

HOLLAND BROADBRIDGE PRIVACY POLICY 2018

We are Holland Broadbridge, data protection registered number ZA356919.

General Data Protection Regulation (GDPR) 2018

The General Data Protection Regulation (GDPR) 2018 is a legal framework of guidelines that regulates the collection, storing and processing of personal information of individuals within the European Union (EU).

The GDPR is specifically designed to set strategic guidelines for data management for businesses, and strengthen the individual rights of EU citizens. The GDPR replaces the Data Protection act 1998.

This policy has been written in line with the General Data Protection Regulation (GDPR) 2018. We are committed to safeguarding the privacy of our customers; this policy sets out how we will treat your personal information and what we will do with your personal information.

This policy explains what personal information we collect from you, how we collect it and for which purposes. The policy also explains your right to view your personal information held and how you can ask us to delete it.

Data Controller

Holland Broadbridge is a Data Controller. A Data Controller refers to a person who (either alone, jointly, or in common with other persons) determines the purposes for which – and the manner in which – any personal data are, or is to be, processed.

As a Data Controller, Holland Broadbridge is accountable for enforcing data protection principles. We adhere to the rules and regulations of GDPR 2018, we bear primary responsibility for ensuring that all of our data processing activities meet the strict requirements of GDPR 2018.

Website

Holland Broadbridge only collect personal data from Holland Broadbridge (our website) if the customer gets in touch directly. A form is filled out and emailed directly to sales@hbshrop.co.uk / lettings@hbshrop.co.uk .

We process this personal data on the lawful basis contractual necessity. We will continue to store your personal data and contact/send you updates on properties on the lawful basis that Holland Broadbridge has a legitimate interest and that you the client also has a legitimate interest.

Cookies

Cookies are small text files that are placed on your computer's hard drive through your web browser when you visit any website. They are widely used to make web sites work, or work more efficiently, as well as to provide information to the owners of the site.

Like all other users of cookies, we may request the return of information from your computer when your browser requests a web page from your server. Cookies enable our web server to identify you to us, and to track your actions and the pages you visit while you use our website. The cookies we use may last for a single visit to our site (they are deleted from your computer when you close your browser), or may remain on your computer until you delete them or until defined period of time has passed.

Although your browser software enables you to disable cookies, we recommend that you allow the use of cookies in order to take advantage of the features of our website that rely on their use. If you prevent their use, you will not be able to use all the functionality of our website.

Holland Broadbridge uses the following Cookies: VEBRA, Rightmove, OnTheMarket.

Google Analytics

Holland Broadbridge uses Google analytics to provide us with reports on website activity (traffic). It collects technical and usage data on the lawful basis that Holland Broadbridge has a legitimate interest.

Registration

The act of registering on our mailing list or arranging a viewing. Holland Broadbridge recognises that any communications initiated by the customer are transactional and we record your personal data on the lawful basis contractual necessity. Following the fulfilment of the initial contact and process of data we will continue to store your personal data and contact/send you updates on properties on the lawful basis that Holland Broadbridge has a legitimate interest.

We constantly review the legitimate interest on a monthly basis if we believe that both our legitimate interests have come to an end then we will contact you or further consent to keep and process your personal data.

Completions and Tenancy Agreements

In order to comply with a legal or regulatory obligation Holland Broadbridge is required by the Limitations Act 1980 to keep transaction records for six years. This applies to past and present transactions.

Email

We receive emails from online portals that contain your personal data and we process this data on the lawful basis contractual necessity. We will record your details, phone and send you further emails/texts re other properties on the lawful basis legitimate interest. We constantly review the legitimate interest on a monthly basis if we believe that both our legitimate interest have come to an end then we will contact you or further consent to keep and process your personal data.

Third Parties

Holland Broadbridge is not responsible for the privacy policies or practices of third parties. We sometimes need to pass personal data to third parties. We will always gain your consent before passing details to third parties. Holland Broadbridge store personal data using VEBRA and Rentman - estate agency software providers - a copy of their Privacy policy can be found in our office. Below is a list of third parties who we share personal data with and the purpose of the processing.

VEBRA: Estate agency software provider used to store the personal data of our vendors, applicants and properties.

Rentman: Estate agency software provider used to store the personal data of our landlords, tenants and properties.
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OGL: Email host.

Clickingmad: Website hosting and maintenance.

Lets XL: Tenant Referencing Agency.

Rightmove and OnTheMarket: External online property portals.
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Canvassing

Holland Broadbridge sends out unspecific canvassing material to a large number of properties on a regular basis. We do not canvass using personal data. Holland Broadbridge will use 'sold / let near you' canvassing material we have gained consent from the instructing client to do so.

Current Database

Our current database is very important to us. If we are holding your personal data prior to the GDPR changes on May 26th 2018 we will be contacting you to let you know we have your personal data and will continue using your personal data on the lawful basis of legitimate interest. You, of course, have the right for your data to be deleted, if this is the case please contact us.

What Data Do We Hold?

Holland Broadbridge records the following types of data.

Name, address, telephone number and email address.

We are required by HMRC to adhere to the Anti Money Laundering Regulations 2017 this requires us to record and store Identification for buyers and sellers. We are required by HMRC to hold this information for six years.

Purposes For Which We Use Your Personal Data

We have set out below, some of the ways we plan to use your personal data and, which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below:

Purpose /Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a)Identity (b)Contact	Contractual necessity.
Property Updates	(a)Identity (b)Contact	Legitimate interest of the applicant.
To manage our relationship with you which will include: (a)Notifying you about changes to our terms or privacy policy. (b)Asking you to leave a review or take a survey.	(a)Identity (b)Contact (c)Profile (d)Marketing and Communications	(a)Contractual necessity. (b)Necessary to comply with a legal obligation. (c)Necessary for our legitimate interests (to keep our records updated and to study how customers use our products / services).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a)Identity (b)Contact (c)Technical	(a)Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). (b)Necessary to comply with a legal obligation.
To use data analytics to improve our website, products / services, marketing, customer relationships and experiences.	(a)Technical (b)Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about goods or services that may be of interest to you.	(a)Identity (b)Contact (c)Technical (d)Usage (e)Profile	Necessary for our legitimate interests (to develop our products / services and grow our business).
To verify ID of a buyer, seller, landlord and tenant.	(a)Identity	Necessary for us to comply with a legal or regulatory obligation.

Data Protection Officer

Sandra Broadbridge is the data protection officer for Holland Broadbridge.

Lawful Basis Glossary

Legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service / product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you unless we have your consent or are otherwise required or permitted by law. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Contractual necessity means processing your personal data in order to fulfil our contractual obligations to you or, where you have asked us to do something.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Consent means genuine unambiguous consent from you before we process your personal data.

Deleting Data

All of our clients have the right to request that their personal data is deleted. If requested the client will receive written confirmation of what data was held and what has been deleted.

On an occasion we may be asked to delete data that relates to a previous transaction (completed sale/tenancy agreement) we have the right to deny this, as we are required by HMRC to store records for six years.

We are also required to store ID to prove a client's identification upon request from HMRC AML 2017.

Data Breach

Holland Broadbridge takes the safeguard of its clients and their personal data seriously. In the event of a data breach the clients will be made aware of the data breach within 72 hours of discovery. A record will also be logged with the Information Commissioner's Office (ICO).

Policy Amendments

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes. We may also notify you of changes to our privacy policy by email.

Updating Information

Please let us know if the personal information which we hold about you needs to be corrected or updated.

Contact

If you have any questions about this privacy policy or our treatment of your personal data, please write to us by email to sales@hbshrop.co.uk .