

Grace Samuel Estates Ltd is committed to ensuring that your privacy is protected and our use of your personal information is governed by this Privacy Notice. On this site, “Grace Samuel Estates Ltd”, “Madison Harper”, “our” and “we” each mean all the UK companies including but not limited to Grace Samuel Estates Ltd Company Number: 13120069. Any reference to “you” or “your” refers to anyone whose personal information we process.

1. Introduction

Our use of your personal data will be governed by this Privacy Notice.

Grace Samuel Estates Ltd is a controller for the personal information that it collects and uses about you. We will treat your personal information as confidential and in accordance with applicable data protection legislation and your personal information will only be shared with others in accordance with this Privacy Notice.

This Privacy Notice explains;

- What personal information is
- How we collect your personal information
- The types of personal information we collect
- How we use your personal information
- The legal basis for processing your personal information
- How we share your personal information
- How long we keep your personal information
- How we keep your personal information secure
- Overseas transfers of your personal information
- Your rights in relation to your personal information
- How to make complaints and how to contact us

If there are any changes to the way in which your personal information is used, this Privacy Notice will be updated.

2. What is personal information

Personal information is any information that tells us something about you. This could include information such as name, contact details, date of birth, bank account details or any information about your needs or circumstances which would allow us to identify you.

Some personal information is classified as “special” data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious beliefs or political opinions and sexual orientation. This information is more sensitive and we need to have further justifications for collecting, storing and using this type of personal information. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data.

Any references to personal information in this privacy notice will include personal data, and where relevant, special categories of personal data.

3. What personal information do we collect?

We will collect your full name and contact details (such as phone number, email address and postal address) from you whenever you engage with us.

In addition, if we are providing a service to you, or on your behalf, where we are required to do so by law, we will collect information relating to your identity, which will be at least one form of photographic identification (such as a passport, a driving licence or an identification card) and one form of documentation with proof of your place of residence (such as a recent utility bill).

We will also confirm whether you have any relatives or close connections working at Grace Samuel Estates Ltd so that we can consider potential conflict of interests and if identified how to manage these, in accordance with our statutory and regulatory obligations.

Depending on the service that we provide to you (or on your behalf) we may also collect additional personal information as detailed below;

Buying, Selling, Letting & Rent

If you are buying, selling, letting or renting a property through us;

- We will collect your contact details to get in touch with you about new properties to the market, organising viewings and updating you on any offers placed.
- We will collect your contact details to get in touch with you about organising viewings and updating you on any offers received on your property.
- Where you are not the legal owner of the property we will request details from you as to your ability to sell or let the property such as a Power of Attorney, Guardianship Order or Grant of Probate.
- Where you engage with Grace Samuel Estates Ltd, we may collect information required to identify you to meet anti-money laundering and counter terrorist financing requirements.
- If we are dealing with an entity such as a company, trust or charity, we may need to obtain personal information for the beneficiaries of the entity and those in a position of control. This will include, but is not limited to, identity and address documents. We may also need to collect information on other individuals who have an interest in the property who are not considered to be our customers.
- We may collect your bank account details to arrange payments to you.
- We may collect/request proof of cash and or financing. You are not obligated to provide these however we will require confirmation from a certified accountant or solicitor.
- Where we are working alongside third parties such as solicitors, developers, joint or multi agents, we may need to share these documents on the basis of legitimate interests.
- If you wish to purchase a property we are listing for sale where you have specifically provided us with these, we will collect personal information relating to any specific access requirements you may have in relation to a property so that we can find a property that is suitable for your needs. We will also collect personal information required to source a property for you and, where required, negotiate the purchase of a property on your behalf.
- If you wish to view a property with us, we will require your full name, contact details (phone & email) and postal address. This is for security reasons. 1. To ensure the safety of our team attending the viewing. 2. To ensure the safety of our client's property. Should there be any kind of incident at the property, the police will want a list of all people who have visited the property.
- UKCreditRatings.com is a trading name of RSDDataTech Ltd (Registration No. 8282923): No data is shared, unless you request to review your credit file and supply your data willingly.
If you wish to rent a property we are listing;
- Specific access requirements so that we can find a property that is suitable for your needs
- Your bank / building / similar account details to allow us to manage an approved tenancy deposit account for you and to set up your rental payments.

- If you are a tenant renting under the 'Right to Rent' scheme we will collect details of your Biometric residence card, your immigration status document and/or your birth certificate to carry out our required checks under this scheme
- Under our HMRC obligations, we may also need to collect specific identity documents from you for the purpose of preventing and detecting crime, fraud or money laundering.

Property Management

- Where we engage with you to manage property on your behalf we will ask for additional emergency contact information in case we need to get in touch with you outside of working hours or in the event there is a matter requiring your urgent attention.
- Where you engage us for portfolio management services we will share your personal information with third party lenders as is necessary to allow us to fulfil our obligations to you and to properly manage and advise you on your property investments.
- Where you are a tenant in a building managed by Grace Samuel Estates Ltd, we may need to share your personal information with the property owner, but will only do so where we have considered your own rights first.
- Where we operate CCTV in a property, we may capture your image which would constitute your personal data.

Investment Management

- Where you engage with Grace Samuel Estates Ltd as an individual investor we will collect information required to identify you to meet anti-money laundering and counter terrorist financing requirements.
- If the investor is an entity such as a company, trust or charity, we may need to collect personal information about the controllers and the beneficiaries of the entity.

Other

- If you subscribe to receive research, news or other market updates from us, then in addition to the above we will collect details about the sector in which you work and the type of content that you would like to receive.

4. How we use your personal information

What is the legal basis of our data processing?

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so. We rely on the following legal bases to use your information;

- For employment-related purposes
- Where we need information to perform the contract we have entered into with you
- Where we need to comply with a legal obligation
- Where the processing is necessary for us to carry out activities for which it is in Grace Samuel Estates Ltd legitimate interests (or those of a third party) to do so and provided that your interests and fundamental rights do not override those interests, including:

- Processing that is necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns – this will include sending you marketing information from time to time after you have engaged us to provide services or received services from us either which may be similar and of interest to you or where you have expressly indicated that you would like to receive such information. You have the right to opt out of receiving this information at any time.
- Processing that is necessary to improve our knowledge of the real estate sector – this will include undertaking market analysis and research so that we better understand trends in the property sector and provide better knowledge along with more tailored and relevant services for our customers in the future.
- Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively – this will include verifying the accuracy of information that we hold about you and create a better understanding of you as a customer; processing for administrative efficiency purposes such as where we outsource certain administrative functions to third parties who are specialise in such services; processing for network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access or to comply with a request from you in connection with the exercise of any of your rights outlined below.

In more limited circumstances we may also rely on the following legal bases:

- Where we need to protect your interests (or someone else's interests); and/or
- Where it is needed in the public interest or for official purposes
We may process special categories of personal information and criminal conviction information in the following limited circumstances:
- With your explicit consent, in which case we will explain the purpose for which the information will be used at the point where we ask for your consent.
Specific information on how your personal information will be used for the particular services you have requested from us is provided below.

Buy, Sell, Let, Rent

- We use your personal information for the purposes of fulfilling our obligations to you to let or sell your property or, if you are a buyer or tenant, for the purposes of arranging viewings, obtaining feedback, and arranging a contract for sale or a lease for you.
- We will use your personal information to conduct due diligence in accordance with other legal or regulatory obligations
- We will share your personal information with your appointed solicitors and the solicitors and agents acting for the other side of the deal as is necessary to facilitate the sale or purchase. We may also share your personal information with joint or multi agents or developers, as the case may be.

- We will share your personal data with third party referencing agencies for the purposes of the prevention and detection of crime, fraud and/or money laundering and checking your suitability to rent that property.
- We will share your details with third parties such as mortgage advisors, solicitors, removal companies where you have specifically asked.

Property Management

- Where we are managing property on your behalf we may need to pass your personal information from time to time on to third party contractors whom we have engaged to carry out maintenance on your properties.
- We operate CCTV in properties based on our legitimate interest in protecting the property and ensuring the safety of visitors, tenants and clients, as well as to assist with the prevention and detection of crime.

Investment

- Where you engage us for portfolio management services we will share your personal information with third party lenders as is necessary to allow us to fulfil our obligations to you, to raise finance for you and to properly manage and advise you on your property investments.
- Where you engage with Grace Samuel Estates Ltd Investment Management we will collect and hold your personal data to maintain a register of investment holdings in order to comply with our Financial Conduct Authority requirements.

Finance

We may pass your personal data to our recommended partners, on a referral basis in relation to the arrangement of financing to allow you to acquire a property and/or the provision of the following services:

- if you are purchasing a property under the Help to Buy scheme we will disclose information which needs to be provided to the scheme operators to check your eligibility and to allow you to participate in and obtain benefits from the scheme;
- if you are obtaining mortgage brokerage services we will disclose personal information that needs to be submitted lenders (and if you are a high value mortgage customer, private banks) in order to fulfil our obligations to seek funding options for you;
- if you are an insurance customer we will disclose information to be sent to a selected panel of insurance providers in order to obtain suitable options for insurance products for your requirements.

Other uses of your personal information

- If we sell any part of our business and/or integrate it with another organisation your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their advisers. If this occurs the new owners of the business will only be permitted to use your information in the same or similar way as set out in this privacy notice.

- We will share personal information with our regulators, governmental or quasi-governmental organisations, law enforcement authorities and with courts, tribunals and arbitrators as may be required from time to time in order to comply with our regulatory and legal obligations.
- Where we use third party services providers who process personal information on our behalf in order to provide services to us. This includes IT systems providers and IT contractors as well as third party referencing or screening agencies for the purposes of the prevention and detection of crime.
- We may share your personal information with any person working within the Grace Samuel Estates Ltd Group on a need to know basis to ensure we are able to perform our obligations to you.
- We will hold your personal information on our client management systems and use this to provide you with marketing information about similar services offered by Grace Samuel Estates Ltd to those which you have engaged us to provide which we feel you might find useful from time to time. You have the opportunity to opt out of receiving this information at any time.

What happens if you do not provide information that we request?

We need some of your personal information to perform the services you have requested from us. For example:

- where we are selling a property on your behalf we need to know your contact information so that we can update you with information on viewings, offers and the progress of the sale; and
- where you have asked us to find you a property which meets certain requirements, we may need to know some further details about your particular circumstances so that we can find you a suitable property.

We also need some information so that we can comply with our legal obligations. For example, we may need identity documents from you to meet our obligations to prevent fraud and money laundering.

If you do not provide the information required for these purposes, we will not be able to perform our contract with you and may not be able to provide services to you or continue to provide certain services to you. We will explain when this is the case at the point where we collect information from you.

5. How we keep your information secure

The security of information is very important to us and we have measures in place which are designed to prevent unauthorised access to your personal information including but not limited to:

- Our client files are stored on our secure client management systems. Access is restricted on our client systems to those within the business who are required to have access to your information for legitimate business purposes.
- Hard copy documentation is stored in locked cabinets.
All data is hosted in datacentres which have systems and protections in place to protect against both unauthorised access, and other external factors that could cause damage to your personal data. There are strict access requirements in place and access is restricted to those absolutely necessary.

We ensure access to personal information is restricted to Grace Samuel Estates Ltd employees and workers or other persons working within the Grace Samuel Estates Ltd Group on a need to

know basis. Training is provided to any of those Grace Samuel Estates Ltd employees and workers who need access to personal information.

6. For how long do we keep your personal information

The period for which we will keep your personal information will depend on the type of service you have requested from us. The usual period is 5 years. The retention period may be longer than the period for which we are providing services to you where we have statutory or regulatory obligations to retain personal information for a longer period, or where we may need to retain the information in case of a legal claim.

7. Overseas transfers of your personal information

We may transfer, store, or process your personal information in locations outside the UK and the European Economic Area (EEA). Where the countries to which your personal information is transferred do not offer an equivalent level of protection for personal information to the laws of the UK, we will ensure that appropriate safeguards are put in place.

We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the European Commission Justice website.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here on the European Commission Justice website.
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. You can find out more about data protection on the European Commission Justice website.

8. Your rights in relation to your personal information

You have a number of rights in relation to your personal information, including the right to:

- Be informed about how we use your personal information
- Obtain access to your personal information that we hold
- Request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate
- Request that we erase your personal information in the following circumstances:
 - If Grace Samuel Estates Ltd is continuing to process personal information beyond the period when it is necessary to do so for the purpose for which it was originally collected
 - If Grace Samuel Estates Ltd is relying on consent as the legal basis for processing and you withdraw consent
 - If Grace Samuel Estates Ltd is relying on legitimate interests as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us continue with the processing
 - If the personal information has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation)
 - If it is necessary to delete the personal information to comply with a legal obligation
- Ask us to restrict our data processing activities where you consider that:

- personal information is inaccurate
- our processing of your personal information is unlawful
- where we no longer need the personal information but you require us to keep it to enable you to establish, exercise or defend a legal claim
- where you have raised an objection to our use of your personal information
- Request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need in order to perform our agreement with you and personal information where we are relying on consent to process your personal information
- Object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information; and
- Not be subject to wholly automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights please contact hello@madisonharper.co.uk. Please note that we will keep a record of the fact that you have made a request to exercise your rights, and our response to your request, in order to demonstrate compliance with our data protection obligations and so that we can handle any queries, complaints or claims in relation to your request. This record will be kept in accordance with our retention policies at section 6 above.

9. **Complaints and Contact Details**

Complaints

If you have any complaints about the way we use your personal information please contact our office at hello@madisonharper.co.uk who will try to resolve the issue. If we cannot resolve any issue, you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK). If you need more information about how to contact your local data protection authority please let us know by contacting hello@madisonharper.co.uk.

Contact details

If you have any questions, comments or requests regarding any aspect of this Privacy Policy, please do not hesitate to contact us by sending an email to hello@madisonharper.co.uk or writing to Grace Samuel Estates Ltd, Suite 9, Kelvin House, Kelvin Way, Crawley, RH10 9WE

10. **The use of cookies by Grace Samuel Estates Ltd**

What is a cookie?

A cookie is a small text file that is downloaded onto your computer when you visit certain websites and allows a website to recognise a user's computer. Cookies are used to help users navigate websites more efficiently and to perform certain functions, as well as to provide information to the owners of the website.

What cookies do Grace Samuel Estates Ltd use?

Below is a list of the cookies used by this website and provides a description of how each cookie works. Where further information about a cookie exists on an external website a link has been provided under 'More information'

Facebook;

Purpose

Facebook, may use cookies, web beacons, and other storage technologies to collect or receive specific types of information and Grace Samuel Estates Ltd may use that information to provide targeted ads.

More information

For more information: <https://en-gb.facebook.com/help/568137493302217>

Google Adwords;

Purpose

The Grace Samuel Estates Ltd Website uses Google Adwords to remarket or use similar audiences to display adverts on other 3rd party websites.

More information

To opt out: <https://support.google.com/ads/answer/2662922?hl=en-GB>

Google Analytics;

Purpose

The Grace Samuel Estates Ltd Website uses Google Adwords to remarket or use similar audiences to display adverts on other 3rd party websites.

More information

To opt out: <https://support.google.com/ads/answer/2662922?hl=en-GB>

Hotjar;

Purpose

Hotjar allows us to understand what users do on our site by visually (and anonymously) representing their clicks, taps, and scrolling behaviour.

More information

For more information visit the Hotjar site – <https://www.hotjar.com/legal/policies/privacy>

Twitter;

Purpose

The Grace Samuel Estates Ltd Website uses Twitter ads to remarket or use similar audiences to display adverts on Twitter.

More information

<https://help.twitter.com/en/safety-and-security/privacy-controls-for-tailored-ads>

How do I restrict or delete cookies?

13 of the cookies we use are essential for parts of the website to operate and have already been set. You may delete and block all cookies from this website, but please be aware that restricting or deleting cookies may impact on the functionality of the website.

Your web browser may allow you to restrict or delete cookies set by this website. The Help function within your browser should tell you how. Alternatively, you can visit www.allaboutcookies.org which provides general information about cookies and how you can manage cookies on your computer.

To opt out of being tracked by Google Analytics across all websites

visit <http://tools.google.com/dlpage/gaoptout>.

How do I contact the Information Commissioners Office?

You can visit their website here: <https://ico.org.uk/>