

## Privacy Policy

This Privacy Policy (together with our Website Terms of Use) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This Privacy Policy also sets out how you can instruct us if you prefer to limit the use of that personal data and the procedures that we have in place to safeguard your privacy.

For the purpose of the Data Protection Act (“the Act”) and the General Data Protection Regulations (“GDPR”), that replace it from 25th May 2018, the data controller is Crane Property Sales Ltd (“CPS”, “us”, “our” or “we”).

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### 1. About Crane Property Sales Ltd

Crane Property Sales Ltd is limited company whose business is Estate Agency dealing with Residential property sales. Our registered office is 34 St James Street, South Petherton, Somerset, TA13 5BW.

CPS is committed to ensuring that the principles of GDPR are adhered to; that the rights of individuals under GDPR are appropriately protected; and that privacy by default and design is at the heart of our approach to data protection.

### 2. Information we may collect from you

In our day to day business we may collect personal information from a range of subjects including, but not limited to:

- property vendors – prospective, current and past
- property purchasers– potential, current and past
- users of our professional services – potential, current and past
- people who we believe may be interested in our services, or who have expressed an interest in receiving our marketing material, or attending events organised by us

In respect of each subject class above, we may gather and hold the following personal information:

- personal identifiers such as name, address, phone, email
- preferences with regards to property to buy, or other areas of interest
- financial and other personal information required for the purposes of effecting a sale or purchase
- some electronic data such as your IP address (your computer’s internet identity) and other details of visits to [cranepropertysales.co.uk](http://cranepropertysales.co.uk). This data is not used by us, or any third party, to identify an individual

We do not specifically process special category data such as nationality, sexuality, belief etc, nor do we collect more than very limited personal data about children. Should we do so, we will ensure that extra safeguards are in place.

We may collect or hold data from the following sources:

- our Website, if you complete a form registering your interest in receiving further information
- property portals to which we subscribe such as Rightmove, where you have completed a request for further information
- registration of your interest in our services in person, in writing, by email or on the phone
- gathered in the natural course of a transaction or ongoing professional service, where that data is relevant to performance of the contract, or legally required
- from our current databases of past and present clients, potential clients and applicants
- from official 3rd party sources, such as Land Registry, where we have identified that we may be able to offer a specific service to you

### **3. How we may use this information - And the legal basis for doing so**

We may process this information for the following purposes:

- a. For the performance of a contract – whether a sale or purchase – for the instigation and duration of that contract. We may hold all or part of that information for an indefinite period thereafter unless you ask us to desist.
- b. For the legitimate interests of ourselves and others in providing information to debt collection agencies, insurers and the like, for 7 years after the expiry of the original purpose.
- c. For the fulfilment of a request by you, via our Website or other means, to provide details of forthcoming auctions; suitable properties to buy or other professional services. We will continue to supply you with such details until you ask us to desist. We have assessed that we have a legitimate interest in providing you with related information that we believe may be of interest or helpful to you in relation to your request. We will process your data until you ask us to desist.
- d. For the fulfilment of a legal or regulatory duty, for as long as that obligation persists.
- e. For the provision of marketing information about our services that we consider may be of interest to you, or that we believe may assist you in your move or professional requirements. We have assessed that this is a legitimate interest for the purposes of demonstrating the full breadth and quality of our services to our clients and potential clients. We do not believe that this offering is detrimental to the rights of those data subjects and, on balance, consider that it is less intrusive than obtaining specific consent to send marketing material. We will not supply this data to third parties, except solely to effect delivery of the material, and will unsubscribe subjects immediately on request.
- f. Other marketing information for which we may request your specific consent, having advised you of the purpose and relevant retention period.

We, or third-party processors, may use limited automated decision-making for the following purposes: referencing or money-laundering checks, which are necessary for legal or contractual purposes. We ensure that there is human intervention to refine the automated results where necessary, and allow you to challenge the results or the data input to reach the decision.

### **4. Sharing your personal data**

We may share your data with third parties, either directly or in passing, for the following purposes:

- a. To help us in the fulfilment of a contract or service to you, including our current providers of the following services:

- EPC and brochure production
- Sign board erection
- Utility switching
- Money-laundering checking
- Lawyers, conveyancers and professional advisors
- The other party to a contract, or the lender, in the case of a survey or valuation

b. To assist us in the running of our own business, including our current providers of the following services:

- Estate agency software, including applications to look up postcodes, sign documents etc.
- Accounts and payment processing software
- Website and IT services

c. With your permission, to a financial services provider

d. As required to authorities or regulators, including:

- HMRC and FCA
- RICS, ARLA, NAEA
- Ombudsmen
- Enforcement agencies

e. For the delivery of our own marketing material via printing or delivery businesses

f. After assessment, to meet the legitimate interests of others in referencing, debt-collection, managing insurance claims and the like.

We do not sell data to third parties.

## **5. Security of your data**

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data.

As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. Where we disclose your personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data.

The information that you provide to us will be held in our systems, which are located on our premises or those of an appointed third party. We may also allow access to your information by other third parties who act for us for the purposes described in this Privacy Policy or for other purposes approved by you. We believe that we do not currently conduct any processing outside the European Economic Area (the EEA) but, should we be aware that your data is to be transferred outside the EEA, we will require that appropriate safeguards are in place.

## **6. Our Website**

Specific personal data, such as your IP address, is collected on our Website, and we may also transfer pieces of information known as Cookies to your computer or device. You may access other websites

from our website. All of these matters, and other terms specific to the Website, are covered in our Website Terms of Use, available on the Website, or on request.

## **7. Your rights in respect of your data**

GDPR clarifies a number of rights for data subjects, which are summarised below:

- Right to be informed – we should tell you what data we hold and what we do with it
- Right of access to your data – to know what data we hold on you
- Right to rectification and erasure – if you would like us to correct an inaccuracy or, where legally possible, to delete or anonymise your data
- Right to restrict processing or object to our processing data
- Right to portability of data – so that you can see and use the data for your own purposes

If you wish to exercise any of these rights, you should contact us as set out below.

## **8. Updates to our privacy policies**

We may update our policies from time to time if operational needs or legislation requires amendment. New versions of the policies will be published on our website or available on request, but will not otherwise be notified.

## **9. Contact us**

It is our intention that we should adopt best practice to comply with the complicated and developing requirements of GDPR. However it may be that we have not interpreted the guidelines, or effected them in practice, as we should. If that is the case, we would prefer that you address any concerns in the first instance to us and we will do our absolute best to deal with the issue to your satisfaction in the appropriate timeframe.

Should you have any queries about our policies, or wish to exercise any rights conferred under GDPR, please email [info@cranepropertysales.co.uk](mailto:info@cranepropertysales.co.uk) or write to The Managing Director, 34 St James Street, South Petherton, Somerset TA13 5BW. If you are exercising any rights, we will ask you to verify your identity and detail your request in writing.

There is additionally much relevant information on the website of the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk), including the ability to report a concern directly to them, should you wish to do so.