authorised and regulated by the Financial Conduct Authority
- Fraud prevention agency ActionFraud - the UK's national fraud and cybercrime reporting centre (<https://www.actionfraud.police.uk/>)
- Organisations that introduce you to us (web portals like rightmove.co.uk for example).
- Companies that we introduce you to with your consent such as;
- Independent Financial Advisors
- Companies you ask us to share your data with.
- Contractors such as plumbers, electricians, builders, gas engineers
- Utility companies
- Landlords-in relation to the relevant tenancy /application only
- Tenants- in relation to the relevant tenancy /application only
- Local Authority Council tax departments
- Navigate IT Limited which provides us with our IT hardware and software infrastructure.

Constables Estate Agents Ltd confirms that it has undertaken applicable due diligence and validation on each of the declared processors and sub-processors to ensure that they are aware of and able to deliver their applicable obligations under the General Data Protection Regulation.

ICO

Constables Cheshire Limited is registered with the Information Commissioner's Office – registration number ZA556922 applies.

If a Constables Estate Agents customer or data subject believes that Constables Estate Agents has not delivered upon its obligations under GDPR, they have a right to make a complaint to the ICO. They can be reached by telephone on 0303 123 1113 or by using the contact form on their website.

Contact: Constables Cheshire Limited
Data Protection Manager
Constables Cheshire Limited
21 High Street
Neston CH64 9TZ
Tel: 0151 353 1333
Email: info@constablesestateagents.co.uk

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