

#### WHO WE ARE

We are Woods Independent Real Estate Limited, company no. 14678118, ICO no. ZB525109.

Our Registered address is 50-52 Eyhorne Street, Hollingbourne, Maidstone, Kent, ME17 1TS (referred to as "we" or "us" or "our"). We are the providers of the website www.woods-estates.co.uk (referred to as the "Site"). We are registered as a Data Controller with the Information Commissioner's Office with registration number detailed above. We provide this Site to advertise our properties and services online. We are an Estate Agent working with partners in related services such as conveyancers, mortgage advisors and surveyors.

A reference to "you" or "your" is a reference to a user of the Site or any of our services.

# **INTRODUCTION**

We are committed to protecting your privacy and we aim to comply at all times with the rules introduced by the General Data Protections Rules May 2018. This privacy policy (referred to as the "Policy") explains how and for what purposes we use the information collected about you. Please read this Policy carefully. By using this Site and any services we offer via this Site, you are agreeing and consenting to the processing of your data as set out below.

This Policy only relates to the personal information that we collect about you from the Site or from third parties such as social media companies.

## **CONTACTING US**

If you would like to opt out of marketing and communications from us please contact us via email to contact@woods-estates.co.uk or please write to the Managing Director, 50-52 Eyhorne Street, Hollingbourne, Maidstone, Kent, ME17 1TS.

## WHAT PERSONAL DATA DO WE COLLECT FROM YOU?

Information you give us: We will collect the information that you give to us when using our Site. If you choose to access a particular search feature or to fill in a form on the Site, you may be asked to provide information about yourself, such as your name and contact details. We may also collect other information about you at the same time, such as details of the sort of property you are interested in, the cost and location of the property etc. We will also collect information that you provide to us when you register as a property applicant with us, request property email updates, participate in discussion boards or other social media functions on our Site or websites operated by associated third parties and enter into competitions, promotions or surveys. We will also collect information that you provide to us by corresponding with us by phone, e-mail or otherwise.





Information we collect about you: This is different to "information you give us" because it relates to technical data that we collect. So for example, we may collect technical information that has the potential to identify you, such as the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We may also collect information about your visit, including the full uniform resource locators (URL) clickstream to, through and from our Site (including date and time), products 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), methods used to browse away from the page and any phone number used to call our customer service number. We may also keep a record of the advertisers or partners you contact and the contents of the emails you send to them.

Information we receive about you from third parties: We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you, when we collected that data, that it may be shared internally and combined with data collected on this Site. We are also working closely with third parties (including, for example, social media platforms, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies) and may receive information about you from them.

# WHAT DO WE DO WITH YOUR PERSONAL DATA?

#### MAIN USES OF YOUR DATA

This section of the Policy describes the things that we do with your data which relate directly to your use of the Site and our services.

Under Data Protection Legislation, there must be a 'lawful basis' for the use of personal data. The lawful bases are outlined in Article 6, Section 1 of the GDPR. They are sub-sections:

- •a) 'your consent';
- •b) 'performance of a contract';
- •c) 'compliance with a legal obligation';
- •d) 'protection of your, or another's vital interests';
- •e) 'public interest/official authority'; and
- •f) 'our legitimate interests'.

# We will use your information:

- to provide the services available on our Site to you;
- when you consent to us doing so, to pass your searches and messages on to our internal service sectors, which include estate agents, commercial agents, managing agents, valuers and surveyors to help them communicate with you directly and to provide a more personalised service to you. This may include contacting you about other relevant properties, adding you to our enquiry database for future contact and offering you our additional services;
- · customise and enrich your experience on our Site;





- to allow you to participate in the interactive services available on our Site or to participate in competitions or promotions via our Site;
- to contact you for your views on our services and to notify you occasionally about important changes to our Terms of Use or this Policy or developments to this Site or our services; and
- to deliver relevant advertising to you whilst you are on the Site.

## **TECHNICAL USES**

This section of the Policy describes the things that we do with your data that arise from our monitoring of the Site and the collection of your information whilst using the Site. We may use this information:

- to identify patterns that we can use in our marketing strategy and to help us develop, administer, support and improve our services and features and adverts;
- to conduct reviews that assist us in the improvement and optimisation of our Site;
- to ensure that content from our Site is presented in the most effective manner for you and for your computer;
- to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- as part of our efforts to keep our Site safe and secure.

We may combine technical information with other information that we have about you to help us with our processing of your information as described in this Policy.

# USE OF YOUR DATA FOR MARKETING AND COMMUNICATION

Sometimes we may use your personal information to provide marketing messages to you or allow us or third parties to communicate with you on third party services. We will always seek your consent before doing so and you can opt out of marketing and other communications at any time by contacting us at contact@woods-estates.co.uk.

You can always make use of the Site without having to agree to marketing. The types of things that we may do include:

- providing direct marketing advertisements and communications to you via email, post or telephone;
- making suggestions and recommendations to you and other users of our Site about goods or services that may interest you or them;
- providing your information to selected third parties that we believe may be able to offer you goods or services that are of interest so that they can contact you about their goods and services; and
- monitoring the effectiveness of our direct marketing communications and your responses to it.





## WHO HAS ACCESS TO YOUR PERSONAL DATA?

We retain access to all personal information that we have collected from you or about you. Once your information has been passed to one of our team in the course of providing our services (most typically when you communicate with an estate agent through our Site) then that department will have a copy of the information that you have provided about the property enquiry and your contact details which they will use to get in touch with you.

We recommend that you check the policy of any website that you visit and make sure that you are comfortable with the terms of such policies before providing any personal information.

If our business is sold or merged, or if we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets. We will make sure that any such transfer is done in a secure way.

If we offer or supply a service to you that is provided on our behalf by a third party we may have to pass your information to them in order to deliver the service. By using this Site you consent to us providing your information to the third parties authorised by us to provide such services. We may also use third parties to provide services on our behalf which may include processing (but not using themselves) your information e.g. to complete partial addresses or to augment the information we hold about you. In either case, we will not pass your information to anyone who is not also subject to adequate privacy commitments in our contract with them and we will not allow the third party to use your information for marketing purposes without your consent.

We will not otherwise disclose, sell or distribute your information to any third party without your permission unless we are required to do so by law or to obtain professional advice. We will retain your information for as long as is reasonable and necessary and no longer than permitted by law.

# WHERE DO WE STORE YOUR PERSONAL DATA?

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We follow strict security procedures to ensure that your personal information is not damaged, destroyed or disclosed to a third party without your permission and to prevent unauthorised access to it. The computers that store the information are kept in a secure facility with restricted physical access and we use secure firewalls and other measures to restrict electronic access. If we are working with third parties, we will require them to have in place similar measures to protect your information.

Only employees who need access to your information to perform a specific job are granted access to personally identifiable information. We may require you to co-operate with our security checks before we disclose information to you.



**ME17 1TS** 



## HOW LONG WILL YOUR DATA BE KEPT?

WOODS INDEPENDENT REAL ESTATE LIMITED holds different categories of personal data for different periods of time. Wherever possible, we will endeavour to minimise the amount of personal data that we hold.

- If 'consent' is the basis for our lawful processing of your data, we will retain your data so long as both the purpose for which it was collected, and your consent, are still valid. We review the status of your consent every twelve (12) months and treat non-response to our requests for renewal of consent as if they were your request to withdraw consent. Occasionally, we might identify a legitimate interest in retaining some of your personal data that has been obtained by consent. If we do, we will inform you that we intend to retain it under these conditions and identify the interest specifically.
- If we process your data on the basis of 'legitimate interests', we will retain your data for so long as the purpose for which it is processed remains active. We review the status of our legitimate interests every twelve (12) months and will update this notice whenever we determine that either a legitimate interest no longer exists or that a new one has been found.
- All categories of personal data that are held by us because they are essential for the performance of a contract, will be held for a period of six years, as determined by reference to the Limitations Act 1980, for the purposes of exercising or defending legal claims.

#### YOUR RIGHTS

You have the right to ask us not to process your personal data at any time. You have the right to use our Site without consenting to marketing and communication services that we provide. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. We always use the most recently submitted information to be your current consent status. You can also exercise the right at any time by contacting us at <a href="mailto:contact@woods-estates.co.uk">contact@woods-estates.co.uk</a>. The General Data Protection Regulations May 2018 gives you the right to access information held about you. Your right of access can be exercised in accordance with the Regulations.

# How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at Woods Independent Real Estate Limited. You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113CO & ICO website: https://www.ico.org.uk





We will update this privacy policy when necessary to reflect feedback, changes in our services or legal changes. When we post changes to this policy, we will revise the 'Effective Date' at the top of the privacy policy and note where the changes have been made.

