



## PRIVACY & LEGAL POLICY

# Fraser & Co



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Privacy policy

Quest Estates Limited T/A Fraser & Co (“We”) are committed to protecting and respecting your privacy.

This policy (and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.fraser.uk.com](http://www.fraser.uk.com) you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the “Act”), the data controller is Quest Estates Limited of Unit 12 West End Quay, 1 South Wharf Road, London W2 1JB.



1 Introduction

Our use of your personal data will be governed by this Privacy Notice.

Fraser & Co is a controller for the personal information that it collects and uses about you. We will treat your personal information as confidential and in accordance with applicable data protection legislation and your personal information will only be shared with others in accordance with this Privacy Notice.

This Privacy Notice explains;

- What personal information is
- How we collect your personal information
- The types of personal information we collect
- How we use your personal information
- The legal basis for processing your personal information
- How we share your personal information
- How long we keep your personal information
- How we keep your personal information secure
- Overseas transfers of your personal information
- Your rights in relation to your personal information
- How to make complaints and how to contact us

If there are any changes to the way in which your personal information is used, this Privacy Notice will be updated.

2 What is personal information

Personal information is any information that tells us something about you. This could include information such as name, contact details, date of birth, bank account details or any information about your needs or circumstances which would allow us to identify you.

Some personal information is classified as “special” data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious beliefs or political opinions and sexual orientation. This information is more sensitive and we need to have further justifications for collecting, storing and using this type of personal information. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data.

3 What personal information do we collect?

We will collect your full name and contact details (such as phone number, email address and postal address) from you whenever you engage with us.

In addition, if we are providing a service to you, or on your behalf, where we are required to do so by law, we will collect information relating to your identity, which will be at least one form of photographic identification (such as a passport, a driving licence or an identification card) and one form of documentation with proof of your place of residence (such as a recent utility bill).

We will also confirm whether you have any relatives or close connections working at Fraser & Co so that we can consider potential conflict of interests and if identified how to manage these, in accordance with our statutory and regulatory obligations

Depending on the service that we provide to you (or on your behalf) we may also collect additional personal information as detailed below;

Buy, Sell, Let and Rent

If you are selling or letting a property through us;

- We will collect a contact telephone number to get in touch with you about organising viewings and updating you on any offers received or rental applications for your property.
- Where you are not the legal owner of the property we will request details from you as to your ability to sell or let the property such as a Power of Attorney, Guardianship Order or Grant of Probate.
- We will collect your bank account details to arrange onward payment of rent due to you

If you wish to rent a property we are listing;

- Specific access requirements so that we can find a property that is suitable for your needs
- Your bank / building / similar account details to allow us to manage an approved tenancy deposit account for you and to set up your rental payments.
- We are obliged under the ‘Right to Rent’ scheme to collect details of your Biometric residence card, your immigration status document and/or your birth certificate to carry out our required checks under this scheme. Details of the biometric residence have to be given by a share code.

If you wish to buy a property we are listing for sale;

- We will collect personal information relating to any specific access requirements you may have in relation to a property so that we can find a property that is suitable for your needs. We will also collect personal information required to source a property for you and, where required, negotiate the purchase of a property on your behalf.



Property Management

Where we engage with you to manage property on your behalf we will ask for additional emergency contact information in case we need to get in touch with you outside of working hours or in the event there is a matter requiring your urgent attention. Where you engage us for portfolio management services we will share your personal information with third party lenders as is necessary to allow us to fulfil our obligations to you and to properly manage and advise you on your property investments.

Investment Management

Where you engage with Fraser & Co Investment Management or one of its subsidiaries as an individual investor we will collect information required to identify you to meet anti-money laundering and counter terrorist financing requirements. If the investor is an entity such as a company, trust or charity, we may need to collect personal information about the controllers and the beneficiaries of the entity.

Other

If you subscribe to receive research, news or other market updates from us, then in addition to the above we will collect details about the sector in which you work and the type of content that you would like to receive.





# 4

## How we use your personal information

What is the legal basis of our data processing?

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so. We rely on the following legal bases to use your information;

- For employment-related purposes
- Where we need information to perform the contract we have entered into with you
- Where we need to comply with a legal obligation

Where the processing is necessary for us to carry out activities for which it is in Fraser & Co’s legitimate interests (or those of a third party) to do so and provided that your interests and fundamental rights do not override those interests, including:

- Processing that is necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns. – this will include sending you marketing information from time to time after you have engaged us to provide services or received services from us either of which may be similar and of interest to you or where you have expressly indicated that you would like to receive such information. You have the right to opt out of receiving this information at any time.
- Processing that is necessary to improve our knowledge of the real estate sector – this will include undertaking market analysis and research so that we better understand trends in the property sector and provide better knowledge along with more tailored and relevant services for our customers in the future.

- Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively – this will include: verifying the accuracy of information that we hold about you and create a better understanding of you as a customer; processing for administrative efficiency purposes such as where we outsource certain administrative functions to third parties who are specialise in such services; processing for network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access or to comply with a request from you in connection with the exercise of any of your rights outlined below.

In more limited circumstances we may also rely on the following legal bases:

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

We may process special categories of personal information and criminal conviction information in the following limited circumstances:

- With your explicit consent, in which case we will explain the purpose for which the information will be used at the point where we ask for your consent.

For specific information on how your personal information will be used for the services you have requested from us, please select from any of the options below;

## Buy, Sell, Let and Rent

We use your personal information for the purposes of fulfilling our obligations to you to let or sell your property or, if you are a buyer or tenant, for the purposes of arranging a contract for sale or a lease for you.

If you are purchasing a property we are acting as agents for the sale of or selling a property through us we will share your personal information with your appointed solicitors and the solicitors acting for the other side of the deal as is necessary to facilitate the sale or purchase.

If you are renting a property we are acting as letting agents or sub agents of, we will share your personal data with third party referencing agencies or the principal agent for the purposes of the prevention and detection of crime, fraud and/or money laundering and checking your suitability to rent that property.

## Property Management

Where we are managing property on your behalf we may need to pass your personal information from time to time on to third party contractors whom we have engaged to carry out maintenance on your properties.

## Finance

We may pass your personal data to an independent mortgage adviser, on a referral basis in relation to the arrangement of financing to allow you to acquire a property and/or the provision of the following services:

- If you are obtaining mortgage brokerage services we will disclose personal information that needs to be submitted to lenders (and if you are a high value mortgage customer, private banks) in order to fulfil our obligations to seek funding options for you;
- If you are an insurance customer we will disclose information to be sent to a selected panel of insurance providers in order to obtain suitable options for insurance products for your requirements.

## Other uses of your personal information

If we sell any part of our business and/or integrate it with another organisation your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their advisers. If this occurs the new owners of the business will only be permitted to use your information in the same or similar way as set out in this privacy notice.

We will share personal information with our regulators, governmental or quasi-governmental organisations, law enforcement authorities and with courts, tribunals and arbitrators as may be required from time to time in order to comply with our regulatory and legal obligations;

Where we use third party services providers who process personal information on our behalf in order to provide services to us. This includes IT systems providers and IT contractors as well as third party referencing or screening agencies for the purposes of the prevention and detection of crime.

We may share your personal information with any person working within the Fraser & Co Group on a need to know basis to ensure we are able to perform our obligations to you.

We will hold your personal information on our client management systems and use this to provide you with marketing information about similar services offered by Fraser & Co to those which you have engaged us to provide which we feel you might find useful from time to time. You have the opportunity to opt out of receiving this information at any time.

## What happens if you do not provide information that we request?

We need some of your personal information to perform the services you have requested from us. For example:

- Where we are selling a property on your behalf we need to know your contact information so that we can update you with information on viewings, offers and the progress of the sale;

- Where you have asked us to find you a property which meets certain access requirements, we may need to know some further details about your particular circumstances so that we can find you a suitable property;
- We also need some information so that we can comply with our legal obligations. For example, we may need identity documents from you to meet our obligations to prevent fraud and money laundering.

If you do not provide the information required for these purposes, we will not be able to perform our contract with you and may not be able to provide services to you or continue to provide certain services to you. We will explain when this is the case at the point when we collect information from you.

# 5

## How we keep your information secure

The security of information is very important to us and we have measures in place which are designed to prevent unauthorised access to your personal information including but not limited to:

- Our client files are stored on our secure client management systems. Access is restricted to our client systems to those within the business who are required to have access to your information for legitimate business purposes.
- Hard copy documentation is stored in locked cabinets.
- All data is hosted in datacentres which have systems and protections in place to protect against both unauthorised access, and other external factors that could cause damage to, your personal data. There are strict access requirements in place and access is restricted to those absolutely necessary.

We ensure access to personal information is restricted to Fraser & Co employees and workers or other persons working within the Fraser & Co Group on a need to know basis. Training is provided to any of those Fraser & Co employees and workers who need access to personal information.

# 6

## Your information and countries outside Europe

We protect your privacy and your rights through the use of the European Commission’s standard data protection clauses.

# 7

## For how long we keep your personal information

The period for which we will keep your personal information will depend on the type of service you have requested from us. The retention period may be longer than the period for which we are providing services to you where we have statutory or regulatory obligations to retain personal information for a longer period, or where we may need to retain the information in case of a legal claim.

Request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need in order to perform our agreement with you and personal information where we are relying on consent to process your personal information.

Object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information; and not be subject to wholly automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights please contact [enquiries@fraser.uk.com](mailto:enquiries@fraser.uk.com)

Fraser & Co policy commitment is applicable to all of our customers, including vendors, buyers, landlords and tenants. As a result, we obtain and hold for a period of at least seven years evidence pertaining to our customers' identity and, where appropriate, we obtain proof of ownership of property and source/destination of funds. We will be unable to proceed with any work on behalf of our customers if we are unable to obtain this information. Customers' identity will be subject to an electronic identity check, which may also include a credit check.

For a full list of acceptable identity documents, please [Click Here](#)

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## Marketing Updates

As a client of Fraser & Co or someone else who has consented receive marketing updates, we may send you from time to time marketing messages by email or post, to keep you aware of what we're up to and to help you see and find our products

PLEASE REMEMBER THAT NO DATA TRANSMISSION OVER THE INTERNET CAN BE GUARANTEED TO BE 100% SECURE. AS A RESULT, WHILE WE STRIVE TO PROTECT YOUR PERSONAL INFORMATION, FRASER & CO CANNOT ENSURE OR WARRANT THE SECURITY OF ANY INFORMATION YOU TRANSMIT TO US AND YOU DO SO AT YOUR OWN RISK. ONCE WE RECEIVE YOUR TRANSMISSION, WE MAKE OUR BEST EFFORT TO ENSURE ITS SECURITY ON OUR SYSTEMS.

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## Access to information

The Data Protection Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information We hold about you.

# 8

## Your rights in relation to your personal information

You have a number of rights in relation to your personal information, these include the right to:

- Be informed about how we use your personal information
- Obtain access to your personal information that we hold
- Request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate
- Request that we erase your personal information in the following circumstances: (1) If Fraser & Co is continuing to process personal information beyond the period when it is necessary to do so for the purpose for which it was originally collected (2) If Fraser & Co is relying on consent as the legal basis for processing and you withdraw consent (3) If Fraser & Co is relying on legitimate interests as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us continue with the processing (4) If the personal information has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation) (5) If it is necessary to delete the personal information to comply with a legal obligation

Ask us to restrict our data processing activities where you consider that:

- Personal information is inaccurate
- Our processing of your personal information is unlawful
- Where we no longer need the personal information but you require us to keep it to enable you to establish, exercise or defend a legal claim
- Where you have raised an objection to our use of your personal information

# 9

## Sharing your information

We do not, and will not, sell any of your personal data to any third party - including your name, address, email address or credit card information. We want to earn and maintain your trust, and we believe this is absolutely essential in order do that.

We may provide data analytic companies with aggregated but anonymised information and analytics about our customers and, before we do so, we will make sure that it does not identify you.

# 10

## Anti-Money Laundering

Fraser & Co is committed to operating its business in a transparent and open manner consistent with our legal and regulatory obligations. We are aware that the real estate industry is a target for organised criminals seeking to launder the proceeds of criminal activity. We always seek to prevent this activity by cooperating fully with the authorities and reporting suspicious activity to the National Crime Agency.

As part of this commitment, we adopt a strict compliance of all Anti-Money Laundering rules, with specific emphasis on the Proceeds of Crime Act 2002, the Money Laundering Regulations 2017, the Bribery Act 2010 and the Terrorism Act 2000.

## How to stop marketing messages from Fraser & Co:

You can stop receiving marketing messages from us at any time.

You can do this:

- By clicking on the 'unsubscribe' link in any email or by emailing [unsubscribe@fraser.uk.com](mailto:unsubscribe@fraser.uk.com).
- Once you do this, we will update your profile to ensure that you don't receive further marketing messages.

Please note that, as Fraser & Co comprises a complex web of many inter-connecting services, it might take a few days for all our systems to be updated, so you might get messages from us while we process your request.

## What else should I know about my privacy?

Please keep in mind that whenever you disclose Personal Information online - for example on message boards, through email, or in chat areas - that information can be collected and used by others. In short, if you post Personal Information online that is accessible to the public, you may receive unsolicited messages from other parties in return.

# 14

## Changes to our privacy policy

Any changes We may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Fraser & Co, Unit 12 West End Quay, 1 South Wharf Road, London W2 1JB or [info@fraser.uk.com](mailto:info@fraser.uk.com)

# CONTACT

To find out more about the latest market updates from Fraser&Co, please contact:

Member of:



## Paddington Office

Unit 12, West End Quay  
1 South Wharf Road  
London W2 1JB  
Tel: +44 (0)20 7723 5645  
Email: [paddington@fraser.uk.com](mailto:paddington@fraser.uk.com)

## Baker Street Office

189 Baker Street  
London NW1 6UY  
Tel: +44 (0)20 7299 9050  
Email: [bakerstreet@fraser.uk.com](mailto:bakerstreet@fraser.uk.com)

## City & Shoreditch Office

47 Great Eastern Street,  
London, EC2A 3EP  
Tel: +44 (0)20 7708 6869  
Email: [city@fraser.uk.com](mailto:city@fraser.uk.com)

## Kew Bridge & Brentford Office

571 Chiswick High Road  
London W4 3AY  
Tel: +44 (0)20 8747 0661  
Email: [kewbridge@fraser.uk.com](mailto:kewbridge@fraser.uk.com)

## Colindale Office

5 Charcot Rd,  
London NW9 5HG  
Tel: +44 (0)20 8200 3070  
Email: [colindale@fraser.uk.com](mailto:colindale@fraser.uk.com)

## New Homes

Unit 12, West End Quay  
1 South Wharf Road  
London W2 1JB  
Tel: +44 (0)20 7723 1284  
Email: [newhomes@fraser.uk.com](mailto:newhomes@fraser.uk.com)

## Land and Investments

47 Great Eastern Street,  
London, EC2A 3EP  
Tel: +44 (0)20 7708 6869  
Email: [city@fraser.uk.com](mailto:city@fraser.uk.com)

## Property & Block Management

Unit 12, West End Quay  
1 South Wharf Road  
London W2 1JB  
Tel: +44 (0)20 7723 5645  
Email: [management@fraser.uk.com](mailto:management@fraser.uk.com)

## Mill Hill East Office

Plaza Collection Sales Suite  
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London NW7 1BS  
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Email: [info@fraser.uk.com](mailto:info@fraser.uk.com)

Associated offices in Hong Kong,  
Singapore and Dubai



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VISIT WEBSITE

