

PUGHS ESTATE AGENTS & VALUERS

Privacy Notice

General Data Protection Regulation (GDPR)

What this privacy notices covers

Pughs Estate Agents & Valuers “Pughs” are committed to protecting your personal information. In this notice, references to ‘we’, ‘us’ or ‘our’ mean **Pughs**. This notice explains how we collect and use the personal information about you.

Who we are

Pughs is a firm of Estate Agents and Valuers regulated by the Royal Institution of Chartered Surveyors, is a member of the National Association of Estate Agents, National Association of Residential Letting Agents, National Association of Auctioneers and Valuers, the Tenancy Deposit Scheme and the Central Association of Agricultural Valuers.

Pughs is a data controller under data protection legislation and all contact details are shown at the end of this notice.

As an agent, we act in our administration through our Partners and, as relevant, our employees and those of our auctioneers business H J Pugh & Co LLP which has common Partners.

Information we gather

We collect your information in the form of your name and contact details and store it on our agency database and paper files.

Your information is collected from:

- i. application and request forms by post;
- ii. email, post, fax and mail correspondence with **Pughs and H J Pugh & Co LLP**;
- iii. contact via phone;
- iv. in-person contacts with Partners and employees;
- v. information we gathered via auctions and events; and
- vi. information we receive from the internet property portal and external third parties, where relevant.

We will use your information to:

- i. administer your mailing list requirements;
- ii. maintain relevant contact, including, but not limited to: sending you information about properties for sale / to let and requesting tenant references;
- iii. arrange viewings and valuations;
- iv. maintain the accuracy of your information and communicate with you for any other reasons related to your property requirements;
- v. maintain the mailing list;
- vi. share with H J Pugh & Co LLP; and

- vii. share with other regulatory authorities and any other party when sharing of information is required by law.

What is the legal basis of processing your data

The legal bases of processing your data are:

‘contract’, as defined by Article 6 of the General Data Protection Regulations where processing is necessary for the performance of a contract to which the data subject is party.

‘legal obligation’, where processing is necessary for compliance with a legal obligation for example compliance with anti-money laundering legislation and accounting practices.

‘legitimate interest’, where processing is required for maintaining contacts with customers for auctions and to enable conflict of interest checks or to hold data to the other parties to contracts with a client (such as residential tenants).

Who will have access to the information

We share your information with H J Pugh & CO LLP. We may also share your information with third parties (in the case of reference applications, Keysafe Tenant Vetting) and data processors who may need to access your information for performing the purposes specified above.

We may sometimes outsource some of the services set out above to reputable third parties, including for the purpose of ensuring the security of your data. We have data protection compliant agreements in place with all such service providers, so they would only use your information according to our instructions.

We take reasonable organisational and technical measures to protect your information against unauthorised access, modification or misuse. We use services provided by reputable security providers and your information is accessed by employees, agents and third party partners on a needs-only basis.

How long will we keep your information

In the absence of any legal requirements, your personal data will be retained for as long as necessary for the purpose of processing listed above. This means your data will be deleted if you withdraw consent to processing or the data is no longer required or inaccurate. If you decide to cancel your membership or if your membership is lapsed/withdrawn, we will hold your information for a period which is deemed reasonable.

How to keep us updated with any changes to your information

Please remember to keep us updated on the personal data we hold on you if it is inaccurate or incomplete. All requests to update your personal data must be sent in writing to **Pughs** and third parties will be informed, where possible.

Failing to keep us updated with your personal data and contact details may lead to removal of your requirements from our database and you missing out on property purchases / lettings.

Your rights

You have the right to:

- 1) To keep us updated.
- 2) Request a copy of the personal information we hold about you. We require you to prove your identity with two pieces of approved identification. Please submit your request in writing to contact details shown at the end of this notice. We will respond within one month, of receipt of your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records. This request is free of charge unless the request is manifestly unfounded or excessive.
- 3) Have any inaccuracies in your data corrected. If you would like to update the details we hold about you, please contact us on the details set out at the end of this notice.
- 4) Request that we delete your personal data so it is erased from our records.
- 5) Object to certain types of processing such as direct marketing.
- 6) Object to automated processing, including profiling.

Enquiries and Complaints

Please contact us if you have any enquiries arising from this privacy notice. Where possible, please raise all enquires in writing.

If you are unhappy with our work or something that we have done or failed to do, please inform us in writing. We will acknowledge receipt of all complaints and will endeavour to investigate the complaint as soon as reasonably practicable.

All complaints should be sent to:

Mr J D Thomson
Gavel House
Market Street
Ledbury
Herefordshire
HR8 2AQ
Tel 01531 631122 + j.thomson@hjpugh.com

You may also complain directly to the Information Commissioner's Office if you are concerned with how we are handling your personal information. Their contact details are shown below:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF
Tel: 0303 123 1113 or 01625 545745

Website: www.ico.gov.uk

Review of Pughs Privacy Notice

This Notice was last reviewed in March 2018. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us.