



PRIVACY NOTICE

Goodwin Fox treats the privacy of its clients and website users very seriously and we take appropriate security measures to safeguard your privacy. This policy explains how we protect and manage any personal data* you share with us and we hold about you, including how we collect, process, protect and share that data.

**Personal data means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home or other physical address and an email address or other contact information, whether at work or at home.*

HOW WE OBTAIN YOUR PERSONAL DATA

Information provided by you

You provide us with personal data either in person, over the telephone or via email, this includes your name, address, date of birth, email address along with other sensitive information if it is necessary for us to deal with your matter. Depending on the circumstances of the matter we deal with this information may be sensitive. We use this information in order to provide you with the estate agency services you have requested us to deal with on your behalf.

The provision of this personal data is essential for us to provide you with effective and accurate estate agency advice; this means the legal basis of our holding your personal data is for the performance of our contract with you.

Information we get from other sources.

We may also obtain information about you from third parties such as a Property Portal such as Rightmove, On the Market, or solicitor, financial advisor or other agency if this is permitted by law. We also may use legal public sources to obtain information about you for example, to verify your identity.

This information (including your name, address, email address, date of birth etc.) as relevant to us, will only be obtained from reputable third-party companies that operate in accordance with General Data Protection Regulations (GDPR). You will already have submitted your personal data to these companies and specifically given permission to allow them to pass this information to other companies that provide similar or complementary products and services to those we offer.

In the processing of your property service we may need to record information relating to a 3rd party who we have a legitimate interest in ie, purchaser of your property, or another party who you wish to have a contract with. We will only hold their information for as long as is deemed necessary.

HOW WE USE YOUR PERSONAL DATA

The data and information we hold about you in dealing with your matter will be for example:

- | | | |
|----------------|---|---|
| Name & Address | - | letters sent to you |
| Email | - | emails sent to you |
| Bank details | - | any money we receive and need to send to you |
| Date of birth | - | used for forms and applications and verification of identity. |

Do we use your personal data for marketing purposes?

Any information you choose to give us will not be used for marketing purposes by us or given to any third party for this purpose. We will hold your personal data only for the purpose of providing you with the estate agency services you require us to provide for you.

SHARING INFORMATION

During the time we act for you and in order to properly deal with your matter, we may find it necessary to share your details with a third party. This could include our property software providers, anti money laundering software, Energy Performance Certificate assessors, Land Registry, solicitors, other estate agents in your chain etc. We do not have in house tied services but can refer you to such services as surveyors, mortgage advisors and solicitors but only if you request this.

Transfer of your personal data outside of the European Economic Area (EEA)

We do not currently transfer your personal data outside the EEA. If in the future we need to transfer your personal data, we will make sure that the receiver agrees to provide the same or similar protection as we do and that they only use your personal data in accordance with our instructions. If we do need to correspond with a country outside the EEA we will seek your written consent prior to us providing them with any personal data.

How long do we keep information about you

Once your property matter has been completed we are obliged to keep your file for 6 years. This is in line with our governing body Guidelines. After a period of 6 years files are destroyed.

DATA SUBJECT RIGHTS

Subject access requests

The General Data Protection Regulation (GDPR) grant you (sometimes referred to as the 'data subject') the right to access particular personal data we hold about you. This is referred to as a 'subject access request'. We will respond promptly, and certainly within one month from the point of receiving a subject request, and provide you with all requested information about you. Our formal response will include details of the personal data we hold about you, including the following:-

- Sources from which we acquired the information;
- The purposes for processing the information; and
- Persons or entities with whom we are sharing the information.

RIGHT TO RECTIFICATION

You have the right to ask us and for us, to deal with, without undue delay, the rectification of any inaccurate personal data we hold concerning you. Taking into account the purpose of us having and using the information about you, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

RIGHT TO ERASURE

You have the right to ask us to erase any of personal data concerning you without undue delay after the period the NAEA or ARLA requires us to keep the information regarding the matter we deal with on your behalf, providing we are not obliged to keep the data longer for Legal reasons.

RIGHT TO RESTRICTIONS OF PROCESSING

Subject to exemptions, you have the right to obtain from us a restriction limiting our ability to process personal data concerning you where one of the following applies:

- The accuracy of the personal data is contested by you, and is restricted until the accuracy of the data has been verified;
- The processing is unlawful and you, oppose the erasure of the personal data and instead request the restriction in its use;

- We no longer need the personal data for the purposes of processing, but it is required by you, for the establishment, exercise or defence of legal claims
- You, have objected to processing of our personal data pending the verification of whether there are legitimate grounds for us to override these objections.

NOTIFICATION OBLIGATION REGARDING RECTIFICATION OR ERASURE OF PERSONAL DATA OR RESTRICTION OF PROCESSING

We communicate any rectification or erasure of personal data or restriction of processing as described above to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort and cost. We shall provide you with information about those recipients if you request it.

RIGHT TO DATA PORTABILITY

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller, without hindrance from us.

RIGHT TO OBJECT

You shall have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you, including any personal profiling; unless this relates to processing that is necessary for the performance of a task carried out in the public interest or an exercise of official authority vested in us. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for processing which override the interests, rights and freedoms of you, the data subject, or for the establishment, exercise or defence of legal claims.

RIGHT TO NOT BE SUBJECT TO DECISIONS BASED SOLELY ON AUTOMATED PROCESSING

We do carry out some automated processing on a tenancy application, which may lead to an automated decision based on your personal data. However, a final decision is not based solely on such automated processing.

INVOKING YOUR RIGHTS

If you would like to invoke any of the above data subject rights with us, please write to The Data Protection Officer at Goodwin Fox, 181 Queen Street, Withernsea, HU19 2JR.

ACCURACY OF INFORMATION

In order to provide the highest level of customer service possible, we need to keep accurate personal data about you. We take reasonable steps to ensure the accuracy of any personal data or sensitive information we obtain. We ensure that the source of any personal data or sensitive information is clear and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information, such as name or address changes and you can help us by informing us of these changes when they occur.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website however.

If you wish to restrict, block or delete cookies provided by this website or any other website - you can use your browser to do this. Each browser is different so check the "Help" menu of your particular browser to learn how to change your cookie preferences.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Third Party Cookies

To help improve your experience of our site we use content from other sites to help users and improve usability for example Google Maps for property locators or You Tube for Video. We do not control these sites and we suggest you read their cookie policy to see which ones they use and how to manage them.

What we do with the information we gather from Client Satisfaction Surveys

We use the feedback to understand your needs and provide you with a better service. We may use your comments on our testimonial page on the website but these will remain anonymous.

IMPORTANT INFORMATION

Questions and Queries

If you have any questions or queries which are not answered by the Privacy Notice, or have any potential concerns about how we may use the personal data we hold, please write to the Data Protection Officer at Goodwin Fox, 181 Queen Street, Withernsea, HU19 2JR.

Policy changes

This privacy policy is regularly reviewed. This is to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this policy. We suggest that you review this Privacy Policy from time to time to ensure you are aware of any changes we may have made, however, we will not significantly change how we use information you have already given to us without your prior agreement. The latest version of this policy can be found at <https://www.goodwinfox.com/privacy>.

If you have a complaint

If you have a complaint regarding the use of your personal data or sensitive information then please contact us by writing to the Data Protection Officer at Goodwin Fox, 181 Queen Street, Withernsea, HU19 2JR.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioners Office (ICO) you can contact them on 01625 545745 or 0303 123113.