

## PRIVACY NOTICE

1. This is the privacy notice of Charterwood Commercial Property Consultants Limited. In this document, "we" or "us" refers to Charterwood (CPC) Limited.
2. Charterwood (CPC) Limited are committed to protecting and respecting your privacy. This Policy explains how we collect personal data, how we use it and who we might share it with.
3. We may review this policy from time to time so please do check for updates. If you have any questions about this privacy policy or the way we process personal data please send an email to Stuart Sly [stuart@charterwood.com](mailto:stuart@charterwood.com). Alternatively, you can write to Stuart Sly, Charterwood (CPC) Limited, 17A River Street, Truro, Cornwall TR1 2SQ.
4. We are company number 04916920 registered in England & Wales.
5. Our registered office is at 17A River Street, Truro, Cornwall TR1 2SQ.
6. We are also registered with the Information Commissioner Office as a data controller (Registration Number Z3398849).
7. If there are any changes to the way in which your personal information is used, this Privacy Notice will be updated.
8. This is a notice to tell you our policy about all information that we record about you. It covers both information that could identify you and information that could not.
9. 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.
10. What personal information do we collect?
11. 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). Depending on the service that we provide to you (or on your behalf) we may also collect additional personal information as detailed below:

12. If you are selling or letting a property through us:
  - We will collect a contact telephone number to get in touch with you about organising viewings and updating you on any offers received or rental applications for 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.

13. If you wish to purchase/lease a property we are listing for sale where you have specifically provided us with these, we will collect personal information relating to any specific requirements you may have in relation to a property so that we can find a property that is suitable for your needs. We may also collect personal information required to source a property for you and, where required, negotiate the purchase of a property on your behalf.
14. 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. We will collect information required to identify you to meet anti-money laundering and counter terrorist financing requirements. If you are 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.
15. How we use your personal information.
16. 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 Charterwood's 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 of 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 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.

17. 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.

18. 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 a contract for sale or a lease for you, your identity details may be passed to our clients (and/or their advisors, e.g., solicitors, accountants, surveyors, trustees) where you have shown an interest in their property.
- If you are purchasing a property where we are acting as agents for the sale of, or where you are selling a property through us, we will share your personal information with your appointed solicitors and the solicitors acting for the other side of the deal as is necessary to facilitate the sale or purchase.
- If you are renting a property where we are acting as letting agents, 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.

19. 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.

20. Other use 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 service 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 prevention and detection of crime.
- 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 Charterwood 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.

21. Anti-Money Laundering

In addition to help you with a property related service we have to comply with certain regulations for example the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to as the Regulations). We are required to obtain certain information from you to comply with regulations. The information provided will only be used by us in relation to complying with the Regulations and will not be shared with any other party outside of our company unless we are required to do so under law. If you decide to enter into a business relationship we will require two separate identification documents, one primary and one secondary document, even if it appears on both lists.

22. Primary documents – proof of ID

23. Valid Passport.

Valid full UK photo driving licence.

Valid full UK driving licence (non-photo, paper) issued before 1998.

Valid EU/EEA/Switzerland photo driving licence.

Valid EU/EEA/Switzerland national Identity Card.

Valid UK Armed Forces ID Card.

Valid UK Biometric Residence Permit (copy of both sides).

Valid Blue disabled drivers pass (with photo).

Valid Freedom Pass.

Valid Local Authority Bus pass.

Department for Works & Pensions letter confirming pension details including National Insurance Number dated within the last 12 months.

24. Secondary documents – proof of residence (home)

25. Valid full UK photo driving licence.

Valid full UK driving licence (non-photo, paper) issued before 1998.

Local authority council tax bill (dated within the last 12 months).

UK Bank/Building Societies statements/bills showing activity, dated within the last six months including account number and sort code (internet printed acceptable).

UK mortgage statement (dated within the last 12 months) (internet printed acceptable).

Utility bill dated within the last 6 months including – electricity bill (with MPAN number), landline, gas, satellite, TV, water (internet printed acceptable) – (not mobile phone bills).

Her Majesty's Revenue and Customs (HMRC) Inland Revenue (IR) Coding/assessment/statement (dated within the last 12 months) with National Insurance number.

Department for Works and Pensions letter confirming pension details and NI Number (dated within the last 12 months).

26. We reserve the right to employ third party electronic verification for the purpose of verifying identity. This search will not affect your credit rating.

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

28. 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;
  - 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.
29. 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.
30. How we keep your information secure.
31. 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 store in a secure office.
32. 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 Charterwood employees and workers on a need to know basis. Training is provided to any of those Charterwood employees and workers who need access to personal information.
33. 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 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.
34. Your rights in relation to your personal information
- You have a number of rights in relation to your personal information, these include 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 Charterwood 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 Charterwood is relying on consent as the legal basis for processing and you withdraw consent
- If Charterwood is relying on legitimate interests as the legal basis for processing and you object to this processing and there is no over-riding compelling ground which enables us to 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 over-riding 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 [stuart@charterwood.com](mailto:stuart@charterwood.com).

## 35. Complaints and Contact Details

### Complaints

If you have any complaints about the way we use your personal information please contact the Customer Relations Officer at [stuart@charterwood.com](mailto:stuart@charterwood.com) 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 [stuart@charterwood.com](mailto:stuart@charterwood.com).

## 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 [stuart@charterwood.com](mailto:stuart@charterwood.com).

### 36. The use of cookies by Charterwood (CPC) Limited

#### 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 Charterwood use?

Cookies may be used by this website for analytical purposes, no personal data is captured.