

## **Fraser St James Privacy Notice**

The Fraser St James privacy notice provides information on how Fraser St James and any of its subsidiaries, branches or representative offices and any 3rd party providers collect, use, secure, transfer and share your information. Fraser St James Estate Agents covers aspects in the property sector including the selling of residential and commercial property. The rental and management of residential property.

Fraser St James has its head office at:

Hyde Park House,  
Cartwright St,  
Hyde,  
SK14 4EH

<b>Property Sales</b>	<b>This division deals with the selling of residential and commercial property in the UK.</b>
<b>Property Rental</b>	<b>This division deals with the rental of property for landlords throughout the UK.</b>
<b>Property Management</b>	<b>This division deals with the management of rental properties throughout the UK.</b>

## 1. Types of Information Collected

1. First Name	21. How many Dependants	41. Personal /Secure Loan Details	61. IP Address
2. Middle Name	22. Dependants Name	42. Personal Debt Details	62. Cookies
3. Surname	23. Dependants DOB	43. Personal Expenditure	63. Marital Status
4. Previous Name	24. Primary ID *	44. Existing Mortgage Details	64. Salary
5. Date of birth	25. Address ID *	45. Existing Insurance Details	65. Accountant Details
6. Present Address	26. Bank Statements *	46. Email Address	66. Previous employers details
7. Residential Status	27. Credit Card Statements *	47. Phone Numbers	67. Employers Address
8. Previous Addresses	28. Mortgage Statements *	48. New Property Details	68. Employers Phone number
9. Landlord Details	29. Proof of Deposit	49. Solicitor Details	69. Health
10. Nationality	30. Payslips *	50. Estate Agent Details	70. Ethnicity
11. NI Number	31. Self Employed Accounts *	51. New Mortgage Details	71. Credit Card Details
12. UK National	32. Employers Name	52. New Insurance Details	72. Bank Details
13. Doctors Details	33. Gender	53. Criminal Offences /Convictions	

\*Copies

### 1.1. Methods of Collection

In the general conduct of business, Fraser St James collects information relevant to the services being sought across the range of services it offers (listed previously) from:

- Yourself
- Next of Kin
- Spouse / Partner / Family Member
- Business Associates
- Employers

- “Trusted” Sources, including:
  - Government / Land / Police registers
  - Credit / Default Agencies
  - Financial Institutes (Banks, Building Societies, Loan Agencies, Credit Card companies)
  - Insurance Companies
  - Other Law Firms
  - Health Providers
  - Through consent of Third Parties disclosing information about you to us that they have collected

Such information will generally be collected directly via the use of any of our standard forms, over the internet, via email, in our branches or through a telephone conversation with you. We may also collect personal information through our affiliates or suppliers.

In addition, you may choose to submit information directly to us via several methods, including:

- Through Fraser St James and affiliates websites
- In response to marketing or other communications
- Through social media
- By signing up to a Fraser St James product or service
- Through participation in an offer, program or promotion
- In connection with an actual or potential business or employment relationship with us

You may also agree to third parties disclosing information about you to us that those third parties have collected.

We, our service providers and partners collect certain information by using automated means, such as cookies and web beacons, when you interact with our advertisements, mobile applications, or visit our websites, pages or other digital assets. The information we collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services on our websites and mobile apps. The analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our websites and apps.

“Your Rights and Choices” section of this Privacy Notice specifies your ability, to opt out or limit the usage of the information collected.

## 1.2. Purposes of Collection

Generally, we will collect, use and hold your information for the purposes of:

- Assessing applications for and providing Fraser St James products / services.
- Conducting business, developing relationships with Fraser St James and affiliates.
- Process payments / transactions including: Accounting, Authorisation, Clearing, Charge backs, Auditing, Billing, Reconciliation, Collection, Complaints, Enquiries, Credit Checks and related dispute resolution activities.

- Protect against and prevent fraud, unauthorised transactions, money laundering (please see below), tax evasion, claims, other liabilities and manage risk exposure and agent / franchise quality, integrity, compliance and security of business processes.
- Create and manage any accounts, associated authentication criteria (ids and passwords) you may have with Fraser St James.
- Provide, administer and communicate with you about Fraser St James products, services, offers, programs and promotions, their issuers, acquirers, retailers and partners.
- Compile business directories, including business contact information.
- Operate, monitor, evaluate and improve our products, services, websites, mobile applications, other digital assets and business.
- Developing new products and services.
- Managing communications, assess effectiveness and optimisation of advertising.
- Functionality of our websites, mobile applications other digital assets.
- Evaluate your interest in employment and contact you regarding possible employment opportunities.
- Enforce Fraser St James "Terms of Use", other legal rights as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over Fraser St James or its affiliates.
- Comply with industry standards and Fraser St James policies.

## Anti-Money Laundering

In addition to help you with a property related service we have to comply with certain regulations for example the "Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to as "the Regulations)." Fraser St James and other subsidiaries are required to obtain certain information from you to comply with regulations. The information provided will only be used by Fraser St James in relation to complying with the Regulations and will not be shared with any other party outside of the companies wholly owned by Fraser St James unless we are required to do so under law.

If you decide to enter in to a business relationship with Fraser St James Estate Agents or any wholly owned subsidiary to comply with certain regulations.

We will require two separate Identification documents one primary and one secondary document even if it appears on both lists. The information may be required at various stages of the process depending whether you are:

Purchasing (or Selling)

### Primary documents - proof of ID

- Valid Passport with MRZ
- Valid full UK photo driving licence
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Valid EU/EEA/Switzerland photo driving licence
- Valid EU/EEA/Switzerland national Identity Card
- Valid UK Armed Forces ID Card
- Valid UK Biometric Residence Permit (copy of both sides.)
- Valid Blue disabled drivers pass (With photo)
- Valid Freedom Pass
- Valid Local Authority Bus pass.

- Department for Works & Pensions letter confirming pension details including National Insurance Number dated within the last 12 months.

### Secondary documents - proof of residence (home)

- Valid full UK photo driving licence.
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Local authority council tax bill (dated within the last 12 months).
- UK Bank / Building societies statements/bills showing activity, dated within the last six months. Including account number and sort code. (Internet printed acceptable.)
- UK mortgage statement (dated within the last 12 months.) (Internet printed acceptable.)
- Utility bill dated within the last 6 months including - Electricity bill (with MPAN number), Landline, Gas, Satellite TV, Water. (Internet printed acceptable.) (Not mobile phone bills.)
- Her Majesty's Revenue and Customs (HMRC) Inland Revenue (IR) Coding / assessment / statement (dated within the last 12 months) with National Insurance number.
- Department for Works & Pensions letter confirming pension details and NI Number. (Dated within the last 12 months).

We reserve the right to employ third party electronic verification for the purpose of verifying identity. This search will not affect your credit rating.

### 1.3. Lawful Basis of Processing

Fraser St James processes your information under the following

- Performance of a contract: where you enter into a contract with Fraser St James and we need to process your information as part of this contract
- Legitimate interests: some information is processed by Fraser St James as part of its legitimate interests which include: Fraud, risk assessment, due diligence, network and information security, suppressions and managing opting out of communications, profiling, direct marketing, monitoring, web analytics, cloud storage, acquisitions, updating customer details, lettings, sales, financial services and other core products and service provided by the data controller
- Public interest: some information is processed in accordance public interest such as relocations
- Consent: where we process information under consent we will seek you clear and unambiguous consent prior to processing your data

## 2. Information We Share

We do not sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- Landlords and landlord associates and sub processors

- Vetted affiliates and partners / Financial Institutions / Insurance Companies for business facilitation to provide required services, such as mortgages, insurance cover etc.
- Formally contracted service providers to perform services on our behalf:
- Hosting Datacentres, Infrastructure, Applications (Development / Support) , Cloud Services (Software as a Service – Expert Agent, Xero)
- Helpdesk.

We contractually require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements

- Councils, health and care providers
- Other Law firms
- Credit agencies, Land Registry Office, Her Majesty's Revenue and Customs (HMRC), Financial Conduct Authority (FCA) and other relevant regulatory bodies
- Additionally, we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities.
- Perspective employers requesting references via your written consent

On websites, features can be accessed where we partner with other entities that are not affiliated with Fraser St James. These include social networking, geo-location tools etc. are operated by third parties (indicated appropriately) who may use or share personal information in accordance with their own privacy policies. It is recommended that you review the third parties' privacy policies if you use the relevant features.

Fraser St James reserve the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets, with reasonable efforts for the acquirer protect

/ use your information consistent with our Global Privacy Notice. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.

## 2.1 Data Storage

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep your information for as long as necessary. We generally keep personal information for 7 years after last contact with you. However Fraser St James reserves the right to keep information for longer if we feel that this is in the legitimate interests of Fraser St James.

## 2.2 International Data Transfers

Fraser St James will not transfer your data outside the EU.

## 2.3. Profiling

For the purposes of business conduct, enhancement, identification of fraud, money laundering and other potential un-authorized activities, Fraser St James engages profiling activities via direct use or anonymisation of sensitive personal information.

### 2.3.1 Direct Profiling

Direct profiling is engaged for the fair and lawful purposes, to provide Fraser St James the ability to enforce Fraser St James "Terms of Use", legal reporting as may be required by applicable laws, regulations, policies / standards or requested by any judicial process or governmental agency having or claiming jurisdiction over Fraser St James or its affiliates; including, but not limited to:

- Benchmarking employees: appraisals, performance, bonus payments, disciplinary actions, improvement plans, promotions and awards.
- Background checks for existing and new employees, clients, business partners, affiliates
- Financial Viability analysis / reports
- Business partner / client portfolio position, performance, risk positions
- Anti-money laundering
- Tax reporting
- Credit defaulting / exposure

### 2.3.2 Indirect Profiling

Indirect profiling via anonymisation of personal information is also used for preparing and furnishing aggregated data reports showing anonymised information, including, but not limited to, the following:

- Compilations, analyses, analytical and predictive models and rules, and other aggregated reports for the purpose of advising our partners / affiliates and servicing institutions, retailers and other customers regarding past and potential future patterns of service usage, spending, fraud, and other insights that may be extracted from this data.
- Compiling and communicating promotional and marketing information about products and services that Fraser St James, affiliates and other organisations that we have affiliations with have and that may be of interest to you.
- Conducting market research
- Facilitating our internal business operations, including the fulfilment of any legal requirements.

## 2.4. Your Rights and Choices

Your rights regarding the sensitive / personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that informa-

tion, and how we communicate with you.

## **2.5. Access and Correction**

You may have the right to:

- Obtain confirmation that we hold personal information about you.
- Request access to and receive information about the personal information we maintain about you.
- Receive copies of the personal information we maintain about you.

The right to access personal information may be limited in some circumstances by local law requirements.

To exercise these rights, please contact us as set forth below.

## **2.6. Updating and Correcting Inaccuracies in your Personal Information**

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to information we hold about you:

## **2.7. Object to the processing of your personal information**

If you would like to object to any processing of your information by Fraser St James you can contact us outlining what processing of information you would like to object to.

## **2.8. Have the information blocked, anonymised or deleted**

If you would like Fraser St James to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like deleted, blocked or anonymised.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us as specified in the "How To Contact Us" section below.



## 2.9. Opting Out of Processing

You can opt out collection of personal information by automated means e.g. when visiting our website or visit third-party websites and interact with our adverts, by using the Cookie Consent tool displayed in the website (the browser you use may provide options on how to opt out of receiving certain types of cookies). However without cookies you may not be able to use all of the website features and/or online services.

Fraser St James operate a cookie policy Some of our service providers and partners may collect information about your online activities over time and across third-party websites to customise and target our adverts.

You can at any time tell us not to send you marketing communications by:

- E-mail [info@fraserstjames.co.uk](mailto:info@fraserstjames.co.uk)
- Unsubscribing via the “unsubscribe” link within the marketing e-mails you receive from us.

### Cookie Policy

We use cookies and other similar technologies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website (for example, to remember your details and improve our website). By using our website, you agree to our use of cookies.

The cookies on our website are either set by us or by third party partners and fall into the following categories:

#### *First party session management*

These are typically required by us to make sure you can move freely from one page to another and so that you can access and use certain services within the website. Normally, these cookies only last whilst your browser is open and are deleted when it is closed. Some may need to remain for the duration of your visit (a “**session**”) or longer.

Cookie name	Description	Duration
3ada1d7ebede3c4d214d085418b6fd58	Used by our website to remember website search criteria and preferences	Session

#### *Third party session management*

These cookies are used to allow interaction between our website and certain of our third party providers when you are using our website.

Cookie name	Description	Duration
remote_sid	Allows <b>YouTube</b> to store a unique user ID	Session
vuid	Allows embedded <b>Vimeo</b> videos to work	2 years

### Functionality

These cookies allow you to set and store preferences for our website, such as when you are offered the option to customise elements of the layout or content of the website.

Third party	Description
AddThis	Provides easy social media bookmarking <a href="http://www.addthis.com/privacy/opt-out">http://www.addthis.com/privacy/opt-out</a>

### Interest-based advertising

These cookies allow third parties to identify what you might find interesting, allowing a more personalised and relevant selection of advertisements to be displayed when you browse the internet. They normally won't just be from us, but build an overall, but anonymous, picture of your preferences based on how you have browsed the internet to deliver more relevant advertising. You may see interest-based advertising on our website, but also on third party websites using information collected about your browsing activity on our website.

Third party	Description
AddThis	Collects information about your visit to our website for targeted advertising <a href="http://www.addthis.com/privacy/opt-out">http://www.addthis.com/privacy/opt-out</a>
AppNexus	Collects information about your visit to our website for targeted advertising <a href="https://www.appnexus.com/en/company/platform-privacy-policy#choices">https://www.appnexus.com/en/company/platform-privacy-policy#choices</a>

Bluekai	Allows advertisers to serve advertising using cookies to our website <a href="http://www.bluekai.com/privacypolicy.php">http://www.bluekai.com/privacypolicy.php</a>
DoubleClick	Collects information about your visit to our website for targeted advertising <a href="https://www.google.com/intl/en/policies/privacy/">https://www.google.com/intl/en/policies/privacy/</a>
distillery	Collects information about your visit to our website for targeted advertising <a href="https://dstillery.com/privacy-policy/#strong-privacy">https://dstillery.com/privacy-policy/#strong-privacy</a>
global.ib- ibi.com	Collects information about your visit to our website for targeted advertising <a href="https://assets.web.com/legal/English/PrivacyPolicy.pdf">https://assets.web.com/legal/English/PrivacyPolicy.pdf</a>
Lotame	Collects information about your visit to our website for targeted advertising <a href="https://www.lotame.com/about-lotame/privacy/opt-out/">https://www.lotame.com/about-lotame/privacy/opt-out/</a>
Media Innovation Group	Collects information about your visit to our website for targeted advertising <a href="http://www.themig.com/en-us/#">http://www.themig.com/en-us/#</a>
MediaMath	Collects information about your visit to our website for targeted advertising <a href="http://www.mediamaath.com/privacy-policy/">http://www.mediamaath.com/privacy-policy/</a>
Oath	Collects information about your visit to our website for targeted advertising <a href="http://privacy.aol.com/">http://privacy.aol.com/</a>
Semasio	Collects information about your visit to our website for targeted advertising <a href="http://www.semasio.com/de/nc/en/opt-out/">http://www.semasio.com/de/nc/en/opt-out/</a>

Tapad	Collects information about your visit to our website for target advertising <a href="https://www.tapad.com/privacy-policy/#opt-out">https://www.tapad.com/privacy-policy/#opt-out</a>
The Trade Desk	Collects information about your visit to our website for targeted advertising <a href="http://insight.adsrvr.org/track/stop?action=dooptout">http://insight.adsrvr.org/track/stop?action=dooptout</a>
.w5cc.net	Collects information about your visit to our website for targeted advertising <a href="http://www.addthis.com/privacy/opt-out">http://www.addthis.com/privacy/opt-out</a>
Weborama	Collects information about your visit to our website for targeted advertising <a href="https://weborama.com/e-privacy/">https://weborama.com/e-privacy/</a>
YouTube	Serves interest-based advertising on embedded YouTube videos <a href="https://www.youtube.com/static?template=privacy_guidelines&amp;gl=GB">https://www.youtube.com/static?template=privacy_guidelines&amp;gl=GB</a>

### *Refusing or withdrawing your consent to cookies*

You may adjust your browser settings to refuse cookies, but some of the services on our website may not work if you do so. You can find our more information about cookies at [www.allabout-cookies.org](http://www.allabout-cookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu). You can disable cookies placed through AddThis by clicking here.

### **Links to Other Websites**

Our website may contain links to other websites that are not run by us. If you follow a link to another website, please note that other websites have their own privacy policies and we are not responsible for those policies or other websites' content. You should check these privacy policies before submitting any personal information to these websites.

### **Third Party Social Media Sites**

We use Facebook and Twitter as part of our marketing. Any data collected on any social media platform that we use is held solely on that platform. We do not collect data for our own database from these platforms.

## 2.10. Withdrawal of consent

If we obtain your information by consent you have the right to withdraw any consent you previously provided to us.

If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information.

Fraser St James we will apply your preferences going forward. Doing so will mean that you cannot take advantage of certain Fraser St James and affiliate products, services and promotions.

The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.

## 3. How to Contact Us / Complaints and Feedback

If you:

- Make a complaint about a breach of your personal information, applicable privacy laws/principles or a concern about Fraser St James privacy practices.
- Would like access and/or update information or preferences you provided to us,

You also may e-mail us at:

[info@fraserstjames.co.uk](mailto:info@fraserstjames.co.uk)

Or write to us at:

Carl King – Data protection Officer  
Hyde Park House  
Cartwright Street  
Hyde  
SK14 4EH

If we fall short of your expectations in processing your personal information or you wish to make a complaint about our privacy practices, please contact us via the details in the “How To Contact Us” section above.

To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time.

If we cannot for lawful reasons complete your request, we will explain this to you to the extent that we lawfully can.

### **3.1. How We Protect Personal Information**

The security of your personal information is very important and Fraser St James is committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. We use SSL encryption on a number of our websites from which we transfer certain personal information.

Fraser St James stores personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information was collected, unless otherwise required or authorised by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

### **4. Updating this Privacy Statement**

We will update this statement from time to time so we suggest that you review this statement at regular intervals. Where we undergo substantial changes to our privacy statement we will endeavour to inform you directly about these changes.

May 2018