Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR) and we are responsible as 'controller' of that personal information for the purposes of this law.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	LONDON RESI LTD trading as Robertson Smith & Kempson, Robertson Smith & Kempson Estate Agents.Agents
Team responsible for data protection compliance (we have no 'DPO' within the meaning of GDPR)	Data Compliance Team, 3 Park Road Teddington TW11 0AP
Personal information	Any information relating to an identified or identifiable individual

Personal information we collect about you

We may collect and use the following personal information about you:

- Your name and contact information, including email address and telephone number and company details if applicable
- Information to enable us to check and verify 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)
- Your gender information, if you choose to give this to us
- Your billing information, transaction and payment card information
- Your professional or personal online presence, e.g. LinkedIn profile, if you share it with us
- Your contact history, transaction and instruction history with us
- Your Right to Rent status, nationality and immigration status and information from related documents, such as your passport or other identification, and immigration information, e.g. if you are a potential tenant applying for a tenancy
- Information to enable us to undertake Anti Money Laundering and Terrorist Financing electronic checks on you
- Information about how you use our website, IT, communication and other systems
- Your responses to surveys, competitions and promotions
- Information specific to your requirements relating to the property you are looking to buy or rent through our services which may include us sending you properties' details to help with your search
- Information to enable our landlords to grant a tenancy to a prospective tenant, such as previous rental history, employment status and affordability

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

This personal information is required to provide our services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing services to you.

How your personal information is collected

We collect most of this personal information directly from you—in person, by telephone, text or email and/or via our website. However, we may on rare occasions also collect information from publicly accessible sources, e.g. Companies House or HM Land Registry or internet search engines.

We may also collect information from other publicly accessible sources such as:

- Directly from a third party, e.g.:

– Sanctions screening providers;

– Credit reference agencies;

– Customer due diligence providers;

- From cookies on our website—for more information on our use of cookies, please see our cookies policy

How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our **legitimate interests** or those of a third party; or
- Where you have given consent

We use your personal information under the **legitimate interest** basis for using and processing. **Legitimate interest** may be used as a basis for processing when we have a business or commercial reason to process your information, so long as this is not overridden by your own rights and interests.

When we use and process your personal information for our **legitimate interest**, we will consider and balance any potential impact on you and your rights under data protection and any other relevant laws. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your valid consent or are otherwise required or permitted to by law).

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use personal information for	Our reasons
To provide services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Robertson Smith & Kempson	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, range of services or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products

What we use personal information for	Our reasons
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services to: - Existing and former customers; - Third parties who have previously registered with us or expressed an interest in our services; - Third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e. the processing is necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns. This may include sending you marketing information from time to time after you have engaged our services or received services from us either 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
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

We do not collect use or process special category personal information, such as racial or ethnic origin, political opinions, religious beliefs, trade union membership, Genetic and biometric data, Data concerning health, sex life or sexual orientation.

Marketing communications

We may use your personal information to send you updates (by email, telephone calls, SMS or post) about our services, including exclusive offers (mainly for free market appraisal of your property), or highlighting of current market trends and properties on the market that may be of interest to you.

We have a legitimate interest in processing your personal information for marketing purposes (see above **'How and why we use your personal information'**). This means we do not usually need your consent to send you marketing communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and **never sell or share it with other organisations for marketing purposes.**

You have the right to opt out of receiving promotional communications from us at any time by:

- Contacting us by post at 3 Park Road Teddington TW11 0AP (Att: Customer Relations Team) or by telephone at 020 8614 6165; or
- Using the 'unsubscribe' link in marketing emails: this will unsubscribe you from marketing communications but you will still be able to receive property details if you are an applicant buyer or tenant (subject to a separate unsubscribe option).

Who we share your personal information with

We routinely share personal information with:

- Third parties we use to help deliver our services to you such as:,

– Payment service providers

– Tenants vetting companies carrying out change to referencing checks on our behalf

– Electronic identity search providers

– Maintenance contractors for managed properties

– Property inventory providers

- Third parties we recommend to you, and approved by you to deliver services directly to you such as:

– Solicitors and conveyancers

– Mortgage brokers and financial advisors

– Removal companies

– Surveyors

- Other third parties we use to help us run our business, such as website suppliers, case management system providers and email services suppliers;

- Third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;
- Other third parties such as credit reference agencies and our banks;
- Block managers, managing agents, landlords or superior landlords;
- Sellers, once a sale has been agreed on a property;

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers (where possible) to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or company, or during re-structuring. The recipient of the information will be bound by confidentiality obligations.

Where your personal information is held

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal information with').

How long your personal information will be kept

We will keep your personal information while you have an active matter with us or we are providing services to you. We will keep your personal information, as a minimum, for as long as necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly;
- To keep records required by law.

and thereafter

- 6 years from any last communication with you for marketing of our services to you as detailed above under 'How and why we use your personal information' and under 'Marketing communications'.

We will not retain your personal information for longer than necessary for the purposes set out in this policy.

Transferring your personal information out of the European Economic Area

We do not transfer your personal information outside of the UK.

Our various third party service providers may transfer such personal information as held by them outside of the UK and the EEA. Where the countries to which your personal information is transferred do not offer an equivalent level of protection for personal information to the laws of the UK, we will ensure that such third party service providers have used one of these safeguards:

- Transfer it to a non-EEA country that has received an 'adequacy decision' from the European Commission. This means that country has privacy laws that give the same protection as within the EEA.
- Put in place the EU Commission's 'standard contractual clauses' with the recipient. This means that they must protect it to the same standards as organisations within the EEA.
- Transfer it to organisations that have implemented binding corporate rules, which have been approved by an EU supervisory authority.

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations, subject at all times to our legal and regulatory obligations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations

To object	The right to object: - At any time to your personal information being processed for direct marketing; - In certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the UK General Data Protection Regulation.

If you would like to exercise any of those rights, please:

• Email, call or write to us— see below: **'How to contact us'**; and

– Let us have enough information to identify you;

– Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and

– Let us know what right you want to exercise and the information to which your request relates.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

If you have any complaints about the way we use your personal information please contact the Data Compliance Team as per their contact details below and we will try to resolve the issue.

The UK General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority if we cannot resolve your complaint. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy policy was published on 1 May 2026 and last updated on 24 April 2026.

We may change this privacy policy from time to time—when we do we will inform you via our website at www.robertsonsmithandkempson.co.uk

How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Data Compliance Team,
3 Park Road, Teddington, TW11 0AP
datacompliance@robertsonsmithandkempson.co.uk
020 8614 6165