

This Privacy Policy provides information on how Huntleys Estate Agents Ltd (Huntleys) and any 3rd party providers collect, use, secure, transfer and share your information.

Huntleys is a leading provider of residential property sales and lettings services in the Charnwood area operating from its town centre offices in Loughborough Leicestershire, located at their registered address:

7 Biggin Street
Loughborough
Leicestershire
LE11 1UA

Registered in England No. 10022616

This privacy notice aims to inform you about how we collect and process any information that we collect from you or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law but a continuation of our respect for you and your personal information. We undertake to preserve the confidentiality of all information you provide to us and hope that you reciprocate.

Our policy complies with the Data Protection Act 2018 (Act), incorporating the EU General Data Protection Regulation (GDPR). The law requires us to tell you about your rights and our obligations to you regarding the processing and controlling of your data. We do this now by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

Summary of how we use your data

- Huntleys use your data to deliver services to you, to send you information about properties and property related services you may request of us or that we think will be of interest to you, also to conduct searches about your identity, your current and past residency addresses, and your right to live in the UK and credit history to meet applicable laws and to provide a recommendation to landlord clients, on your suitability as a tenant.
- Information about you is shared with partners as described in this policy who have undertaken to hold your personal data in compliance with applicable laws.
- Where we rely on your consent for direct marketing purposes, you can withdraw this consent at any time.

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Types of Information Collected and Methods Used

We collect and process personal data about you when you interact with us and our websites and when you register with us to receive our services. Other than the personal data which you give us (which will usually include, name, address, telephone number, email address, date of birth, credit history, previous addresses, and identification) in response to requests from us or other parties to a transaction which you are participating in, information that we collect directly from you includes:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

You may also agree to third parties disclosing information about you to us that those third parties have collected.

"Your Rights and Choices" section of this Privacy Notice specifies your ability, to opt-out or limit the usage of the information collected.



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Purposes of Collection

Generally, we will collect, use and hold your information for the purposes of:

- Assessing applications for and providing Huntleys products / services
- Conducting business, developing relationships with Huntleys and affiliates
- Process payments / transactions including: Accounting, Authorisation, Clearing, Chargebacks, Auditing, Billing, Reconciliation, Collection,
- Complaints, Enquiries, Credit Checks and related dispute resolution activities
- Protect against and prevent fraud, unauthorised transactions, money laundering (please see below), tax evasion, claims, and other liabilities and manage risk exposure and agent /franchise quality, integrity, compliance and security of business processes
- Create and manage any accounts and associated authentication criteria (id's and passwords) you may have with Huntleys
- Provide, administer and communicate with you about Huntleys products, services, offers, programs and promotions, their issuers, acquirers, retailers and partners
- Compile business directories, including business contact information
- Operate, monitor, evaluate and improve our products, services, websites, mobile applications, other digital assets and business
- Developing new products and services
- Managing communications, assessing effectiveness and optimisation of advertising
- Evaluate your interest in employment and contact you regarding possible employment opportunities
- Enforce Huntleys "Terms of Use" and other legal rights as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over Huntleys or its affiliates.
- Comply with industry standards and Huntleys policies

In addition, to help you with a property-related service, we must comply with certain regulations, for example, the "Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to as the Regulations)." Huntleys is required to obtain certain information from you to comply with regulations. The information provided will only be used by Huntleys about complying with the Regulations and will not be shared with any other party unless we are required to do so under law.

Suppose you enter into a business relationship with Huntleys. To comply with the regulations, we will require two separate identification documents, one primary and one secondary, even if they appear on both lists. The information may be required at various stages of the process depending on whether you are: Purchasing, Selling, Letting or Renting.

Primary documents: proof of ID

- Valid Passport with MRZ
- Valid full UK photo driving licence
- Valid full UK Driving licence (Non-photo, paper) issued before 1998
- Valid EU/EEA/Switzerland photo driving licence
- Valid EU/EEA/Switzerland national Identity Card
- Valid UK Armed Forces ID Card
- Valid UK Biometric Residence Permit (copy of both sides)
- Valid Blue disabled drivers pass (With photo)
- Valid Freedom Pass
- Valid Local Authority Bus pass
- Department for Works & Pensions letter confirming pension details including National Insurance Number dated within 12m

Secondary documents: proof of residence (home)

- Valid full UK photo driving licence
- Valid full UK Driving licence (Non-photo, paper) issued before 1998
- Local authority council tax bill (dated within 12m)
- UK Bank / Building societies statements/bills showing activity, dated within the last six months. Including account number and sort code (Internet printed acceptable)
- UK mortgage statement (dated within 12m, Internet printed acceptable)
- Utility bill dated within the last 6 months including Electricity bill (with MPAN number), Landline, Gas, Satellite TV, Water (Internet printed acceptable, Not mobile phone bills)
- Her Majesty's Revenue and Customs (HMRC) Inland Revenue (IR) Coding/assessment/statement (dated within 12m) with National Insurance number
- Department for Works & Pensions letter confirming pension details and NI Number (Dated within 12m)

We reserve the right to employ third-party electronic verification to verify identity. This search will not affect your credit rating



The Property
Ombudsman



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Lawful basis of processing

Huntleys processes your information under the following:

- Performance of a contract: where you enter into a contract with Huntleys and we need to process your information as part of this contract
- Legitimate interests: some information is processed by Huntleys as part of its legitimate interests which include: Fraud, risk assessment, due diligence, network and information security, suppressions and managing opting out of communications, profiling, direct marketing, monitoring, web analytics, cloud storage, acquisitions, updating customer details, lettings, sales, financial services and other core products and service provided by the data controller
- Public interest: some information is processed in accordance to public interest such as relocations
- Consent: where we process information under consent, we will seek you clear and unambiguous consent prior to processing your data

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Information We Share

We do not sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via the consent process when the data is collected. We share the information we collect with, but are not limited to:

- Landlords and landlord associates and subprocessors
- Vetted affiliates and partners / Financial Institutions / Insurance Companies for business facilitation to provide required services, such as mortgages, insurance cover etc
- Formally contracted service providers to perform services on our behalf: Hosting Datacentres, Infrastructure, Applications (Development / Support), Cloud Services (Software as a Service - SaaS, Platform as a Service - PaaS, Infrastructure as a Service - IaaS), Helpdesk, Call Centres etc. We contractually require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements
- Credit agencies, Land Registry Office, Her Majesty's Revenue and Customs (HMRC), Financial Conduct Authority (FCA), and other relevant regulatory bodies

Additionally, we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities

Perspective employers requesting references via your written consent

On websites, features can be accessed where we partner with other entities that are not affiliated with Huntleys. These include social networking, geo-location tools, etc. operated by third parties (indicated appropriately) who may use or share personal information in accordance with their own privacy policies. It is recommended that you review the third parties privacy policies if you use the relevant features.

Huntleys reserve the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets, with reasonable efforts for the acquirer to protect/use your information consistent with our Privacy Notice. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.

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How long do we keep information for

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep your information for as long as necessary. We generally keep personal information for 7 years after last contact with you. However, Huntleys reserves the right to keep information for longer if we feel that this is in the legitimate interests of Huntleys.

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International Data Transfers

Huntleys may transfer the personal information collected about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Privacy Notice or as otherwise disclosed to you at the time the data is collected (e.g. via program-specific privacy notice).



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Profiling

For the purposes of business conduct, enhancement, identification of fraud, money laundering, and other potential unauthorized activities, Huntleys engages in profiling activities via direct use or anonymization of sensitive personal information.

Direct profiling is engaged for the fair and lawful purposes, to provide Huntleys the ability to enforce Huntleys "Terms of Use", legal reporting as may be required by applicable laws, regulations, policies/standards or requested by any judicial process or governmental agency having or claiming jurisdiction over Huntleys or its affiliates; including, but not limited to:

- Benchmarking employees: appraisals, performance, bonus payments, disciplinary actions, improvement plans, promotions, and awards
- Background checks for existing and new employees, clients, business partners, affiliates
- Financial Viability analysis/reports
- Business partner/client portfolio position, performance, risk positions
- Anti-money laundering
- Tax reporting
- Credit defaulting / exposure

Indirect profiling via anonymization of personal information is also used for preparing and furnishing aggregated data reports showing anonymized information, including, but not limited to, the following:

- Compilations, analyses, analytical and predictive models and rules, and other aggregated reports for the purpose of advising our partners/affiliates and servicing institutions, retailers, and other customers regarding past and potential future patterns of service usage, spending, fraud, and other insights that may be extracted from this data
- Compiling and communicating promotional and marketing information about products and services that Huntleys, affiliates, and other organizations that we have affiliations with and that may be of interest to you
- Conducting market research
- Facilitating our internal business operations, including the fulfillment of any legal requirements

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Your Rights and Choices

Your rights regarding the sensitive/personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information, and how we communicate with you.

You may have the right to:

- obtain confirmation that we hold personal information about you
- request access to and receive information about the personal information we maintain about you
- receive copies of the personal information we maintain about you

The right to access personal information may be limited in some circumstances by local law requirements.

To exercise these rights, please contact us as set forth below.

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Update and correct inaccuracies in your personal information

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate. If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to the information we hold about you.

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Object to the processing of your personal information

If you would like to object to any processing of your information by Huntleys you can contact us outlining what processing of the information you would like to object to.



11 **Have the information blocked, anonymized, or deleted**

If you would like Huntleys to delete, block or anonymize information we hold about you, you can contact us outlining what information you would like deleted, blocked, or anonymized.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us as specified in the “How to Contact Us” section below.

12 **Opting out of processing**

You can opt-out of the collection of personal information by automated means, e.g. when visiting our website or visiting third-party websites and interacting with our adverts, by using the Cookie Consent tool displayed on the website (the browser you use may provide options on how to opt-out of receiving certain types of cookies). However, without cookies, you may not be able to use all the website features and/or online services.

Huntleys operate a cookie policy. Some of our service providers and partners may collect information about your online activities over time and across third-party websites to customize and target our adverts.

You can at any time tell us not to send you marketing communications by:

- e-mail let@huntleys.net
 - unsubscribing via the “unsubscribe link” within the marketing e-mails you receive from us, or
 - contact Huntleys as indicated below
-

13 **Withdrawal of consent**

If we obtain your information by consent, you have the right to withdraw any consent you previously provided to us. If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information.

Huntleys we will apply your preferences going forward. Doing so will mean that you cannot take advantage of certain services and promotions. The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.

14 **How to Contact Us / Complaints and Feedback**

If you:

- make a complaint about a breach of your personal information, applicable privacy laws/principles or a concern about Huntleys' privacy practices
- would like access and/or update information or preferences you provided to us,

You also may e-mail us at: let@huntleys.net

Or write to us at:

Data Protection Officer
Huntleys Estate Agents Limited
7 Biggin Street
Loughborough
Leicestershire
LE1 1UA

If we fall short of your expectations in processing your personal information or you wish to make a complaint about our privacy practices, please contact us via the details in the “How to Contact Us” section.

To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time. If we cannot for lawful reasons, complete your request, we will explain this to you to the extent that we lawfully can.



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How We Protect Personal Information

The security of your personal information is very important, and Huntleys is committed to protecting the information we collect. We maintain administrative, technical, and physical safeguards designed to protect the personal information you provide, or we collect against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use. We use SSL encryption on our website from which we transfer certain personal information.

Huntleys stores personal information only for as long as it is necessary for the fulfillment of the purpose for which the personal information was collected unless otherwise required or authorized by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

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Digital Marketing

Properties marketed by Huntleys will only be featured on selected websites, portals and channels. These include Huntleys.net, and the following authorised sites: Rightmove | Zoopla | Primelocation | OntheMarket | Boomin | SpareRoom | YouTube | Facebook | Twitter | Instagram | Linked In. No other sites, channels or portals are authorised to display properties associated with Huntleys and we cannot guarantee the accuracy of any information that may be available on any unofficial sites.

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Updates to this statement

We will update this statement from time to time, so we suggest that you review this statement at regular intervals. Where we undergo substantial changes to our privacy statement, we will endeavor to inform you directly about these changes.

This statement was created on the April 2019. There are no prior versions.

