

GDPR Notification - Privacy Notice - Customers

W G Ross & Company Limited are committed to complying with the General Data Protection Regulation and the Data Protection Act 2018, once enacted. Looking after the personal information you share with us is very important, and we want you to be confident that your personal data is kept safely and securely and to understand how we use it to offer you a better and more personalised experience.

We have published this notice to help you understand how and why W G Ross & Company Limited collect information from you, who we share your information with, why and on what basis and what your rights are.

If we make changes to this notice we will notify you by updating it on our website. W G Ross & Company Limited will be what is known as the 'Data Controller' of the personal data you provide to us, and we will sometimes refer to ourselves in this notice as "we" or "us". By Data Controller, this means W G Ross & Company Limited determines the purposes and ways in which any personal data are, or will be, processed.

Should you need to contact us please write to:

Data Protection, W G Ross & Company Limited, 16-18 Cavendish Street, Barrow in Furness, Cumbria LA14 1SB - quoting Security and Privacy Enquiry.

This privacy notice was last updated on 10th May 2018.

What information we collect when you register and why?

- When you register as an applicant searching for a property or as a vendor instructing us to sell your property, we will ask you to provide some personal information such as;
Full Name
Address (and Previous Addresses)
Contact Numbers, Email Address
- As an existing client, if you have registered with us previously as an applicant or vendor, we will securely collect and store information.
- When you apply for a credit account we get information about you from credit reference agencies. This is covered in more detail in the section 'who we share your information with and why'.

How do we use your information?

Data Protection says that we are allowed to use and share your personal data only where we have a proper reason to do so. The law says we must have one or more of these reasons and these are:

- Contract - your personal information is processed in order to fulfil a contractual arrangement e.g. selling your home.
- Consent – where you agree to us using your information in this way e.g. property matches, marketing information and correspondence to a third party.
- Legitimate Interests - this means the interests of W G Ross & Company Limited in managing our business to allow us to provide you with the best products and services in the most secure and appropriate way e.g. to transfer your data to certain third party's such as purchasers and solicitors.

- Legal Obligation – where there is statutory or other legal requirements to share the information e.g. when we have to share your information for law enforcement purposes.

Here is a list of the ways that we may use your personal information, and which of the reasons described above we rely on to do so. Where we list legitimate interests as a reason, we also describe below what we believe these legitimate interests are.

What we use your personal information for	Our reasons (legal basis)	Our explanation of legitimate interests
Manage your account/ provide customer services to you.	Legal obligation/ Legitimate interests (depending on nature of services)	Keeping our records up to date, handling our customer contact efficiently and effectively, working out which of our properties and services may interest you and telling you about them.
Set up your applicant requirements	Legitimate interest	Process efficiency in dealing with such market activity.
Notify you of new property and marketing materials	Legitimate interests	Process efficiency in dealing with such market activity, and to make improvements to our services.
Marketing communications to inform you of promotions and services. Provide you with online advertising.	Legitimate interests	Developing products, services, applications and designs that attract and retain customers. Improving customer interaction with our sites and marketing tools.
Notifying you about enhancements to our services, such as changes to the website and new services that may be of interest to you.	Legitimate interests	Developing products, services, applications and designs that attract and retain customers. Improving customer interaction with our sites and marketing tools
Contact you to undertake customer satisfaction surveys, invite you to provide reviews for market research.	Legitimate interests	Developing products, services, applications and designs that attract and retain customers. Improving customer interaction with our sites and marketing tools
Maintaining network and data security.	Legitimate interests	To maintain the security of our network. This in turns helps us to maintain the safety and confidentiality of your information.
Logistics planning, demand forecasting, management information and research	Legitimate interests	We use information in relation to the property market and property type purchased and bought together with volumes to help us to respond to demand, ensure the right properties get to the right client and to help us plan our strategies.

Who we share your information with and why

W G Ross & Company Limited works with a number of trusted suppliers, agencies and businesses in order to provide you the high-quality marketing and services you expect from us such as, credit reference agencies, fraud prevention agencies and market research companies amongst others.

Some examples of the categories of third parties with whom we share your data are:

- IT Companies
W G Ross & Company Limited works with business who support our website and other business systems.
- Marketing Companies
We work with marketing companies who help us manage our electronic communications with you or carry out surveys and product reviews on our behalf.

Payment processing

W G Ross & Company Limited works with trusted third-party payment processing providers in order to securely take and manage payments.

Credit Reference Agencies

When you apply for any rented property with us we will make searches about you with credit reference agencies. We do this to make sure customers who apply for rented property are able to

manage the level of monthly rental payments and not committing fraud by providing false or inaccurate information.

In order to process your application, we will supply your personal information to credit reference agencies (CRA's) and they will give us information about you, such as your financial history. We do this to assess your creditworthiness and product suitability, check your identity, manage your application, trace and prevent criminal activity.

We will also continue to exchange information about you with the CRAs on an ongoing basis, including about your rental payments and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will be linked to the data of your spouse, any joint applicants or other financial associates.

The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at:

Van Mildert Credit Reference Agency Information Notice

We will use automated credit-scoring methods to assess your application and to confirm your identity. We will automatically check your credit history against our lending criteria and if you don't meet our requirements you will be declined for credit. For more information see the CRA notices above. There is also an automated decision section below with further details. Should you wish to object to the use of automated credit scoring, please contact the Data Protection Officer.

Debt recovery and fraud prevention services

Before we provide services, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

Details of the personal information that will be processed include, for example; name, address, date of birth, contact details, financial information and employment details.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

We process your personal data on the basis that it is necessary in the public interest or in exercising official authority for us to prevent fraud and money laundering, and to verify identity, in order to protect ourselves and to comply with laws that apply to us.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

Automated Decisions

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision-making: if you want to know more please contact us using the details above.

Consequences of Processing

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or to employ you, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies and may result in others refusing to provide services or financing to you. If you have any questions about this please contact us on the details above.

Data Transfers

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

Your Rights

Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data, request that your personal data is erased or corrected, request access to your personal data.

For more information or to exercise your data protection rights, please contact us using the contact details above. You also have a right to complain to the Information Commissioner's Office, which regulates the processing of personal data.

Keeping in touch with you

We want to keep you up to date with information about new marketing products and property matches and improvements to our website. When you register, we will ask you if you want to receive this type of marketing information.

W G Ross & Company Limited will not share your information with companies outside of W G Ross & Company Limited for their marketing purposes.

If you decide you do not want to receive this marketing information you can request that we stop by writing to the Data Protection Officer at the address provided above.

You may continue to receive mailings for a short period while your request is dealt with.

How long we keep your information

If we collect your personal information the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.

We may need your personal information to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for 7 years after the date it is no longer needed by us for any of the purposes listed under 'How do we use your information?' above. The only exceptions to this are where:

- The law requires us to hold your personal information for a longer period, or delete it sooner
- You exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law
- We bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible
- In limited cases existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

What are your rights?

You are entitled to request the following for W G Ross & Company Limited, these are called your Data Subject Rights and there is more information on these on the Information Commissioners website www.ico.org.uk.

- Right of access –to request access to your personal information and information about how we process it
- Right to rectification –to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- Right to erasure (also known as the Right to be Forgotten) – to have your personal information erased. Contact sales@rossestateagencies.co.uk
- Right to restriction of processing – to restrict processing of your personal information
- Right to data portability - to electronically move, copy or transfer your personal information in a standard form
- Right to object - to object to processing of your personal information
- Rights with regards to automated individual decision making, including profiling –rights relating to automated decision making, including profiling

If you have any general questions about your rights or want to exercise your rights you can find more information on the ICO website www.ico.org.uk.

You have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office (ICO), the data protection regulator in the UK, are available on the ICO website (www.ico.org.uk) where your personal information has or is being used in a way that you believe does not comply, however, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

Contact

Should you need to contact us please write to:

Data Protection Officer W G Ross & Company Limited 16-18 Cavendish Street Barrow in Furness Cumbria LA14 1SB