

## Privacy Policy v1 May 2022

**Your privacy is important to us. This policy describes our approach to collecting, storing and using any data we have about you and your rights in respect of that data.**

You may have heard of the General Data Protection Regulations (GDPR) which were introduced by the European Union in 2018. In the UK, these regulations are set into law by the Data Protection Act 2018. This legislation provides you as an individual various rights in respect of the data any commercial business hold about you. In brief, businesses and organisations such as Stephen Michael Surveying Limited (trading as Stephen Michael Surveying) have a duty to ensure that any information held about you is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

At Stephen Michael Surveying, we take protection of your data seriously. With this in mind, we set out below our approach to complying with these requirements and ensuring your privacy.

### **What data do we collect?**

We collect data from you (for example, when you complete a web contact form or when you correspond with us by mail, phone, email or speak to us in person) and we sometimes receive data from other sources (including, for example, business partners and sub-contractors).

The data we collect and hold includes:

- Name;
- Address;
- Telephone number and email address;
- Details of any properties you have discussed with us or engaged us to provide services for, including details such as the property's address, market value, number of bedrooms, floor area, condition concerns, your plans for the property etc.

In addition to these basic details, we will sometimes ask you to complete a health and safety risk assessment form as part of our standard on-boarding process. This will collect information necessary to ensure our surveyors' health and safety during the inspection.

### **What about sensitive data?**

We do not collect any data whatsoever on sensitive subjects, such as your race, ethnicity, gender, political opinions, religious beliefs, health or sexual orientation.

### **Do we use cookies and other tracking technologies?**

We may use cookies and similar tracking technologies but only where we have your express consent to do so. Specific information about how we use such tracking technologies and how you can refuse certain cookies is set out in our Cookie Notice.

### **How do we use your data?**

Any data collected will only be used for the purposes of delivering our surveying / property consultancy services to you, unless we agree otherwise. This may include holding your details in a database and on emails etc. We may on occasion send marketing communications via email. Where you are included on such lists, you will be informed of this beforehand. You can request to be removed from these lists at any time by contacting us.

We may share personal data we hold with any member of our company or organisation.

We may also disclose personal data we hold to third parties in very limited circumstances as follows:

- a) As a RICS regulated firm, external organisations may conduct audit or quality assurance reviews on our practice. Your file and data may be subject to monitoring and review, and we will need to provide this to RICS on request in accordance with RICS Rules of Conduct for Members and/or RICS Rules of Conduct for Firms.
- b) In the event that we sell or buy any business or assets, in which case we may disclose personal data we hold to the prospective seller or buyer of such business or assets.
- c) If we or substantially all of our assets are acquired by a third party, in which case personal data we hold will be one of the transferred assets.
- d) If we are under a duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with you or other agreements; or to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We will not sell or otherwise transfer your data to any third party for any other reason except as required in the usual carrying out of our services, or as required under UK law.

### **What if we hold incorrect data about you?**

We endeavour at all times to ensure our data is up to date and accurate. However, if you notice any of the data we have is incorrect, we ask that you please let us know so we can update this.

### **How long do we keep your data?**

In light of common law, and RICS guidelines, we need to keep records of the services provided for certain periods of time. These time periods vary depending on the nature of the services provided and the need for data retention currently ranges between 6 years and 15 years.

We will not keep records for any longer than necessary and, once the appropriate time period has elapsed, data will be securely deleted.

### **How do we keep your data safe?**

Any data we hold is kept on password-protected systems to ensure that this cannot be accessed by unauthorised parties. We may store some data in a password protected online cloud-based storage services provided by reputable third parties.

Systems are also in place to preserve the security of any physical paperwork and to ensure personal data is not access by, or communicated to, unauthorised third parties.

### **What are my rights?**

Under the Data Protection Act 2018, you have the right to find out what information we store about you. These include the right to:

- be informed about how your data is being used;
- access personal data;
- have incorrect data updated;
- have data erased;
- stop or restrict the processing of your data;
- data portability (allowing you to get and reuse your data for different services);
- object to how your data is processed in certain circumstances.

If you would like a copy of the data we hold about you, you may request this at any time. We may charge a small administration fee to cover the cost of our time in compiling this. You may also at any time request that we erase information we have about you or to restrict our ability to process / use your data. To do this, please contact us in writing, such as by email or letter. If at any time you have any concerns about the way we have collected or used your data, please contact us in the first instance. If you wish to make a further complaint, this can be directed to the Information Commissioner's Office who can be contacted at:

[www.ico.org.uk](http://www.ico.org.uk)