

# Privacy Policy

## INTRODUCTION

Regents Residential Limited ("We") is a Data Controller 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 this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of our website. If you do not accept and agree with this Privacy Policy you must stop using our website immediately.

This website is not intended for children.

This Privacy Policy was last amended in May 2018 and it supersedes any previous version.

## INFORMATION ABOUT REGENTS RESIDENTIAL

Our website is owned and operated by Regents Residential Limited, a private limited company registered in England under company number 07822929. We are a member of The Property Ombudsman Redress Scheme.

Our registered address is Ramon Lee Ltd, 93 Tabernacle Street, EC2A 4BA.

Our main trading address is 3 Devonshire Street, Marylebone, London W1W 5DT

Our VAT number is: 136 3848 96

## WHAT IS PERSONAL DATA?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can ask us to rectify or update your personal information at any time.

## DATA WE COLLECT FROM YOU

As a business we collect, use, store and transfer different types of personal data to carry out our services, which you agree to supply us as accurate.

If you are buying, selling, renting or letting a property through Regents Residential we will

need to collect personal data from you when you engage with us which may include some or all of the following:

- Identity Data i.e. your full name, title, marital status and gender.
- If you are a tenant renting under the 'Right to Rent' scheme we will 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.
- If we are providing a service to you and where we are required to do so by law, we will collect information relating to your identity to meet anti-money laundering and counter terrorist financing requirements, which will be at least one form of photographic identification (e.g. a passport, a driving licence or an identification card) and one form of official documentation with proof of your place of residence (e.g. a recent utility bill).
- If the Client is a company, trust or charity, we may need to collect personal information about the controllers and the beneficiaries of the entity.
- Contact Data i.e. your telephone numbers, email address and current/previous addresses and registered address if a company.
- Employment Data i.e. your employer's name, profession and job title.
- Financial Data i.e. your bank account details and payment information (i.e. credit cards).
- Legal Data - where you are not the legal owner of the property we will request details of your authority to sell or let the property such as a Power of Attorney, Guardianship Order or Grant of Probate.
- Marketing and Communications Data - your marketing preferences from us and third parties, feedback and survey responses and your communication preferences.
- Personal Interest Data i.e. your confirmation will be required to confirm whether you have any relatives or close connections working at Regents Residential so that we can consider potential conflict of interests and if identified how to manage these, in accordance with our statutory and regulatory obligations.
- Professional Services Data i.e. your accountant, solicitor, mortgage company, mortgage broker, HMRC Non-Resident Landlords Scheme (where applicable)
- Property Data i.e. your specific property requirements and access needs in relation to a property in order to find a property that is suitable. We will also collect personal information required to source a property for you and, where required, negotiate terms on the property on your behalf.
- Staff Data i.e. your name, address, payroll data, national insurance no, CV,

- Transactional Data - details about payments to and from you and other services you have purchased through us.

## **DATA THAT WE COLLECT FROM OTHER SOURCES**

We obtain data about you from publicly available sources such as the Land Registry, social media platforms, blogs, internet postings or referral agents etc.

## **PROPERTY MANAGEMENT**

Where we are managing 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. 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.

## **OUR USE OF YOUR DATA**

In order to provide an efficient service we need to collect and use your personal data in order to fulfil our obligations to you. We only use your personal data for the purpose for which it was collected which include providing our products and services, to keep our records updated and to grow our business.

If we need to process your personal data for another reason other than the original intended purpose, we will let you know. We may process your personal data for a different purpose and without your consent where it is necessary for us to comply with our legal obligations.

- To allow us to provide you with Estate Agency Services
- Helping you to sell or buy a property
- To value your property
- To register you as a Seller, Buyer
- To share your data with solicitors when buying or selling a property
- To register you as a Landlord or Tenant
- To share your data with 3rd party referencing agency
- To provide customer support
- To protect a Tenant's deposit registering it with a deposit protection scheme.
- To arrange an Energy Performance Certificate
- To arrange a gas Safe Certificate and/or boiler service
- To arrange a Legionella risk assessment
- To arrange
- Communicating with you by email or telephone calls or text/messaging with information and news
- Supplying our new products and services to you and carrying out obligations from contracts
- Providing information on other services and goods from us which may be of interest

- Process payment for purchases or services
- Allow you to participate in social sharing on our website
- Court order or order legal enforcement
- To recruit new talent
- To manage our Employees

## **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 where we collect information from you.

## **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 on 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 Regents Residential employees and workers or other persons working within the Regents Residential Group on a need to know basis. Training is provided to any of those Regents Residential employees and workers who need access to personal information.

## **HOW LONG DO 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.

## **YOUR LEGAL RIGHTS**

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

- be informed about how we use your personal information
- obtain access to your personal information that we hold (commonly referred to as subject access request)
- request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate
- request that we erase your personal information if:
  - the personal data is no longer necessary for the purpose which we originally collected or processed it for
  - we are relying on consent as our lawful basis for holding the data and you withdraw your consent
  - we are relying on legitimate interests as our basis for processing, you object to the processing of your data and there is no overriding legitimate interest to continue this processing
  - we are processing the personal data for direct marketing purposes and you object to that processing
  - we have processed the personal data unlawfully
  - we have to do it to comply with a legal obligation
- ask us to restrict our data processing activities in certain circumstances
- obtain and reuse your personal data for your own purposes across different services
- stop your data being used for direct marketing. Where you refuse marketing, we will still contact you to discuss the services you have asked us to provide to you or to tell you about changes to our terms and conditions.

## **OTHER USES OF YOUR PERSONAL INFORMATION**

We will share personal information with our regulators, governmental and 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.

We engage third-party service providers to perform a variety of business operations on our behalf. In so doing, we may share your personal information with them. We provide our service providers with only the personal information they need in order to perform the services we request, and we contractually require that they protect this information appropriately and not use it for any other purpose. For example, we may rely on a 3rd party service provider to:

- Arrange delivery of purchased items
- Payment processing
- IT companies who host our sites and deliver our email or other communications
- referencing or screening agencies for the purposes of the prevention and detection of crime

## **MARKETING**

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message/messaging and/or post with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

If you wish to withdraw your consent for Regents Residential to use your personal data for marketing purposes, you may do so at any time. If you do withdraw your consent, this will result in us ceasing to market goods and services to you.

If you do withdraw your consent to receiving marketing messages, we will still process your personal data in order to fulfil our contract with you and in accordance with our legal, accountancy and regulatory obligations.

## **THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any company outside the Regents Residential Group of companies for marketing purposes.

## **HOW TO STOP MARKETING MESSAGES FROM REGENTS RESIDENTIAL**

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@RegentsResidential.com](mailto:unsubscribe@RegentsResidential.com)

Once you do this, we will update your profile to ensure that you do not receive further marketing messages.

Please note that, as Regents Residential 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.

### **LINKS TO THIRD PARTY WEBSITES & SOCIAL MEDIA**

We may provide links on our website from time to time to third party websites and social media. Regents Residential has no control or responsibility on such websites and we encourage you to read the privacy policy of the website before using.

### **CHANGE OF BUSINESS OWNERSHIP AND CONTROL**

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.

### **COMPLAINTS AND FEEDBACK**

If you require further information about how we process your personal data please contact our Data Protection Officer in the first instance by email: [info@RegentsResidential.com](mailto:info@RegentsResidential.com) or by writing to:

The Data Protection Officer, Regents Residential, 3 Devonshire Street, Marylebone, London W1W 5DT

You can complain to the Information Commissioner's Office which is the UK's independent authority set up to uphold information rights in the public interest.

### **CHANGES TO OUR PRIVACY POLICY**

Regents Residential reserves the right to change our Privacy Policy from time to time as necessary or as required by law. Any changes will be immediately posted on this page and you will be deemed to have accepted the term of this Privacy Policy on your first use of our website following the alterations.