



Company Number: 9457911

PRIVACY NOTICE – GDPR COMPLIANT – MAY 2018

Please read the following information carefully. This privacy notice contains information about what data we collect and store about you and why. It also tells you who we share this information with, the security mechanisms we put in place to protect your data and how to contact us if you have a complaint. We will not share your personal information with any other third parties without your consent, other than as confirmed in this privacy policy/notice.

WHO WE ARE:

DATA CONTROLLER:

The Step Property Sales and Lettings LTD, 198 Elliott Street, Tyldesley Manchester M29 8DS (a company registered in England and Wales with registration number 9457911).

Email: info@the-step.co.uk Tel: 01942 895940

The Step Property Sales and Lettings LTD (The Step) collects, uses and is responsible for personal information about you. When we do this we are the 'controller' of this information for the purposes of the General Data Protection Regulation and other applicable data protection laws.

OUR DATA PROTECTION OFFICER IS:

Janeve Sleeman – Email – info@the-step.co.uk Tel: 01942 895940

WHAT WE DO WITH YOUR INFORMATION, COLLECTED BY US:

When carrying out business activities in relation to the valuation, sale, acquisition/purchase, letting or arranging a tenancy, of property and/or land we collect the following personal information that you will need to provide us:

- Your full legal name
- Your telephone contact numbers
- Your home address and property address (if different)
- In the case of a company your registered office address and the address we should contact you at on a daily basis (if different)
- Your email address
- Proof of identity documentation to comply with the current Money Laundering Regulations. Usually we need to take copies of your passport and photo driving licence, and we will often ask to take copies of recent bank statements and council tax/utility bills, proof of ownership
- When arranging to rent a property through us, we will often provide a landlord with details of your salary, employment information, references, any children and/or pets who intend to occupy the property.

INFORMATION COLLECTED FROM OTHER SOURCES:

In order to identify the legal owners of properties and land that we market, and properties we let, we obtain from the land registry office copy entries to verify the legal names of the legal owners. This information is already a matter of public record.



The Step Property Sales and Lettings Ltd

198 Elliott Street Tyldesley Manchester M29 8DS T: 01942 895 940 F: 01942 874797 E: info@the-step.co.uk W: the-step.co.uk

When we take instructions from a company to sell, buy, or let a property/land we will usually cross check information provided to us with what is available on the companies house database. Again, this is a matter of public record.

Property portals such as Rightmove, Zoopla, OnTheMarket, getanagent, nethouseprices send us your personal data when you have requested them to do so.

HOW WE USE YOUR PERSONAL INFORMATION:

We use your personal information for the following purposes:

When carrying out business activities in relation to the valuation, sale, acquisition, letting or arranging a tenancy for a property and/or land we collect the following personal information that you provide to us:

- Your property address when arranging a valuation/market appraisal
- Your email address to send you our Privacy Policy/Notice, Our Agency Agreement and Terms of Business (when you are selling/letting) and property details (when you are buying/renting) and general correspondence that occurs within the nature of our business.
- Your communications with us, including a record of emails and telephone correspondence created between us both.
- Where you are not the legal owner of the property we will request details from you as to your ability to sell or let the property, such as Power of Attorney, Grant of Probate or Guardianship Order.
- As a seller/Vendor when you accept an offer on your property we will pass your name and address and the property address (if different) to both your lawyer and to the buyers lawyer.
- As a buyer when you have made an offer on a property which is accepted by the seller/vendor we pass your name and contact address to both your lawyer and the sellers lawyer.
- To help ensure your transaction proceeds as smoothly as possible we also pass your name and the property address when you are buying/selling to other lawyers in the chain. We never pass them your email address or telephone numbers or copies of your proof of identity documentation.
- As a Landlord or Tenant we will disclose in full the Assured Shorthold Tenancy Agreement (AST) to both parties.
- Landlord and Tenant contact details will be passed to the Deposit Protection Scheme (DPS).
- When we do not manage a tenanted property, or are instructed on a 'Tenant Find' only basis we will pass relevant contact details between Landlord and Tenant, we will disclose Landlord's bank details to the approved Tenant(s) in order for them to transfer rent.
- If you are a tenant renting under the 'Right to Rent' scheme we will collect details of your Biometric residence card, your immigration status document and/or your birth certificate to carry out our required checks under this scheme.
- Guarantor and permitted occupiers contact details will automatically be passed to a Landlord.

WHETHER INFORMATION HAS TO BE PROVIDED BY YOU, AND WHY:

In order to comply with the current money laundering regulations, we are obliged to obtain from you and also verify, copies of your photo identification, such as a valid passport or a valid photo driving licence, together with proof of address identification, such as a recent bank statement or utility bill. We will ask to see original documents, make our own copy, which we will then certify as a true copy of the original and which we will store electronically. For security reasons we arrange to securely destroy paper copy documents that we have made. In case of a purchaser under the regulations we often require to see 'proof of funds' and if we take a copy we will store this electronically and then destroy the paper copy.

This proof of identity personal information must be provided by you to us, to enable us to comply with law, and we will inform you whether you are required to provide this information to us. When selling a property this will be at an early stage, and well before the property being launched to the market. When buying a property we must have proof of identity documentation before we can issue a Sales Memorandum.

LEGAL REASONS WE COLLECT AND USE YOUR PERSONAL INFORMATION:

We rely on 'Consent' as the legal basis for processing your information. The 'official' name for the current UK money laundering regulations is: Money Laundering, Terrorist Financing and Transfer of Funds (information on the payer) Regulations 2017.

Who will we share your personal information with:

We will also pass your details to the following organisations (our data processors) who carry out certain activities on our behalf as part of us providing our services:

- Creditsafe: As part of our Anti-Money Laundering Policy we will usually undertake electronic verification of your proof of identity documentation via creditsafe who hold a bank of data linked to Experian. Any checks made in this way do not affect your credit rating.
- Jupix (Property Software Group): Our supplier of 'Computer software and services for 'Property Sales and Rentals' which is used to manage the property data and client information that we store.
- Social Media: On occasion we will advertise properties For Sale and To Let on Social Media.

We will also disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such businesses or assets.
- If our company or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- As part of our Anti-Money Laundering Policy we will usually undertake electronic verification of your proof of identify documentation via creditsafe, who hold a bank of data linked to Experian. Any checks made in this way do not affect your credit rating. We will never provide any third parties with your proof of identity documentation.
- We will not share your personal information with any other third parties without consent, other than as confirmed in this Privacy Policy/Notice.

Sales – sellers and Buyers

Before a property is launched to the market an EPC and floorplan will be required and we will pass your contact and property details to our approved third party providers. During the course of any offer, negotiation, agreeing the sale of your property or land, it is likely that the buyer and/or their mortgage lender will need to gain access to your property to undertake a valuation and/or survey. We will provide them with the minimum of your details such as full property address and the contact telephone number for your so that they can arrange a mutually convenient appointment. Buyers – during the course of any negotiation or when a sale is agreed we will pass both seller and buyer personal details to their respective solicitors. Full chain details of your name and address will be provided to other solicitors in the chain, and sometimes to other estate agents in the chain. Your 'phone numbers. Email addresses and proof of identity documentation will never be passed to these contacts.

Lettings – Landlords and Tenants

Before a property is launched to the market an EPC and floorplan will be required and we will pass your contact and property details to our approved third party providers. We have relationships with a number of third party contractors that we will routinely share your name, address, telephone numbers and email address with. For a list of these third parties contractors please contact us. This data sharing enables us to facilitate repairs/maintenance/check-out/cleaning etc., as efficiently as possible. We will never share your proof of identity documentation with these third parties.

Tenants Referencing: this is undertaken with Creditsafe, and tenants full contact details and date of birth will be provided. We will write to current employers and Landlords to obtain information about employment including salary details and landlord information on previous rental.

Tenants: Next of Kin is stored in-house and not passed to third parties, except in case of absolute emergency.

Landlord and Tenant contact details will be passed to the Deposit Protection Scheme (DPS).

Tenant's: Information of meter readings and forwarding addresses will be passed to deal with the administration of setting up or closing of utility accounts, and council tax.

Transfer of your information outside the European Union (EU) / European Economic Area (EEA):

We are not aware of any reason where it may be necessary to transfer your personal information outside the EU/EEA or to an international organization. Should you request for such information be sent to us by a law enforcement agency we would only ever do so at the insistence of the UK's National Crime Agency.

HOW LONG WILL WE STORE YOUR PERSONAL DATA – CONSENT:

We are relying on your explicit consent to process and store your personal data in order that we can 'keep in touch' and from time-to-time provide you with the property details and general market information. You provided this consent either when you initially registered with us or by confirming your consent prior to GDPR coming into force on 25 May 2018.

You have the right to withdraw this consent at any time, but this will not affect the lawfulness of any processing activity we have carried out prior to you withdrawing your consent. You can opt-out by emailing us at: info@the-step.co.uk or by writing to: Data Protection Officer, The Step Property Sales and Lettings Ltd, 198 Elliott Street, Tyldesley Manchester M29 8DS.

We will retain your personal data for different periods of time depending on the service you have chosen to use us for, and which may be a longer period than that for which we need to hold your data to provide these services, i.e. Where we are under a regulatory or statutory duty to hold your data for a longer period or need to retain it in the event of a legal claim or complaint.

In addition to this we will also store your data as follows:

Sales: When selling a property and you are the seller/vendor, the length of time we retain your personal information:

| | | |
|---|--|--|
| 2 years after the date the relationship has ended | When we value your property and you decide not to bring it to the market | When we value your property and launch it to the market but a sale is not effected |
| 5 years after the date the relationship has ended | When we value your property and agree a sale which does not conclude | When we value your property and agree a sale which does not transact and exchange/complete |

Sales: When you are the buyer of a property we are selling, the length of time we will retain your personal information:

| | | |
|---|---|--|
| 2 years after the date the relationship has ended | When you register as an applicant/buyer with us to view properties, and you do not make an offer or you do make an offer which is not accepted | |
| 5 years after the date the relationship has ended | When you register as an applicant/buyer with us to view properties, and you make an offer which is accepted but the purchase does not exchange. | When you register as an applicant/buyer with us to view properties, and you make an offer which is accepted, and the purchase exchanges/completes. |

Lettings: When letting a property and you are the owner, the length of time we will retain your personal information:

| | | | |
|---|---|---|---|
| 2 years after the date the relationship has ended | When we assess your property for rental purposes and you decide not to bring it to the market | When we value your property and launch it to the market but a tenancy is not effected | When we value your property and agree a tenancy which does not transact |
| 5 years after the date the relationship has ended | When we value your property and agree a tenancy which does transact and the property is let | | |

Lettings: When you are the applicant/tenant of a property we are letting, the length of time we will retain

your personal information:

| | | |
|---|--|---|
| 2 years after the date the relationship has ended | When you view properties with us, and you do not make an offer to rent or you make an offer to rent which is not accepted. | |
| 5 years after the date the relationship has ended | When viewed property with us and you make an offer to rent which is accepted but the tenancy is not concluded | When viewed a property with us and you make an offer to rent which is accepted and you agree the tenancy and move in to the property. |

YOUR RIGHTS

Under the General Data Protection Regulation, you have a number of important rights that you can exercise free of charge. In Summary, these rights are:

- Transparency over how we use your personal data and fair processing of your information:
- Access to your personal information and other supplementary information:
- Require us to correct any mistakes or complete missing information we hold on you:
- Require us to erase your personal information in certain circumstances
- Receive a copy of the personal information you have provided to us or have this information be sent to a third party, this will be provided to you or the third party in a structured, commonly used and machine readable format:
- Object at any time to processing of your personal information for direct marketing
- Object in certain other situations to the continued processing of personal information:
- Restrict our processing of your personal information in certain circumstances:

If you want more information about your rights under the GDPR please see the Guidance from the Information Commissioners Office:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you want to exercise any of these rights, please:

- Email, phone or write to our Data Protection Officer (see Get In Touch' below).
- Please be prepared to provide additional information so that we can identify you, and we are very likely to contact you to request further information to verify your identity. For security reasons we must be sure it is you who are requesting the right or rights that you wish to exercise.

We will respond to you within one month from when we receive your request. Please note if you wish to unsubscribe from any email you can do so by contacting us by telephone or email. It may take up to 5 working days for this to become effective.

HOW TO MAKE A COMPLAINT:

We hope that you are happy with our service and that our Data Protection Officer can resolve any issues or complaints that arise. Please get in touch if you have any concerns.

The General Date Protection Regulations also give you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) this will be in the country/state where you work, normally live or where the alleged infringement of data protection laws occurred. The UK supervisory authority is the Information Commissioner's Office who can be contacted at

<https://ico.org.uk/concerns/>

AUTOMATED DECISION MAKING

We do not use Automated Decision Making in the course of our business.

OUR SECURITY

The security of information is very important to us and we have measures in place which are designed to prevent unauthorized access to your personal information. The include, but are not limited to:

Electronic data files are stored - being on a client management internal secure server system password locked and the second being hard copies are kept to a minimum and are stored in locked cabinets before being securely destroyed.

FUTURE PROCESSING

We do not intend to process your personal information for any reason other than stated within this privacy notice. If this changes, we will inform you by email.

CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice was published in 2018. We constantly review our internal privacy practices and this policy will be reviewed as a minimum, six-monthly and we may change this policy from time to time. When we do, we will inform you by email.

GET IN TOUCH

If you have any questions about this privacy notice or the information we hold about you, please contact our Data Protection Officer.

The best way to reach us is to email: info@the-step.co.uk alternatively, please telephone 01942 895940 and ask to speak to Janeve Sleeman.

Alternative Formats

If it would be helpful to have this notice provided in another format (for example: in another language, audio, braille) please contact us.