# **GDPR/Privacy Policy Statement**

| Created By       | David Ridout, Director |
|------------------|------------------------|
| Date of Policy   | June 2019              |
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# 1. INTRODUCTION

This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

# **Questions?**

If you have any questions about how we use your personal information, please contact David Ridout on 01452 306214.

## 2. ABOUT US

Adams Fletcher Ltd will collect only the required data about you to allow us to perform our duties under our appointment with you.

### 3. WHAT INFORMATION WILL WE COLLECT

# Personal data you provide

We collect only data you provide to us. This includes information you give when making an enquiry with us or through our appointment with you. For example:

- personal details (name, email, address, telephone etc.) when you make an enquiry with us;
- financial information

# Information created by your engagement with us

Your activities and involvement with Adams Fletcher Ltd may result in personal data being created. This could include details of projects, financial information and other sensitive information relating to finance.

# Information from third parties

We may also sometimes receive personal data about you from third parties. For example, if we are partnering with another company to provide part of our services and you have previously given them information about you.

# Sensitive personal data

We do not collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation) about our clients.

# 4. HOW WE USE INFORMATION

We only ever use your personal data with your consent, or where it is necessary in order to:

- enter into, or perform, a contract with you;
- comply with a legal duty;
- protect your interests;
- for our own (or a third party's) lawful interests, provided your rights don't override these.

In any event, we'll only use your information for the purpose or purposes it was collected for:

# **Administration and project delivery**

We use personal data for administrative purposes (i.e. to carry on our duties under our appointment with you). This includes:

- maintaining databases of our clients for project administration;
- performing our obligations under our appointment with you;

### 5. DISCLOSING AND SHARING DATA

We will **never** disclose or sell your personal data.

We may share personal data with subcontractors or suppliers who provide us with services. For example, if you request that we appoint a subcontractor to carry out a particular survey, we would need to pass on your contact details including your name and contact details. Any such activities will be carried out with strict requirements on our supplier to keep your information confidential and secure.

#### 6. MARKETING

Were appropriate, we may make periodic contact with you to keep you informed of services we offer. You have the right to opt out of such correspondence at any time.

# 7. HOW WE PROTECT YOUR DATA AND WHERE WE STORE IT

All company project data (including personal data relating to clients) is stored on computers. We employ a specialist IT company to maintain our IT systems with the highest levels of security.

We use Microsoft products, including Sharepoint to store data. Access to data at any level is governed by a strict set of permissions which restrict access to only the essential members of staff for your particular project. In the unlikely event that we do need to collect personal data on paper, we would transfer it to a secure electronic format as soon as possible and securely destroy the paper copy.

## How long will we keep your personal data

We will not keep your personal data longer than is required. We are required by RICS regulations to keep project data (which would include Client details) for a period of 6 years. Furthermore, if a project used a contract signed as a deed, then we would need to keep the project data for a period of 12 years.

## 8. KEEPING YOU IN CONTROL

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or profiling; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

# Links to other sites

Our website may contain to other websites. We are not responsible for the content or functionality of any of those external websites.

If an external website requests personal information from you, the information you provide will not be covered by Adams Fletcher Ltd's Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.

### 9. CHANGES TO THIS PRIVACY POLICY

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

APPROVED BY: DAVID RIDOUT DIRECTOR DATE 01/06/2019