



## PRIVACY POLICY

Stanley Wright is a Rural Property Consultancy and Chartered Surveyors providing comprehensive advice to property owners across a range of services. Our core business is the day-to-day management of traditional country estates, where we act for landlords who own tenanted farms, let houses and cottages, undertaking all the duties that come with property ownership.

### 1. Introduction

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

Stanley Wright 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;

1. What personal data is
2. How we collect personal information
3. The types of personal information we collect
4. The lawful basis for processing your personal information
5. How we share your personal information
6. What happens if you do not provide information we request
7. How long we keep your personal information
8. How we keep your personal information secure
9. Your rights in relation to your personal information
10. How to make a complaint or contact us

### 1. What is personal data?

Personal data is any information that tells us something about you. This includes 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 data is classified as “special data” under data protection legislation. This type of data could create more significant risks to a person’s fundamental rights and freedoms. For example, by putting them at risk of unlawful discrimination. This includes information relating to race, ethnic origin, politics, religion, genetics, health, sexual orientation and criminal convictions. We will only collect and use these types of information if the law allows us to do so.

## **2. How we collect personal information**

We collect personal information in the following ways;

- When you give it to us directly
- From third party organisations
- From publicly available records

## **3. The types of personal information we collect**

Personal Data means any information about an individual from which that person can be identified. We collect personal information because it helps us run our business and provide services to our customers.

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.

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).

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, Rent**

#### **If you are selling or letting a property through us;**

- We will collect identification and contact information, such as your full name, date of birth, age, postal address, email address and telephone numbers
- 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.

#### **Renting a property;**

- Identification and contact information, such as your full name, date of birth, age, postal address, email address and telephone numbers.
- One form of photographic identification (such as a passport, a driving license or an identification card) and one form of documentation with proof of your place of residence (such as a recent utility bill) for each tenant
- Information about your employment and income, including your employment status, national insurance number, salary, job title.
- Your next of kin and emergency contact details, and information about any others living with you.
- Your bank / building / similar account details to allow us to make payments to an approved tenancy deposit provider, to set up your rental payments and deal with service charge and insurance payments, utility recharge payments and any other tenancy payments
- Specific access/health requirements to help us match you to a property or assess whether a property is suitable for your needs

## **References and other information included as part of the application process may include;**

- Financial information, such as your bank account details, payroll records, tax status information
- Information about any outstanding debt decrees and county court judgments against you
- Information about bankruptcy, voluntary arrangements and other insolvency proceedings
- More sensitive information about you, including information about your previous criminal convictions and health information

We may also collect information about you from third party referencing agencies for the purposes of checking your suitability to rent a property, for the prevention and detention of crime, fraud and or money laundering to provide our services. In doing so we may share information about you. We provide third parties with only the personal information they need to perform the services we request.

## **Contractors**

If we employ you as a contractor or you provide services to us and/or our clients we will collect and process identification and contact information such as your full name, postal address, email address, telephone numbers, insurance and compliance certificates and evidence of industry and service related qualifications.

## **Employees**

If you are an employee of Stanley Wright we will collect and process identification and contact information, such as name, address, contact numbers, date of birth, email address, bank account details, NI numbers, pension contribution details, emergency contact information, performance information, sickness absence information and salary information.

If you apply for a job with Stanley Wright the information we will collect will include your name, contact details, work history, education history, professional qualifications, references, results of pre-employment screening such as criminal records checks as permitted under law, and any other information you provide directly related to your application.

## **4. The lawful basis for processing your personal information**

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

- Contract – where we need information to perform the contract we have with you.
- Legal Obligation – where we process and share some information because it is necessary to comply with laws and regulations to do with running of our business.
- Consent – where the provision of information will be done when you have consented to the processing of your personal data for one or more specific purposes.

In general, we only rely on consent as a legal basis for processing personal data in relation to sending direct marketing communications via email or post. You have the right to withdraw consent at any time. Where consent is the only legal basis for processing, we will cease to process data after consent is withdrawn

## **5. How we share your personal information**

Where we are managing your property, or you are renting a property from us, we may need to pass your personal information to third party contractors engaged to perform a service on your/our behalf.

Where we use third party service providers to process personal information on our behalf to provide service to us. This includes IT systems providers and IT contractors and third part referencing agencies.

We will share personal information with regulators, government authorities, law enforcement authorities, courts, tribunals and arbitrators as may be required by to comply with our regulatory and legal obligations.

## **6. What happens if you don't provide the information we request**

We need some of your personal information to perform the services you have requested from us. For example, if you are enquiring about renting a property from us we need to know your contact information to update you with information about viewing dates and rental agreements.

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.

## **7. How long we keep your personal information**

We will only retain your personal information for as long as necessary in relation to the purpose we collected it, including to satisfy any legal, or reporting requirements. Retention periods will be judged on a case by case basis. By law, for tax and other purposes, we must keep basic information about our customers (including contact, identity, financial and transaction data) for 7 years after they cease being customers. We may need to retain information to comply with legal obligations, such as, to evidence a contract or prevent fraud.

For unsuccessful job applicants we will retain information for 1 year to demonstrate a fair recruitment process.

## **8. How we keep your personal information secure**

We take the security of information very seriously and have measures in place which are designed to prevent unauthorised access to your personal information. These include, but are not limited to:

- Client files are stored on our secure client management systems. Access to our client systems is restricted 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
- Internally-held data is secured behind a company firewall which does not allow access to external third parties.
- All information 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 with an absolute necessity to access the data.
- We ensure access to personal information is restricted to Stanley Wright employees and contractors or other person working with Stanley Wright on a need to know basis. Training is provided to any of those Stanley Wright employees and workers who need access to personal information.

## **9. Your rights in relation to your personal information**

You have a number of rights, including the right to

- be informed about how we use your personal information (the right of information)
- obtain a copy of personal information that we hold about you (the right of access)

- ask us to update and correct any out-of-date, incomplete or incorrect personal information that we hold about you (the right of rectification);
- to request (in certain circumstances) that we delete personal data held on you where we no longer have any legal reason to retain it (the right of erasure or to be forgotten)
- the right to opt out of any marketing communications that we may send you and to object to us using / holding your personal data if we have no legitimate reasons to do so (the right to object)
- the right (in certain circumstances) to ask us to ‘restrict processing of data’; which means that we would need to secure and retain the data for your benefit but not otherwise use it (the right to restrict processing); and
- the right (in certain circumstances) to ask us to supply you with some of the personal data we hold about you in a structured machine-readable format and/or to provide a copy of the data in such a format to another organisation (the right to data portability)

If you wish to exercise any of the above rights, please contact us using the contact details set out below.

#### **10. Complaints and how to contact us**

Stanley Wright employees are required to comply with our Privacy Policy which forbids the disclosure of personal information to parties who do not have a legitimate right to access it. If you wish to raise a query or to complain about we are processing your personal data, you can do so by contacting [enquiries@stanleywright.co.uk](mailto:enquiries@stanleywright.co.uk)