

Hoffen West Ltd – Privacy Policy

Our contact details

Name: Hoffen West Ltd
Address: 16 Lower Belgrave Street, London SW1W 0LN
Phone Number: 020 3858 0483
E-mail: info@hoffenwest.com

The type of personal information we collect

We currently collect and process the following information:

Personal information is any information that tells us something about you. This could include information such as name, contact details, date of birth, bank account details or any information about your needs or circumstances which would allow us to identify you.

Some personal information is classified as "special" data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious beliefs or political opinions and sexual orientation. This information is more sensitive and we need to have further justifications for collecting, storing and using this type of personal information. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data.

Any references to personal information in this privacy notice will include personal data, and where relevant, special categories of personal data.

What personal information do we collect?

We will collect your full name and contact details (such as phone number, email address and postal address) from you whenever you engage with us.

In addition, if we are providing a service to you, or on your behalf, where we are required to do so by law, we will collect information relating to your identity, which will be at least one form of photographic identification (such as a passport, a driving licence or an identification card) and one form of documentation with proof of your place of residence (such as a recent utility bill).

We will also confirm whether you have any relatives or close connections working at Hoffen West so that we can consider potential conflict of interests and if identified how to manage these, in accordance with our statutory and regulatory obligations.

Depending on the service that we provide to you (or on your behalf) we may also collect additional personal information as detailed below;

If you are buying, selling or letting a property through us;

- We will collect a contact telephone number to get in touch with you about organising viewings and updating you on any offers received or rental applications for your property.
- Where you have enquired about buying a specific property, we will use your contact details to respond which may include us sending you alternative properties to help with your search.
- 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 a Power of Attorney, Guardianship Order or Grant of Probate.
- Where you engage with Hoffen West, we may collect information required to identify you to meet anti-money laundering and counter terrorist financing requirements. If we are dealing with an entity such as a company, trust or charity, we may need to obtain personal information for the beneficiaries of the entity and those in a position of control. This will include, but is not limited to, identity and address documents. We may also need to collect information on other individuals who have an interest in the property who are not considered to be our customers.
- We will collect your bank account details to arrange onward payment of rent due to you.
- Where we are working alongside third parties such as solicitors, developers, joint or multi agents, we may need to share these documents on the basis of legitimate interests.
- If you wish to purchase a property we are listing for sale where you have specifically provided us with these, we will collect personal information relating to any specific access requirements you may have in relation to a property so that we can find a property that is suitable for your needs. We will also collect personal information required to source a property for you and, where required, negotiate the purchase of a property on your behalf.

If you wish to rent a property we are listing;

- Where you have enquired about renting a specific property, we will use your contact details to respond which may include us sending you alternative properties to help with your search
- Specific access requirements so that we can find a property that is suitable for your needs
- Your bank / building / similar account details to allow us to manage an approved tenancy deposit account for you and to set up your rental payments.
- 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

- Outside of working hours or in the event there is a matter requiring your urgent attention.
- Where you engage us for portfolio management services we will share your personal information with third party lenders as is necessary to allow us to fulfil our obligations to you and to properly manage and advise you on your property investments.
- Where you are a tenant in a building managed by Hoffen West, we may need to share your personal information with the property owner but will only do so where we have considered your own rights first.
- Where we operate CCTV in a property, we may capture your image which would constitute your personal data.

Other

If you subscribe to receive research, news or other market updates from us, then in addition to the above we will collect details about the sector in which you work and the type of content that you would like to receive.

How we get your personal information and why we collect it

What is the legal basis of our data processing?

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so. We rely on the following legal bases to use your information;

- For employment-related purposes
- Where we need information to perform the contract we have entered into with you
- Where we need to comply with a legal obligation
- Where the processing is necessary for us to carry out activities for which it is in Hoffen West's legitimate interests (or those of a third party) to do so and provided that your interests and fundamental rights do not override those interests, including:
 - Processing that is necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns – this will include sending you marketing information from time to time after you have engaged us to provide services or received services from us either which may be similar and of interest to you or where you have expressly indicated that you would like to receive such information. You have the right to opt out of receiving this information at any time.
 - Processing that is necessary to improve our knowledge of the real estate sector – this will include undertaking market analysis and research so that we better understand trends in the property sector and provide better knowledge along with more tailored and relevant services for our customers in the future.

- Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively – this will include verifying the accuracy of information that we hold about you and create a better understanding of you as a customer; processing for administrative efficiency purposes such as where we outsource certain administrative functions to third parties who are specialise in such services; processing for network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access or to comply with a request from you in connection with the exercise of any of your rights outlined below.

In more limited circumstances we may also rely on the following legal bases:

- Where we need to protect your interests (or someone else's interests); and/or
- Where it is needed in the public interest or for official purposes

We may process special categories of personal information and criminal conviction information in the following limited circumstances:

- With your explicit consent, in which case we will explain the purpose for which the information will be used at the point where we ask for your consent.

Specific information on how your personal information will be used for the particular services you have requested from us is provided below.

- We use your personal information for the purposes of fulfilling our obligations to you to let or sell your property or, if you are a buyer or tenant, for the purposes of arranging viewings, obtaining feedback, and arranging a contract for sale or a lease for you.
- We will use your personal information to conduct due diligence in accordance with other legal or regulatory obligations
- We will share your personal information with your appointed solicitors and the solicitors and agents acting for the other side of the deal as is necessary to facilitate the sale or purchase. We may also share your personal information with joint or multi agents or developers, as the case may be.
- We will share your personal data with third party referencing agencies for the purposes of the prevention and detection of crime, fraud and/or money laundering and checking your suitability to rent that property. In such circumstances, the third party referencing agency may act as a data controller for your information.

Property Management

- Where we are managing property on your behalf we may need to pass your personal information from time to time on to third party contractors whom we have engaged to carry out maintenance on your properties.

How we store your personal information

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

- Our client files are stored on our secure client management systems. Access is restricted on our client systems to those within the business who are required to have access to your information for legitimate business purposes.
- Hard copy documentation is stored in locked cabinets.

All data is hosted in datacentres which have systems and protections in place to protect against both unauthorised access, and other external factors that could cause damage to, your personal data. There are strict access requirements in place and access is restricted to those absolutely necessary.

How long do we keep your data?

The period for which we will keep your personal information will depend on the type of service you have requested from us. The retention period may be longer than the period for which we are providing services to you where we have statutory or regulatory obligations to retain personal information for a longer period, or where we may need to retain the information in case of a legal obligation.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

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Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- Your consent. You are able to remove your consent at any time. You can do this by contacting info@hoffenwest.com
- We have a legal obligation.
- We have a legitimate interest.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Data Protection Officer

16 Lower Belgrave Street, London SW1W 0LN

020 3858 0483

info@hoffenwest.com

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>