# Bath Stone Property Limited – Privacy Policy

# **Privacy policy**

Your privacy is important to us which is why we will always respect your data and never sell it on to third parties.

This privacy policy explains how we use any personal information we collect about you when you use this website and through your transactions with us. By continuing to use this site you agree to us providing to you the information you have requested and confirm that you have read and agree to the use of your information as set out in our privacy policy.

Bath stone property Ltd, is a company registered in England & Wales with company number 06662877 and whose registered office is located at 14 Queen Square, C/O Zig Zag Chartered Accountants, Bath, England, BA1 2HN. VAT Reg No: 601111129.

Bath stone property is an independently owned company.

Bath stone property is committed to ensuring that your privacy is protected. This privacy policy explains how we use the information we collect about you, how you can instruct us if you prefer to limit the use of that information and procedures that we have in place to safeguard your privacy.

Bath stone property complies with all of the principles relating to the processing of personal data within article 5 of the EU General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR).

## What information do we collect about you and why?

We collect information about you when you register with us or use our services. We also collect information when you voluntarily complete customer surveys and provide feedback. Website usage information is collected using cookies. Bath stone property may record telephone conversations for Training purposes.

When you contact us, book a valuation, request property details or register an interest in the services we provide, we need to know your name, postal address, email address and contact telephone number.

We gather this information to allow us to process your registration, any valuation or viewing bookings you make for a property. The relevant information is then used by us, our agents and sub-contractors to provide any services requested by you and to communicate with you on any matter relating to the provision of the service in general.

We may also use aggregate information and statistics for the purpose of monitoring website usage in order to help us develop the website and our services and may provide such aggregate information to third parties. These statistics will not include information that can be used to identify any individual.

From time to time we may provide your information to our customer service department for research and analysis purposes so that we can monitor and improve the services we provide. We or our agents and subcontractors may contact you by post, email or telephone to ask you for your feedback and comments on our services.

# Call Recording

When a call is recorded:

- a digital recording of the telephone conversation is collected during the call
- Personal data revealed during a telephone call will be digitally recorded for example name and contact details to deliver appropriate services.
- Occasionally 'special category' personal information may be recorded where a customer voluntarily discloses health, religious, ethnicity or criminal information to support their request for advice and/or services.
- Telephone call recording will be turned off, when a customer's credit or debit card details are given, in line with Payment Card Industry Data Security Standards (PCS DSS) and data protection legislation including General Data Protection Regulations ('GDPR').

Call recordings will be used for the following service provision:

- to assist in the quality monitoring of staff performance
- to investigate and resolve complaints
- for the detection, investigation and prevention of crime (including fraud)
- to take actions to protect staff from abusive callers

• to monitor and adhere to quality standards

All call recordings are held securely by the individual branch Data Controller.

## How will we use information about you?

- 1. To comply with our legal and regulatory obligations
- 2. To perform a contract with you or to take steps at your request before entering into a contract
- 3. To fulfil our legitimate interest, we use your personal data in order to deploy and develop our products or services, to improve our risk management and to defend our legal rights.

We collect personal information about you to provide you with the service you have requested and, if you agree, to email you about other products and services we think may be of interest to you.

We use your information collected from the website to personalise your repeat visits to our website.

We would like to send you information about products and services of ours and other businesses carefully selected (a list of preferred suppliers can be located on each branch page of the website) by us to contact you in writing, by telephone, SMS or by email to offer you content, advertisements, products and services that we believe may be of interest to you.

We may also wish to provide you with information about special features of our website or any other service or products we think may be of interest to you.

Bath stone property will not share your information for marketing purposes with companies outside the Bath stone property network, without your permission.

By submitting your information, you consent to the use of that information as set out in this policy. If we change our privacy policy we will post the changes on this page and may place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times. We will also email you should we make any changes so that you may consent to our use of your information in that way. If you have consented to receive marketing, you may opt out at any time. You have a right at any time to stop us from contacting you for marketing purposes.

If you no longer wish to be contacted for marketing purposes, please contact our marketing team at sales@bath stone property.com

## How we protect your information

All personal data is stored securely in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR).

The internet is not a secure medium. We use the most up-to-date technologies to protect the information you give us. We also keep your information confidential. The internal procedures of Bath stone property cover the storage, access and disclosure of your information.

Owing to the global nature of the internet infrastructure, the information you provide may be transferred in transit to countries outside the European Economic Area that do not have similar protections in place regarding your data and its use as set out in this policy. However, we have taken the steps outlined above to try to improve the security of your information.

#### How long we retain your information

Personal data will only be retained for as long as necessary for the purpose of processing. However, the retention periods can differ based on the purpose the data was provided, the requirements of the business, and the lawful basis for processing.

Within our business activities there are some legal and legitimate interest requirements which apply to the retention of personal data; the maximum retention period is 7 years from the date the transaction concluded.

In the absence of any legal requirements, data is to be deleted when:

- the purpose for which it was provided is no longer valid; or
- the data subject has withdrawn consent; or
- the data is no longer up to date

# Corona-virus (COVID-19)

This privacy notice is to make it easier to understand and provide you with more information about how we may seek to collect and

#### hold information about you in relation to the unprecedented challenges we are all facing during the Corona-virus pandemic (COVID-19).

We may seek to collect and process your personal data in response to the recent outbreak of Corona-virus, which is above and beyond what would ordinarily be collected by us, to ensure the safety and well-being of our customers, employees and suppliers.

Such information will be limited to what is proportionate and necessary, taking into account the latest guidance issued by the Government and health professionals, in order to manage and contain the virus. It will enable us to effectively fulfil our functions and enable us to keep people safe, put contingency plans into place and aid business continuity.

#### What personal data is being collected?

Personal data is being collected to enable us to identify any customer, staff member and supplier (or those closely linked to our customers, staff members or suppliers) who have shown any signs of being infected with Corona-virus.

#### What is our lawful basis for processing your personal data?

The General Data Protection Regulation requires specific conditions to be met to ensure that the processing of personal data is lawful. These relevant conditions are below:

Article 6(1)(d) – is necessary in order to protect the vital interests of the data subject or another natural person.

Recital 46 adds that "some processing may serve both important grounds of public interest and the vital interests of the data subject as for instance when processing is necessary for humanitarian purposes, including for monitoring epidemics and their spread".

The processing of special categories of personal data, which includes data concerning a person's health, are prohibited unless specific further conditions can be met. These further relevant conditions are below:

Article 9(2)(i) – is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health.

The information will be managed in a confidential manner. All information will be held securely and processed on a 'need to know' basis by only a

limited number of people. If there is a need to disclose outside of this, the minimal amount of personal data will be used.

# How long will my personal data be retained for?

We will only keep your information for as long as it necessary, taking into account Government advice and the on-going risk presented by Coronavirus.

When the information is no longer needed for this purpose, it will be securely deleted.

## Your rights as a user of this website

As a user you have the following rights:

- A right to be informed about our collection and use of personal information;
- A right of access to the personal information we hold about you;
- A right to rectification if any personal information we hold about you is inaccurate or incomplete;
- A right to ask us to delete any personal information held about you unless we are obliged to retain the information for other legal reasons;
- A right to restrict or prevent the processing of your personal information;
- A right to data portability (obtaining a copy of your data to re-use with another service or organisation);
- A right to object to the use of your data for particular purposes.

# If the business is sold

If this business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

## Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit <u>www.aboutcookies.org</u> or <u>www.allaboutcookies.org</u>

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

#### Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

#### Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page.

#### How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

by email sales@bathstoneproperty.com

or write to us at: Bath stone property, Privacy Team, 1 Hayes Place, Bath, BA2 4QW

#### Complaints

All complaints will be handled under our complaints policy which can be obtained by emailing <u>sales@bathstoneproperty.com</u>.

If you remain dissatisfied then you have the right to lodge a complaint with a supervisory authority, for UK data protection issues this is: The Information Commissioners Office (ICO) Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF W: <u>https://ico.org.uk/concerns/</u>

Request for Information Request for Erasure