
PRIVACY AGREEMENT

BACKGROUND:

Bexletts LTD t/a Ashton Reeves Estate Agents 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 all of our clients 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.

1. Information About Us

Bexletts Limited t/a Ashton Reeves.

Limited Company registered in England under company number 06719810.

VAT number: 978 372 661.

Main trading address: 67 Bexley High Street, Bexley, Kent, DA5 1AA.

Email address: info@ashtonreeves.co.uk.

Telephone number: 01322 559955.

We are regulated by The Property Ombudsmen.

We are a member of the Association of Residential Lettings Agents (ARLA) and the National Association of Estate Agents (NAEA)

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. 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.

The personal data that we use is set out in Part 5, below.

4. 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. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.

- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- 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. Please contact us using the details in Part 11 to find out more.
- 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. Part 6 explains more about how we use your personal data, including automated decision-making and/or profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

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.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

We may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data and/or personal data relating to children and/or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including Passport, Driving Licence, other official photo ID, Utility Bills, Statements or other official proof of address ID.	Electronic means sent by yourself and in person to see originals.
Contact information including Current	We will ask you to provide this to us verbally

Address, Telephone Number, Email Address.	and usually over the phone which may or may not be recorded for training and monitoring services.
Employment or Business information including your salary, wages or profit, proof of income via wage slips or official tax returns	Electronically sent in by yourself and originals seen in person.
Payment information including Bank Account details, Credit or Debit Card numbers, and adverse credit history such as County Court Judgements or defaults in making payments.	Verbally over the phone from yourself and/or via forms which you will be asked to complete.
Profile information including requirements for the type of property, size, location, your budget.	Verbally over the phone.
Data from third parties including income and affordability assessment.	Electronically via 3 rd party processes through referencing agencies such as Goodlord or Homelet.

6. How Do You Use My 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 business.	All of the above data listed in section 5	<p>To enable us to:</p> <p>Source appropriate properties for you.</p> <p>Communicate appointments, and documents; such as forms and agreements, and negotiate terms with yourself.</p> <p>Carry out referencing on you to establish your affordability and actual ability to meet financial obligations of the rental payments due.</p> <p>To verify you are who you say you are and that the home address provided is genuinely where you are living.</p> <p>To mitigate any fraudulent applications.</p>

		<p>Manage the collection of rental payments.</p> <p>Applications to any official agencies or bodies in relation to chasing any outstanding payments, arrears, or possession of property.</p> <p>Set up utility and council tax accounts in your name should you successfully rent a property.</p>
Supplying our services to you.	Profile information.	To enable us to: Source most suitable properties as per your requirements.
Managing payments for our services.	Payment information.	To take payment for rents or deposits as required.
Communicating with you.	Contact Information.	Communicate appointments, and documents; such as forms and agreements, and negotiate terms with yourself.
Supplying you with information by email and/or post that you have opted-in-to (you may opt-out at any time by sending us an email.	Contact Information. Profile Information.	To enable us to: Send you details on properties of interest. Source most suitable properties as per your requirements.
Passing on your Information to relevant 3 rd Parties, lettings platforms and agencies such as Goodlord and Homelet	Identity Information Contact information Employment or Business information Payment information	To enable us to Manage and conduct referencing, affordability and suitability assessments. Manage the set up of legal documents, contracts, and Tenancy Agreements in relation to a property which you would be renting.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message, and post with information, news, and offers on available properties and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive)

Regulations 2003, and you will always have the opportunity to opt-out.

We use the following automated systems for carrying out certain kinds of decision-making and/or profiling. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact us to find out more using the details in Part 11.

- The following automated decision-making method(s) and profiling may be used:

- We use referencing companies such as Goodlord and Homelet who use Open Banking. Open Banking is a secure way to give a company access to your financial information. It was set up by the Competition and Markets Authority on behalf of the UK Government.

Every company that uses Open Banking to offer products and services must be regulated by the FCA or European equivalent.

Under the Second Payment Services Directive (PSD2), banks are required to make their payments infrastructure and customer data open to third party providers, which will give referencing providers near-instant access to more detailed information on tenants' financial position

Open banking allows referencing providers build a more accurate profile of an applicant's financial position through access a wider set of data. Applicants can share more detailed information about their finances with a referencing provider by simply logging into their online banking. This includes the amount of money that's actually coming into an applicant's account each month, which means referencing providers don't need to rely on just a letter from an employer or three months' worth of bank statements. Plus, they'll be able to see whether or not an applicant has historically paid their rent on time.

Whichever provider is instructed should obtain permission from yourself prior to carrying out any Open Banking searches and you would have the choice to either opting in or out of this.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

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 for

the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long [We] OR [I] Keep It
Identity Information including Passport, Driving Licence, other official photo ID, Utility Bills, Statements or other official proof of address ID.	During your occupancy of a property introduced to you by us and 6 years after you have vacated said property.
Contact information including Current Address, Telephone Number, Email Address.	During your occupancy of a property introduced to you by us and 6 years after you have vacated said property.
Employment or Business information including your salary, wages or profit, proof of income via wage slips or official tax returns	During your occupancy of a property introduced to you by us and 6 years after you have vacated said property.
Payment information including Bank Account details, Credit or Debit Card numbers, and adverse credit history such as County Court Judgements or defaults in making payments.	During your occupancy of a property introduced to you by us and 6 years after you have vacated said property.
Profile information including requirements for the type of property, size, location, your budget.	During your occupancy of a property introduced to you by us and 6 years after you have vacated said property.
Data from third parties including income and affordability assessment.	During your occupancy of a property introduced to you by us and 6 years after you have vacated said property.

8. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation. Your data is collected and held on an Estate Agent Software called PC Homes which has been developed and maintained by Estates I.T who have access to all the information noted on this software. Their details are:

Estates IT™ Limited
 8 Mulberry Place
 Pinnell Road
 London
 SE9 6AR

9. Do You Share My Personal Data?

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 Policy.

In some 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 obligations, a court order, or the instructions of a government authority.

We may share your personal data with the property owners of the property you are going to occupy for their records and consideration.

We may sometimes contract with the following third parties to supply products or services.

Recipient	Activity Carried Out	Sector	Location
<p>Oh Goodlord Limited. They are an Appointed Representative of Goodlord Protect Limited for general insurance products and credit broking. Goodlord Protect Limited is directly authorised by the Financial Conduct Authority, registration number 836727.</p>	<p>Lettings platform that manages tenancy process. This includes:</p> <ul style="list-style-type: none"> • Referencing, • Financial profiling, • Sending forms, agreements, and letters, • Collecting rent and deposits, • Setting up utility services. • Providing Insurance Products. 	<p>Insurance products and credit broking. Referencing.</p>	<p>Huguenot Place Heneage Street London E1 5LN</p>
<p>HomeLet. They are a supplier of Landlord Insurance, Tenant Referencing and Tenant Insurance. HomeLet is a trading name of Barbon Insurance Group Limited which is authorised and regulated by the Financial Conduct Authority for insurance mediation. Registered in England number 3135797</p>	<p>Lettings platform that manages</p> <ul style="list-style-type: none"> • Referencing, • Financial profiling, • Providing Insurance Products. 	<p>Insurance products and credit broking. Referencing.</p>	<p>Hestia House Unit 2 Edgewest Road Lincoln LN6 7EL</p>
<p>Various Contractors or Engineers</p>	<p>This would be to carry out reactive maintenance, repair, refurbishment or certification of Properties and relevant supply. Your contact details would be supplied as and</p>	<p>Building, Property Maintenance, Home renovations</p>	<p>Various contractors</p>

	when deemed necessary when an engineer or contractor is required to be instructed.		
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If any of your personal data is shared with 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, as described above in Part 8.

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 Policy.

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 obligations, a court order, or the instructions of a government authority.

We may share your personal data with the property owners of the property you are going to occupy for their records and consideration.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. 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 (for the attention of Branch Manager):

Email address: info@ashtonreeves.co.uk.

Telephone number: 01322 559955.

Postal Address: 67 Bexley High Street, Bexley, Kent, DA5 1AA.

12. Changes to this Privacy Notice

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 made available on our website: www.ashtonreeves.co.uk. This Privacy Notice was last updated on 20th May 2021.