



PRIVACY NOTICE POLICY

1. WHO IS WHYBROW?

Whybrow is a Private Limited Company with an incorporation name of Whybrow & Dodds Limited, trading as Whybrow (company number 2155295). Whybrow is affiliated by the Royal Institute of Chartered Surveyors and have been active members with fellows for over 30 years. Throughout this Notice "we" "our" and "us" means Whybrow.

Our contact details are as follows:

Whybrow

2 De Grey Square, De Grey Road, Colchester, Essex CO4 5YQ

www.whybrow.net

Info@whybrow.net

01206 577667

Our Data Protection Officer (DPO) or Controller is Ewan Dodds BSc FRICS.

2. INTRODUCTION

The purpose of this notice is to inform you of how we will use any data, including your personal data, we collect and how we manage this data.

3. WHAT INFORMATION DO WE COLLECT?

We will only ever collect data or information from you that is relevant to any case we are working on at the time. Typically, due to the nature of our services, we may collect the following data from you as standard when dealing with our Company:

- personal contact details
- work contact details
- business and property activities
- any other information required to assist us in carrying out our service(s) you instruct us to do.

We collate and store data for:

- applicants who are interested in our products (namely commercial properties) on the open market
- qualifying purposes to ensure we are sending applicants relative products
- ensuring no conflict of interest is present across our departments
- for Money Laundering Purposes.

4. WHAT DO WE DO WITH YOUR DATA?

Any data we collect is stored on a protected CRM system as well as hard copies for archiving purposes. We are required by law to hold these hard files in locked cabinets which we do. We will mainly use your data to enable us to carry out our services and

01206 577667 | info@whybrow.net | whybrow.net | [@whybrowproperty](https://www.instagram.com/whybrowproperty)

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Whybrow & Dodds Ltd, Registered in England No 2155295





advice which is necessary for the performance of our Contract with you. Additionally to using your data for the purpose of our instruction, we may also use your data for:

- accounting purposes (the administration of processing any accounting or payment matters)
- marketing our services to you
- if registered as an applicant, our relative available property products
- credit reference checks (where required and authorised on our Terms & Conditions and/or Contract with you)
- internal research across departments.

We ensure that access to our data is restricted and on a secure network with secure archives. All hard copy documentation is locked internally and electronic data is on a secure network. We do use both methods of data storing, dependent on each department the main method does vary although all departments at Whybrow hold your data in both of these secure methods.

5. HOW LONG DO WE HOLD YOUR DATA?

For any standard case where we have been commissioned by you and provided you with a service, we hold hard files for 6 years in a secure internal archiving system. Upon the 6th year anniversary, we securely waste the hard file.

On occasions, files are reopened and old data is required for us to have historical data in order to provide you with accurate advice or a service. Therefore, some data is held for more than 6 years if it has been worked on again within this timeframe.

Where we manage your property or portfolio, some clients we have done this for circa 30 years plus, we hold as much data as possible to ensure that you, if required, have as much data as possible. However, we are under no obligation to hold your data for more than 6 years although we do attempt to hold it for as long as it is viable or current.

It is necessary for us to hold your data, including tenants (where applicable) for us to carry out our main services.

6. DO I HAVE RIGHTS?

Under the General Data Protection Regulation (GDPR) rights, you have a range of rights including your 'Right to Access' to see any data we hold on your case or personal data. If you have any queries on your rights or require more information about your stored data with us, please contact our Data Protection Officer (DPO) named above. Any contact with our DPO will be required in writing together with your proof of identity even if we have this on file historically.

7. WILL WHYBROW SHARE MY DATA?

There are very strict rules around sharing any data at all we may hold for you, either personal data or any data relating to a case or service we are working (or have worked) on for you.



Sometimes, we do require to clarify with external parties if there is any conflict of interest when we work for you, which is a requirement of the Royal Institute of Chartered Surveyors (RICS) which we are affiliated by. This is normally only a name or Company name to ensure that we are morally acting for you to continue our good practice under RICS Guidelines.

The only times we may require third party assistance and any data is shared about you, we will obtain prior approval from you to do so. The main third parties we refer to here may be :

- solicitors
- architects and planners
- agents and/or surveyors in services we do not provide (eg quantity surveying).

We would only do this if it was required in order to assist or complete in providing our service to you.

Where you request or authorise, we may also discuss your case with family, representatives or other professionals acting for you.

For accounting purposes (such as rent collection, service charge collection or our Company fees), we may pass your personal details onto a bailiff company to collect any debts or moneys owed. This includes all tenants on our managed portfolios on behalf of our clients. For these, we do not require your approval to do so.

8. I GET IT, BUT I AM NOT HAPPY. WHO DO I COMPLAIN TO?

We strive to ensure that all of our services are provided and carried out online with our requirements of RICS, as well as our internal expectations. If for any reason you are unhappy about the way we are using your data, please raise any concerns you have in writing to the person dealing with your case as they will know your case best. If you are still unhappy after doing this and require further assistance to resolve any issues or concerns, please request our Complaint Procedure and follow the instructions. If you still remain unhappy, please contact our Data Protection Office named above who will look into this matter for you as soon as possible.