# **Privacy Policy**

Salcedo Property Group Limited ("SPG") is committed to protecting and respecting your personal data. This privacy notice informs you about your privacy rights under the General Data Protection Regulation (GDPR). SPG is registered under the Data Protection Act 1998. Information Commissioner's Office registration number: ZA166698

Salcedo & Company are owned and operated by Salcedo Property Group Ltd.

By providing information direct to Salcedo & Company and/or visiting <a href="www.ssalcedo.co.uk">www.ssalcedo.co.uk</a> (and all pages linked within its sitemap) (the SPG Site) and/or social media platforms that SPG create, you are accepting and consenting to the practices described in this policy.

We may change this policy from time to time by updating this page; you should check this page from time to time to ensure that you are happy with any changes. This privacy notice was amended 05/05/2022 and it supersedes any earlier version.

### **Information We May Collect From You**

In order to provide you the best possible service, whether you are purchasing, renting, selling or letting a property through us; purchasing, renting, selling or letting a property from one of our clients or; a leaseholder or sub-tenant living in a property managed by SPG, we collect and use your personal data in order for us to provide you with our services accordingly.

We may collect and process the following data:

**Identity Data** includes full name, marital status, title, date of birth, gender, nationality, photographic identification, and feedback survey responses.

**Contact Data** includes all billing addresses, E-mail addresses and telephone numbers.

Financial Data includes bank account and payment details.

**Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

**Technical Data** includes internet protocol (IP) address, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

Salcedo & Company may receive information about you if you use any of the other websites SPG operate or are involved with or the other services we provide. We are also working closely with third parties (including, for example, your financial advisors, business partners, subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

# Why We Collect It

The provision of the above information is required to enable us to perform a contract you have with us and / or our client and pursuant to which we are appointed as their / your agent; this may include, but is not limited to, the following:-

To contact you; To verify your identity; To register you as a new customer; To provide services to you, including customer services; To manage payments for services; To notify you about changes to our services; To provide customer support; To manage our relationship with you, which will include i) notifying you about changes to our terms and privacy policy and ii) asking you to leave a review or take a survey.

To make suggestions and recommendations to you about goods or services that may be of interest to you.

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.

#### Who We Share It With

From time to time, we may be required to share your personal data with the following categories of recipients for specific purposes: -

Service Providers acting as processors who provide IT and system administration services, anti-money laundering service providers, tenancy deposit administrators and services to enable us to perform our contract with you.

Professional Advisers acting as processors or joint controllers including lawyers, bankers, auditors, insurers, insurance brokers who provide consultancy, banking, legal, accounting and insurance services.

HMRC acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

Other Service Providers acting as processors or joint controllers including maintenance contractors, utility providers and energy brokers and parking enforcement.

This data sharing enables us to perform our contract and / or terms and conditions as agent however, we will not share your personal data with any other third party; we will however share personal information with law enforcement or other authorities if required to do so by applicable law.

We may disclose your personal Information to third parties:

In the event that we sell or buy any business or assets, in which case we may disclose your Information to the prospective seller or buyer of such business or assets subject to being in receipt of suitable confidentiality undertakings from the prospective seller or buyer.

If we are under a duty to disclose or share your Information and personal data to comply with any legal obligation, or to enforce or apply our terms and conditions of use and other agreements, or to protect the rights, property, or safety of SPG, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

# Where Your Personal Data May Be Held

Your personal data may be held at our offices, and third party agencies, service providers, representatives and agents as described above.

We have robust security measures in place to seek to ensure that there is appropriate security for information we hold, including those measures detailed in our GDPR data protection policy.

Once we have received your personal data we will use reasonable and necessary procedures and security features to prevent unauthorised access and your personal data from being accidentally lost, or used or accessed in an unauthorised way (e.g. we limit who can access your personal data to those individuals and third parties who need to know it and who are subject to a duty of confidentiality).

# **How Long Your Personal Information Will Be Kept**

We retain your personal data whilst you use our services (or whilst we provide services connected to you) and for at least seven years thereafter, for legal, regulatory and accounting purposes.

If we need to retain your personal data for longer, we take into consideration the potential risks in continuing to store your data against why we might need to keep it.

### Cookies

The SPG Site uses cookies to distinguish you from other users of the SPG Site. This helps us to provide you with a good experience when you browse our website and also allows us to improve the SPG Site. For detailed information on the cookies we use and the purposes for which we use them see the "Cookie" section of our Terms and Conditions of Use.

# **Your Rights**

Under the GDPR you have a number of important rights which are free of charge; in summary, those include rights to:

Fair processing of information and transparency over how we use your use personal data.

Access to your personal data and to certain other supplementary information that this privacy notice is already designed to address.

Require us to correct any mistakes in your information which we hold.

Require the erasure of personal data concerning you in certain situations.

Receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.

Object, at any time, to processing of personal data concerning you for direct marketing.

Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.

Object in certain other situations to our continued processing of your personal data.

Otherwise restrict our processing of your personal data in certain circumstances.

Claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on the rights of individuals under the GDPR.

The SPG Site may, from time to time, contain links to third parties and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites are not owned or controlled by SPG and have their own privacy policies and that SPG do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **Access to Information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act.

### Contact

Questions, comments and requests regarding your personal data, should be addressed to our Data Protection Officer at <a href="mailto:info@ssalcedo.co.uk">info@ssalcedo.co.uk</a> or to the following address:

Salcedo Property Group Ltd, 2 Eastbourne Terrace, London W2 6LG

Provide us with enough information to identify you (NB. your full name, E-mail address and property address will suffice). Provide us with proof of your identity and address (NB. a copy of your driving licence or passport *and* a recent utility or credit card bill will suffice).

Confirm the information to which you request release, including any account or reference numbers which you may have been given.