

Data Protection Privacy Notice

At Davies Harrison we are committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information and people, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time. The most up to date Policy document can be found on our website.

Any questions regarding this Policy and our privacy practices should be sent by email to info@daviesharrison.com, by writing to Davies Harrison, The Mission, 2nd Floor, 50 Bridge Street, Manchester, M3 3BW or by telephoning the office on 0161 236 9999.

Who are Davies Harrison?

We are Davies Harrison Limited, a leading North West property consultancy.

Our registered address is The Mission, 2nd Floor, 50 Bridge Street, Manchester, M3 3BW.

We are registered under, and handle personal data in accordance with, the Data Protection Act 1998 and other relevant privacy legislation. Davies Harrison Limited is registered on the Information Commissioner's Office Data Protection Register under number xxxxxx

What type of information is collected from you?

We usually collect information that you willingly provide us with in order to perform services to yourself.

The personal information we collect might include:

- Personal identification data (name, surname, title, date of birth)
- Contact information data (email, telephone number, address, country of residence)
- Images and / or videos from which you may be identified (e.g. CCTV images from our office or from properties you may visit that we are marketing)
- Financial and earnings data (Bank account and profits / remuneration data but not credit card data)
- Medical details where that is relevant to a claim / case / matter
- Details of your education and employment history
- Special categories of personal data in rare circumstances (including race, religion, political interests) only where relevant to our engagement and this will be kept securely aware from other data
- Data required for Money Laundering Checks and other ID checks
- Any other information that you decide to voluntarily share with us (feedback, opinions, reviews, comments, uploaded files, interests, information provided for our due diligence processes)
- Personal data about other named parties to our engagement (eg your spouse or business partners). You must have their authority to provide their personal data and share this Privacy Notice with them beforehand.

Information we may collect from other sources

We may obtain information from agents, solicitors, accountants and other professional advisors who are acting on your behalf.

We may also obtain information available on public registers to facilitate the work we are doing for our clients or perform due diligence on prospective engagements, this may include information from credit reference or fraud prevention agencies, electoral roll, court records of debt judgements and bankruptcies, land registry, Companies House and other publicly available sources.

To the extent permitted by applicable law, we may also obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms and other third parties. For example, depending on your social media settings, if you choose to connect your social media accounts to our accounts, certain data from your social media account will be shared with us, which may include data that is part of your profile.

On what legal basis do we use your data?

We use your data to establish or potentially establish a **contractual relationship** with you or to perform our obligations under a contract.

We use data for our **legitimate interests** where we process data:

- To keep you informed of properties for sale or to rent
- To inform you about the services or activities of the Company

Sometimes we also hold personal information for **legal and regulatory reasons** for instance:

- To comply with tax regulations
- For legal and regulatory required and related disclosures
- For the establishment and defence of legal rights
- Activities relating to the prevention and detection of fraud or crime
- To verify your identity, make credit, fraud prevention and anti-money laundering checks

How is your information used?

We may use your information to:

- Manage and maintain our relationship with you including to carry out our obligations arising from any contracts or engagements entered into with you
- Conduct identity, credit, regulatory and conflict checks
- Organise services from suppliers and service providers
- Comply with legal obligations and to establish, exercise, or defect ourselves from legal claims
- Organise and promote events, including the creating of attendee lists and name badges
- Any other legal basis anyhow permitted by local laws
- Manage the take on or handover of managed property
- Send you communications which you have requested or that may be of interest to you including information about our products and services
- Seek your views or comments on the services we provide
- Pursue our legitimate interests

How long do we hold information on you?

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations.

We will hold your personal information on our systems:

- For as long as is necessary for the relevant activity
- As long as it set out in any relevant contract you hold with us
- As required for legal or insurance purposes
- As is practical or necessary within the IT system we use

Generally we will hold your data for 7 years from the end of our engagement with our client. There are situations where we hold data for longer including:

- Construction projects where a formal contract is signed as a deed – data is held for 12 years from Practical Completion of the scheme
- Valuation files where a re-valuation is performed
- Investment and property purchase history also available in public records and databanks
- Document under seal which must be 12 years (eg some leases or deeds or contracts)

Who has access to your information?

Your personal information will not be disclosed to third parties unless either you agree or we are required to do so to comply with our contractual, legal or regulatory requirements. For instance, where necessary or required we share information with:

- Suppliers of goods or services
- Financial organisations and credit reference agencies
- Debt collection and tracing agencies including bailiffs
- Local and central government
- Tax authorities
- Police forces
- Regulatory authorities
- Security organisations
- Legal and other advisors
- Accountants
- Other parties to a transaction or engagement
- Former owners and managing agents of a property you instruct us to market and subsequent owners and managing agents that you instruct us to hand over to
- Insurance brokers
- Mortgage providers
- Business associates
- Tenants of and suppliers to your properties

We may pass your information to third party service providers, advisors, agents, subcontractors and other associated organisations for the purposes of fulfilling obligations to you. When we use third party service providers, we disclose only the personal information that is necessary to deliver the service.

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Security precautions in place to protect the loss, misuse or alteration of your information

When you provide us with personal information, we take steps to ensure that it is treated securely.

Non-sensitive details are transmitted normally over the internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

We select appropriate service providers who apply high standards of security when it comes to web hosting and IT networks.

We have policies and technical measures in place to protect your Personal Data against unauthorised access, accidental loss, improper use and disclosure. All of our employees and any third parties we engage to process your personal information are obliged to respect the confidentiality of your information and comply with IT and Data Protection Policies.

We do not sell, rent, distribute or otherwise make personal information commercially available to any third party, except as described in this policy or with your prior permission.

Do we collect data from children?

We do not intentionally collect information from children under the age of 16.

If you are under the age of 16, we advise that you speak with and get your parents or guardian's consent before sharing your data with us.

Parents of children under the age of 16: we recommend you to check and monitor your children's use of our products, systems, services, applications (including websites and digital channels) and their social media usage in order to make sure that your child does not share personal data with us without asking your permission.

Transferring your information outside of Europe

All the personal data we process is processed by our staff in the UK however for the purposes of data storage and hosting this information may be located on servers within the European Union.

Any information that you provide to us may entail a transfer of your information to outside the EEA where the level of protection may not be as comprehensive as it is within the EEA. We will ensure that procedures are put in place to ensure that your Personal Data is adequately protected.

If you use our services while you are outside the EU, your information may be transferred outside the EU as a result of the means by which you access information (for example receiving email on your portable device).

How you can access and update your information

The accuracy of your information is important to us. We will proactively confirm details when we are in contact with you. If you change your email address, or any of the other information we hold is inaccurate or out of date, please email us at: info@daviesharrison.com.

What are your rights?

You have a right of access to Personal Data that we may hold about you, to have inaccurate information about you corrected and to request that we stop using your Personal Data for marketing purposes.

You can always contact us if you would like to:

- Review, change or delete the data you have supplied us with (to the extent we are not otherwise permitted or required to keep such data)
- Object to certain data processing operations (eg opt-out from marketing communications)
- Receive a copy of your data (in a common machine readable format, or to the extent it is required by applicable law)
- Raise a complaint on how we have handled your personal data
- Ask us any other questions related to the protection of your data

Please email any requests to info@daviesharrison.com or write to Davies Harrison, The Mission, 2nd Floor, 50 Bridge Street, Manchester, M3 3BW.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office at <https://ico.org.uk>

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in May 2018.