

PRIVACY POLICY

Robsons understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, https://www.robsonsweb.com ("Our Website") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

This privacy notice sets out how we will process personal data we collect from or about you, or which you provide to us. Please read this notice carefully to understand why data is being collected and what we do with that data.

Information about us

"Robsons" is a trading name and incorporates:

- Robsons (Amersham) LLP (Company Registration Number: OC316837);
- Robsons (Northwood) LLP (Company Registration Number: OC316836);
- Robsons (Pinner) LLP (Company Registration Number: OC327555);
- Robsons (Rickmansworth) Limited (Company Registration Number: 08852720); and
- Robsons Residential Lettings Limited (Company Registration Number: 07557114).

Further details of our companies under the Robsons umbrella are available under company information on Our Website which is https://www.robsonsweb.com

The scope of this notice

This Privacy Notice applies to your use of your Website located at www.robsonsweb.com and services. Our Website and services may contain links to independent websites which are not provided by us. We have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be immediately posted on Our Website and you will be deemed to have accepted the terms of the Privacy Notice on your first use of Our Website following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Notice was last updated in June 2022.

For the purpose of the General Data Protection Regulation (GDPR) and The Data Protection (Charges and Information) Regulations 2018, the data controller is Robsons.



What Is personal data?

"Personal data" is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

What are my rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details contained within this Notice.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.



How do we use your personal data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What we Do	What Data we Use	Our Lawful Basis
Administering Our Site including monitoring how our website is used to help us improve the website to make it more userfriendly.	Device information, IP address, analysis of website navigation via cookies and other technologies	Legitimate Interests
Supplying Our services to you including communicating with you about the services you require and managing payments for Our services. We may also share your information with others where necessary to fulfil our property services for you or where acting as agent for a third party on your behalf	Contact details (name, address, postcode, phone number), financial details (credit and debit card details etc), address.	Contract
Personalising and tailoring Our services for you and information on any access requirements you have necessary to enable us to find suitable properties for you, which may consist of special category personal data comprising details of any disability or other health information about you	Name, email address, day and month of birth, disability and health information, and other property preferences.	Consent
I.D. Verification	Name, address, passport or driving licence number	Consent and legal obligation
Where you are letting a property or, where renting, to set up an approved tenancy deposit account for you and arrange for rental payments	Name, Banking Details, credit/ debit card details and address	Consent and legitimate interests
We store records of all communications with you to ensure a personalised and tailored up to date service	Name telephone number, and email address	Legitimate interests
Supplying you with information by email of marketing information about similar products and services that you have opted-in to or to	Name, email address, browsing, details about your locations of interest, and date of consent.	Consent and legitimate interest



enable group companies and third parties to provide you, with information about goods or services we feel may interest you, where you have provided permission for us to do so		
When we have a service message we need to send you via email informing you of any changes that might affect our service to you or changes to terms and conditions	Name and email address.	Consent and legitimate Interest
When you purchase or make an application to lease a property, we will use some of your personal data to carry out anti-fraud and anti-money laundering money activities: we have a legitimate interest in carrying out this activity to prevent and prosecute any fraudulent activity.	Name, address, email address, phone number, banking details, sources of funds.	Legal obligation
We may use your data to establish or exercise our legal rights or to defend against any legal claims.	Identification data and other personal data that may be relevant to the specific legal claim.	Legitimate Interest
When you make a request for our services, we are required to process your personal data to meet our legal obligations in accordance with the tax provisions and other statutory rules which apply.	Contact details and details of your financial transaction with us.	Legal Obligation
When we process your information in response to you exercising your data subject rights.	Name, contact information, other information you have specifically requested.	Legal Obligation

We also process usage information about your visits to Our Website (which enable Our Website to remember information about you and your preferences) and use of our site (Please read our 'Cookie Policy' located at https://www.robsonsweb.com);

Where we need to collect personal data by law (for example to meet our obligations to prevent fraud and money laundering) or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may not be able to provide the service to you.



How and where will we store your data?

We will only store your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

Personal data security is essential to us, and to protect personal data, we take the following measures:

- limiting access to your personal data to those employees, agents, contractors, and other third
 parties with a legitimate need to know and ensuring that they are subject to duties of
 confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

How long we keep your data for?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept in accordance with our Retention Policy.

Who your information will be shared with

When you register with us via our website, we share your data between the three entities listed above in order to provide the services to you.

Your personal data will also be transmitted to third parties that we use to provide our services; these parties may only use your data for the exact purposes that we specify in the contract with them.

The third parties in question belong to the following categories:

- Companies such as payment service providers that help us to process your order.
- Companies that help us to deliver your service requests
- Professional service providers, such as, solicitors, IT software providers, marketing and research agencies, analytics companies and website hosts who help us to run our business,
- Credit reference agencies, law enforcement and fraud prevention agencies, so we can help tackle fraud.
- Governmental bodies and regulators to comply with our legal obligations.



If any of your personal data is transferred to a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Notice (i.e. to communicate with you).

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal or regulatory obligations, a court order, or the instructions of a government authority or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

You may request a list of all third party service providers by contacting Robsons.

Security of your data

Your data will be held on secure servers within the European Economic Area ("EEA") with all reasonable technological and operation measures put in place to safeguard it from unauthorised access. Where possible any identifiable information will be encrypted or minimised.

How you can access and update your information

You have a right to request a copy of the personal information we hold about you, known as a data subject access request. You also have the right to request that information we hold about you which may be incorrect, or which has been changed since you first told us, is updated or removed. Please contact your relevant office for further information.

How you can request erasure of your data

You can ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where you have withdrawn consent for us to process it (as explained below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with



your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

How you can withdraw your consent

You have the right at any time to withdraw any consent you have given us to process your personal data. Please note if you withdraw your consent it will not affect the lawfulness of any processing of your personal data we have carried out before you withdrew your consent. Should you wish to do so you can change your consent preferences by contacting your relevant office.

How you can restrict or object to us using your data

You can ask us to suspend the way in which we are using your information in certain scenarios, or object to our processing your data where we are relying on a legitimate interest ground (or those of a third party) and you feel it impacts on your fundamental rights and freedoms, or where we are processing your personal data for direct marketing purposes. In some cases where you object, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Please note that if you want us to restrict or stop processing your data this may impact on our ability to provide our services. Depending on the extent of your request we may be unable to continue providing you with our service.

Any queries or concerns about the way in which your data is being used you can contact your relevant office for further information.

Moving your information to another organisation

In the event that we process your data by automated means where you have either provided us with consent for us to use your information or where we used the information to perform a contract with you, you have the right to request that we send to you or to another organisation, a copy of the personal data we hold about you, for example when you are dealing with a different service provider. If you would like us to move, copy, or transfer your information please let us know by email to either:

<u>salesgdpr@robsonsweb.com</u> (Sales: Middlesex, Hertfordshire);
<u>lettingsgdpr@robsonsweb.com</u> (Lettings: Middlesex, Hertfordshire); or practice.manager@robsonsbucks.com (Sales: Buckinghamshire)

depending on which part of Robsons you are currently working with.



We will respond to you within one month after assessing whether or not this is possible, taking into account the technical compatibility with the other organisation in question.

How do I contact you?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Middlesex, Hertfordshire

Email address: simon.blitz@robsonsweb.com

Telephone number: 01923 835355

Buckinghamshire

Email address: practice.manager@robsonsbucks.com

Telephone number: 01494 724999

Complaints about the use of your personal data

If you wish to raise a complaint on how we have handled your personal data, you can contact your relevant office and have the matter investigated.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the UK data protection regulator, the Information Commissioner's Office. Further details can be found at www.ico.org.uk or 0303 123 1113.