

PRIVACY NOTICE

David Watkins t/a DAVID WATKINS & Co PROPERTY BROKERS – as the Data Protection Lead can be contacted at dwpropertyco@btconnect.com or via the web site. This privacy notice is produced in order to keep you informed of how your personal data will be used. All handling of your personal data is done in compliance with the General Data Protection Regulation (EU) 2016/679 ("Data Protection Legislation").

WHAT ARE YOUR RIGHTS

When reading this notice, it might be helpful to understand that your rights arising under Data Protection Legislation include:

- The right to be informed of how your Personal Data is used (through this notice);
- The right to access any personal data held about you;
- The right to withdraw consent at any time, by emailing dwpropertyco@btconnect.com
- The right to rectify any inaccurate or incomplete personal data held about you;
- The right to erasure where it cannot be justified that the information held satisfies any of the criteria outlined in this policy, or where you have withdrawn consent;
- The right to prevent processing for direct marketing purposes, scientific/historical research or in any such way that is likely to cause substantial damage to you or another, including through profile building; and
- The right to object to processing that results in decisions being made about you by automated processes and prevent those decisions being enacted.

WHO IS THE DATA CONTROLLER

- If we have collected your personal data directly from you for our own purposes, we are the Data Controller.
- If we have been passed your personal data from a third-party for our own purposes, we are the Data Controller. We will contact you to let you know before we first start to use it, or, at the latest, within one month of acquiring it.
- If we have been passed your personal data from a third-party for a joint purpose that we both influence, we are the joint Data Controller. We will contact you to let you know before we first start to use your data, or, at the latest, within one month of acquiring it.
- If your data has been passed to us by a third party for processing under their instruction, that third party is the Data Controller. They should have notified you that they would be passing your personal data to **David Watkins & Co Property Brokers** at the time they collected your data and within their own privacy notices/standards. For a list of Data Controllers that we process personal data for, the section below 'Third Party Interests'.
- If we have received your personal data as part of a business to business relationship, the Data Controller is your employer.

WHAT ARE THE LAWFUL BASIS FOR PROCESSING YOUR DATA

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'.

ABOUT OUR PROCESSING OF YOUR DATA Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include anonymous data.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Identity Data	includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
Contact Data	includes billing address, delivery address, email address and telephone numbers.
Financial Data	includes bank account and payment card details.
Transaction Data	includes details about payments to and from you.
Technical Data	includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
Usage Data	includes information about how you use our website, products and services.
Special Categories of Personal Data	We do not collect any information - race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, information about your health, genetic and biometric data, criminal convictions/offences, political opinions, T U membership.

Item	What categories of information about you do we process?	Why are we processing your data?	Where did we get your personal data?
INVOICES	Identity data Contact data Financial data Transactional data	Our bank account may receive details of your payment by BACS or cheque received for an invoice we have issued. This activity is by the bank on your behalf to us. The processing is lawfully conducted on the basis of 'performance of a contract'.	Directly obtained from you via your bank
PHONE CALLS or TEXT MESSAGES	Identity Data Contact Data	We might record calls/texts for reference and accountability of our customer services. This processing is conducted lawfully on the basis of 'our legitimate interests'.	Directly obtained.
Web contact or email	Identity data Contact data	Should you contact us through our website or by email, we will use the information you send in order to respond to your enquiry or complaint. This information will be kept in order to improve our service to you. This processing is conducted lawfully on the basis of 'our legitimate interests'	Directly obtained or indirectly obtained through a client's website (notice given at the point of collection).

OUR USE OF COOKIES

We do not use cookies

WHAT HAPPENS IF YOU REFUSE TO GIVE DAVID WATKINS & Co PROPERTY BROKERS YOUR PERSONAL DATA

The information about you that we have collected for the performance of our contracts is required in order for us to successfully fulfil our obligations to you. If you choose not to provide the personal data requested, we will not be able to enter into a contract with you to provide the benefits we offer. If we are already processing your personal information under a contract, you must end our contractual relationship (as/where permitted) in order to exercise some of your rights.

We process some personal information as part of a contractual relationship with a Data Controller. Any requests to restrict this type of processing should be forwarded to the Data Controller; they will be responsible for discussing your concerns and making any decisions.

WHAT ARE DAVID WATKINS & Co PROPERTY BROKERS 'LEGITIMATE' INTERESTS'?

Legitimate interests are a flexible basis upon which the law permits the processing of an individual's personal data. To determine whether we have a legitimate interest in processing your data, we balance the needs and benefits to us against the risks and benefits for you of us processing your data. This balancing is performed as objectively as possible by our Data Protection Lead. You are able to object to our processing and we shall consider the extent to which this affects whether we have a legitimate interest. If you would like to find out more about our legitimate interests, please contact us via dwpropertyco@btconnect.com

HOW LONG WILL YOUR PERSONAL DATA BE KEPT?

DAVID WATKINS & Co PROPERTY BROKERS 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.

WHO ELSE WILL RECEIVE YOUR DATA?

DAVID WATKINS & Co PROPERTY BROKERS may pass your data to the third parties listed in the section '*Third Party Interests* below, for the purposes of providing our service to you, and for no other purpose.

DOES YOUR DATA LEAVE THE EU?

DAVID WATKINS & Co PROPERTY BROKERS currently does not use overseas web and IT providers.

THIRD PARTY INTERESTS – OUR DATA PROCESSORS

Name of Third Party	Purposes for Carrying out Processing
IT maintenance	IT Consultant
Fast hosts	Web site
British Telecom	Email Provider
Mobile phone / Vodafone	Receiving messages
Account imputing	Business accounting
Invoice2Go	Account processing

COMPLAINTS?

In addition to sending us your complaints directly to you can send dwpropertyco@btconnect.com complaints to our supervisory authority which is the Information Commissioner's Office. If you believe that we have failed in our compliance with data protection legislation, complaints to this authority can be made by visiting <https://ico.org.uk/concerns/> .