

## Protecting Your Data is Important to Us

#### Introduction

We collect and use personal information so that we can provide you with estate agency and our related services.

We are National Home Move Limited, an independently owned franchise business operating under licence from Reeds Rains Limited (Reeds Rains). This privacy notice relates to your personal data we use as a data controller. Reeds Rains are also a data controller and you can view their privacy notice at <a href="https://www.reedsrains.co.uk/help/privacy-notice">https://www.reedsrains.co.uk/help/privacy-notice</a>.

PRIMIS Mortgage Network, which is a trading name of First Complete Limited will also be a controller where we as an Introducer or Reeds Rains as an Appointed Representative of them, collect your personal information. You can also find our more on how your information is used at <a href="https://www.primis.co.uk/privacy-policy-and-tcs">www.primis.co.uk/privacy-policy-and-tcs</a>.

We keep this Privacy Notice under regular review and it was last updated on 1<sup>st</sup> April 2024. Please contact us using the details below should you require any clarification regarding how we may have processed your data prior to this date.

Please read the following carefully to understand the following information regarding your personal data and how we will treat it:

- What information is being collected from you?
- When will Special Data and Criminal Disclosures be collected?
- How do we use the information we collect?
- The legal basis upon which we deal with your information
- What is the source of the information we collect?
- How long do we retain your information?
- Who do we disclosure your information to
- What marketing activity do we undertake?
- How do we keep your information secure?
- How do we use Cookies?
- What are your rights
- How do you contact us about your data



## What information is being collected from you?

Category	Examples	When we collect
Personal contact information	Name Address Email Phone numbers	Where you engage us to provide estate agency services on your behalf either in branch, at your property, by telephone or by email When you register an account on our website or use an online form to arrange a viewing, register for property alerts, request a valuation or lettings consultation, book a mortgage appointment or submit an enquiry
Personal identifiers	Marital status Date of birth Nationality Tax status	When you enter into a residential sales or lettings agreement with us
Property information	Address Property description Floor plans Energy performance certificate ratings Property photographs	When you ask us to market a property to sell or let on your behalf
Financial information	Bank account details Tax URN number	Where we manage a financial transaction for you, set up a standing order, or take payment for the services which we provide to you
Seller verification details	Current mortgage arrangements Length of ownership of property Details of source of money invested	When you ask us to sell your property
Buyer source of funds	Bank statement Agreement in principal from mortgage provider	To evidence source of funds when you make an offer to buy a property through us
Identity verification details	Date of birth Nationality Identity documentation Outcome of any checks	Where we are required by law to carry out:  - know your client anti-money laundering checks; or  - checks to verify that you have the right to rent a property
Landlord property details	Proof of ownership Mortgage, insurance and licencing details	When you ask us to provide letting services for your property



	Details of service	
	contracts	
Tenant	Marital status	When you make an application to rent a property
application	Employment details	with ourselves and we carry our referencing and
details	Nationality and	credit checks as part of this
	residential status	
	Bank details and credit	
	history	
	Outcome of checks	
Tenancy	Move in and out date	As part of any tenancy between a landlord and a
details	Meter readings	tenant
	Details of deposit paid	
	Photographs of property	
	for inventory or	
	inspection	
Browser data	The time, date and	When you visit our website or open a presentation
	duration of your visit to	we have sent to you as part of your valuation journey
	our website	
	the sites from which you	
	have come (the referral	
	URL)	
	the pages visited	
	your IP address.	
Call	A recording of your	When you speak to colleagues in a department
recordings	conversation	where calls are recorded
	Your phone number	
Special	Health information	When you volunteer this information to us
Category	Appropriate adjustments	
Information		

## When will Special Data and Criminal Disclosures be collected?

We may have collected personal information from you which is of a more sensitive nature.

Where we have done so we treat this information in accordance with the additional protection it is given under data protection laws.

## How do we use the information we collect?

Your information will be used by us in connection with the following purposes:

Data	Usage		
Estate agency services	•	Helping you to sell your property, or to find a property to purchase	
	•	Valuing your property	
	•	Providing conveyancing services (Homefast Limited.)	



	1	
	•	Referring you to our mortgage and insurance partners (Embrace
		Financial Services Limited, Mortgages First Limited and
		First2Protect Limited)
	•	Progressing any mortgage and/or insurance transaction you may
		have commenced using our services
	•	Referring you to e.surv Limited if you would like a home survey or
		property valuation report
Lettings services	•	Helping you let your property, or to find a property to rent
	•	To carry out tenant referencing and credit checks to assess if you
		are creditworthy before you move in to a property
	•	To protect a tenant's deposit by registering it with a deposit
		protection scheme
	•	To process the receipt and payment of rent, maintenance and tax
		To arrange an energy performance certificate or home report
		inspection for you
		•
		To arrange an inventory or to prepare a report on the condition of a property
	•	To ensure that utilities are in place and that utility companies and
		local authorities are able to contact you for billing purposes when
		you move in to a property
	•	To arrange and carry out essential maintenance and emergency
		repairs to a property via an approved contractor
	•	To manage ongoing renewals of tenancies
Marketing our services to	•	To provide you with general updates in relation to the property
you		market
, , ,	•	To provide you with information or services believed to be relevant
		to you, including conveyancing and financial services products
		To carry out targeted advertising to you on social media websites
		when you have already shown an interest in our services
Responding to your	•	To help answer any questions which you have asked one of our
queries		agents or staff members
	•	To provide you with a quote for our services
Improving our services	•	To analyse cookie and website usage data to improve our website;
	•	To allow us to customise the content which is presented to you
		based on your likely interests
	•	To keep client records up to date
Legal and Regulatory	•	To comply with applicable laws where we are obliged to retain
Obligations		and/or disclose certain information
	•	To investigate or address claims or complaints relating to your use
		of our services
	•	For internal and external auditing purposes
	•	To carry out anti-money laundering checks
	•	To carry out right to rent checks
Other	•	To take a payment for the services we provide
	•	to collect a debt which is owed to us
		to delicate dest milet to droug to do



•	for onward referencing where you are a tenant							
•	Retention	of	copyright	in	all	advertising	material	(including
	photograp	hs)						

## The legal basis upon which we deal with your information

Wherever we collect or use your personal information, we will make sure we do this for a valid legal reason. This will be for at least one of the following purposes:

- because it is necessary to fulfil the terms of our contract with you if you have entered into a contract with us for example to sell a property
- because it is necessary to support the legitimate interests of our business in providing estate agency services in relation to Our Estate Agents efficiently to meet your needs- in all such cases, we will look after your information at all times in a way that is proportionate and respects your privacy rights and you have a right to object to processing as explained in the section on Your Rights below;
- to meet responsibilities, we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities
- where we have obtained a clear consent from you we will always make it clear when we need your consent and how you can change your permissions at any time thereafter.

### What is the source of the information we collect?

The majority of the personal information which we collect will have been voluntarily provided by you, however we may also obtain your personal data from other sources including:

- LSL Group companies;
- other Reeds Rains franchisees;
- third parties including credit reference agencies, law enforcement/regulatory bodies, companies providing commercially available databases, social networks (such as Facebook),
  - introducer companies who have referred you to us for the delivery of services, your employer, your solicitor, trustees or your attorney;
- online property portals such as Rightmove and Zoopla;
- other publicly available sources such as the electoral roll and HM Land Registry;
- your partner, spouse, family member or friend if dealing on your behalf.

## How long do we retain your information?

The personal information that you provide will be retained by us in accordance with applicable laws and our internal Retention Policy. However, we will take reasonable steps to destroy or de-identify personal information we hold if it is no longer needed for the purposes set out above. We will only hold your personal information on our systems for



as long as is necessary for the relevant purpose for which it was collected. A copy of our Retention Policy is available on request.

## Who do we disclose your information to?

The information you provide to us will be recorded and stored on our computer systems and accessed by our staff. We will share your personal data with Reeds Rains and other companies within the LSL Group for the purpose of providing a service to you and understanding your use of our products and services. Your personal information will also be made available to other Reeds Rains franchisees when you request this.

We will also disclose your information to the following third parties when required for the following purposes:

Who	Why
Vendors and buyers	To facilitate viewings and notify of any offers to buy or let their
	property
	To update and progress the sale or purchase of your property
Landlord, tenant and	To comply with our legal obligations
guarantor	To keep all parties fully informed where we manage a property on
	behalf of a landlord
	To allow you to contact each other directly in circumstances where
	the landlord is managing the property
Professional	To produce marketing packs for the sale or let of your home
photographers	
General Insurance	To allow First2Protect Limited the opportunity to offer you a
Services (administered by	quotation for home or rent protection insurance when you have had
First2Protect Limited)	an offer accepted to buy or rent a property, or when you agree to
	let your property.
Mortgage and Protection	When you agree for us to refer you to discuss your mortgage and
Services (Embrace	protection requirements
Financial Services and	
Mortgages First)	
Conveyancers	If you ask us to arrange conveyancing services for you
	To update and progress the sale or purchase of your property
Surveyors	If you or your mortgage provider require a homebuyers or structural
	survey to be carried out
LSL Land & New Homes	When you agree to buy a new home introduced by Land & New
	Homes. You can find out more how your information will be used
	at <u>www.lsllandandnewhomes.co.uk/privacy-notice</u>
Law enforcement bodies	In order to comply with any legal obligation or court order including
and/or other regulatory entities	the police, HMRC and local authorities
Auction houses	Where the property you are buying or selling is being sold by
	auction



Who	Why
Anti-money laundering	To help us perform our anti-money laundering checks
check providers	
Debt collection agencies	To assist us in collecting any monies which you owe to us where
	payment is overdue
Digital marketing	To support us in performing marketing campaigns
solutions	
Property Portals such as	To help us promote the sale or let of your property
Rightmove or Zoopla	
Estate agency and	To provide you with a better service when performing our agency
property management	activities. These include:
technology providers	Web chat
	Estate agency platform solutions
	Lead generation software
	Maintenance management
	Application management solutions
Website hosting	To manage website hosting and provision of online accounts
companies	
eSignature services	To facilitate electronic signature of documents
Professional advisers	For the purpose of assisting us to better manage, support or
	develop our business and comply with our legal and regulatory
	obligations
Third party payment	To facilitate any payments we collect from you in a secure manner
processors	
Third parties	In the event of a claim or dispute relating to the use of our services
Utility switch partner	Where the landlord of a property instructs us to arrange the supply
	of a property's gas and/or electricity
	For the purposes of notifying council tax, water and energy
	suppliers at the property and for the purposes of setting up
Deposit protection	accounts with them when you start a tenancy  For the purpose of providing a tenancy deposit protection scheme
service	Tor the purpose of providing a teriality deposit protection scheme
Zero deposit scheme	Where you have declared an interest in using a zero deposit
partner	guarantee scheme
Local authorities	To notify exemption from council tax where you are a student living
	in a property occupied only by full time university or college
	students
The Property	Where they are providing an alternative dispute resolution service
Ombudsman	in connection with the letting services which we are providing
Propertymark	A professional body responsible for raising professional standards
	amongst letting agents, where information relating to you is
	requested by them in order to protect your interests
Professional	To produce marketing packs for the sale or let of your home
photographers	



Who	Why
Approved contractors	To install for sale or let boards and to arrange gas or electric safety
	checks to your home
	To arrange and carry out essential maintenance and emergency
	repairs to your property
	To carry out inventory checks and report on the condition of your
	property
	To arrange gas or electric safety checks to your home

## What marketing activity do we undertake?

We use the information you provide us with to keep you informed about products or services which we provide and which we believe you may be interested in. Where we conduct marketing, we do so in accordance with applicable laws.

Where you contact us through the 'contact' page of our website, or make an enquiry in branch or on the phone to us, we and Our Estate Agents will use the details you have supplied to us to provide you with our general property marketing by email unless you choose to 'opt-out' of these communications.

If you do 'opt-out' then we will not send you information relating to our general property marketing by email. We and Reeds Rains may however contact you in future by phone where we reasonably believe (on the basis of services that we are providing to you) that there are additional, different services which you may be interested in. This may be, for example to offer you mortgage and protection services when we are assisting you with your search for a property, or to offer you property insurance services at the point at which you have exchanged contracts for the purchase of a house or agreed a tenancy, or to offer you conveyancing services. We and Reeds Rains rely on legitimate interests as a lawful basis for processing your information to conduct this above marketing and we and Reeds Rains ensure you always have the right to opt-out of receiving marketing communications from us. If you wish to never receive any form of marketing communication from us you can let us know by contacting us (using the details provided below).

If, at any time, you prefer not to receive further communications from us or Reeds Rains (except in connection with information, products or services that you specifically request), you will have the ability to unsubscribe from such communications by means of a link provided in every marketing message that is sent to you by us or by contacting us.



We will receive anonymous statistical information about our marketing. You will not be identifiable from this.

If you buy or rent a property, or agree to let your property through us, we will share your personal information with our insurance partners First2Protect Limited so they can provide you with a quotation. We use legitimate interests as our basis for sharing your data. If you would prefer us not to share this information, you can do so by contacting your branch or via the contact details below. You can find out more on how your information is used at <a href="https://www.first2protect.co.uk/privacy-notice">https://www.first2protect.co.uk/privacy-notice</a>.

## How do we keep your information secure?

We employ security measures which aim to protect the information provided by you from access by unauthorised persons and against unlawful processing, accidental loss, destruction or damage.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is sent to us.

Third parties service providers who process your personal data on our behalf may be located in the UK or elsewhere in the world where different privacy laws may apply which may not offer the same level of protection as UK law. We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect any information held in that country and that the service provider acts at all times in compliance with applicable privacy laws.

#### How do we use Cookies?

Our website uses cookies (including cookies to obtain an overall view of visitor habits and visitor volumes). To view more information on what cookies we use and how we use them please review our separate Cookies Policy which can be found at reedsrains.co.uk

## What are your rights?

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information. These are:



#### Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of; (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred.

#### Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in the following limited circumstances:

- where it is no longer needed for the purposes for which it was collected; or
- where you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see right to object); or
- where it has been processed unlawfully; or
- to comply with a legal obligation to which we are subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

#### Right to restrict the processing of your personal information

You can ask us to restrict the processing of your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but you still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

#### Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:



- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

### Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

## Right to object to how we use your personal information for direct marketing purposes

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

# Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

#### Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your local supervisory authority (the contact details for which are set out in the Complaints section of this Privacy Notice) if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

If you wish to access any of these rights, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal information to you.

You can exercise your rights by contacting us using the details in the Contact section of this Privacy Notice. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.



#### How to contact us

If you have questions or comments about our Privacy Notice or if you wish to exercise your rights mentioned above, please contact us by:

Email: help@nationalhomemove.co.uk;

Post: National Home Move, 65-66 Baxter Gate, Loughborough, LE11 1TH; or

Telephone: 01509 231731

If you have any concerns or complaints as to how we have handled your personal data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at https://ico.org.uk/global/contact-us/ or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

#### How to contact Reeds Rains

If your query relates to use of your personal information by our franchisor, you may contact them via:

Email: dataprotection@lslps.co.uk;

Post: Data Protection Officer, Newcastle House, Albany Court, Newcastle Business

Park, NE4 7YB; or

Telephone: 0191 233 4600



