

Privacy Policy and Cookies Policy

Holbrook Estate Agents is committed to protecting and respecting your privacy pursuant to General Data Protection Regulation (GDPR) and Data Protection Act 2018. This privacy policy sets out the terms on which we process any personal data we collect from you, or that you provide to us. It explains how we collect and use your information, how you can tell us if you prefer to limit the use of that information; and the procedures that we have in place to safeguard your privacy.

Holbrook Estate Agents is registered as a data controller with the Information Commissioner's Office (ICO), which is the UK's independent body set up to uphold information rights. As a Data Controller we have a responsibility for ensuring that when we process Personal Data we comply with the law.

Our named contact is Matthew Holbrook. If you have any questions about this notice please contact us by email at matt.holbrook@thecastledenegroup.com

This policy must be read in conjunction with the terms of use of our website. It also includes details about our website cookies. If you are unsure about how cookies work, you can visit www.allaboutcookies.org.

IMPORTANT INFORMATION AND WHO WE ARE

Holbrook Estate Agents is the trading name of Holbrook Estate Agents Hartlepool Limited, a company registered at Companies House in England & Wales under company number 09399716.

We have notified the Information Commissioner's Office that we process personal data and are registered by the Information Commissioner's Office to hold personal data under ICO reference number ZA368915.

Purpose of this privacy notice

This privacy notice aims to give you information on how Holbrook Estate Agents collects and processes your personal information through your use of this website, including any data you may provide to us through this website or by post, telephone, electronic methods including email, fax, online portal or otherwise. This can be as an enquirer to our services, a client of our services, supplier of our services or a third party involved in our services.

Our website is not intended for children and we do not knowingly collect data relating to children unless authorised by a recognised parent or Guardian to do so.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice which we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and

why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

For the purposes of the General Data Protection Regulation and the Data Protection Act 2018, the data controller is Holbrook Estate Agents Hartlepool Limited t/a Holbrook Estate Agents and is responsible for your personal data (collectively referred to as Holbrook Estate Agents, "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests you may have, please contact the data privacy manager using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Holbrook Estate Agents Hartlepool Limited (CN: 09399716)

Name or title of data privacy manager: Matthew Holbrook

Email address: matt.holbrook@thecastledenegroup.com

Postal address: 2 Lighthouse View, Spectrum Business Park, Seaham, SR7 7TT

Telephone number: 0191 581 5709

Please note that you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact the data privacy manager in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 24 October 2024. Historic versions are archived and can be obtained by contacting the data privacy manager.

We reserve the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Website third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not

responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may and will from time to time proceed to collect, use, store and transfer different kinds of personal data about you, which may include the following:

- Identity Data – being your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and information to check/verify your identity eg passport, utility bill;
- Contact Data - including billing address, delivery address, email address and telephone numbers;
- Financial Data - including bank account, payment card details, salary details, benefit details, pension arrangements, NI number, tax details, share or dividend details;
- Employment Records – includes status, HR records including Special Category Personal Information;
- Transaction Data includes details about source of funds with payments to and from you and other details of the services you have instructed us to provide to you;
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, website usage data, operating system and platform, use of our IT and communication systems, secure online portals and voicemail;
- Profile data includes your username and password, your interests, preferences, feedback and survey results;
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences;
- Connected individuals – includes information provided by you about other individuals in connection with the service we are providing;
- Special Categories of Data – includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data, criminal convictions and offences.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We will usually only process with your explicit consent but also a lawful basis under Article 6 and a separate condition for processing special category data under Article 9. They do not have to be linked.

We may only use information relating to criminal convictions where the law allows us to do so.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract for the provision of services we have or are trying to enter into with. In this case, we may have to cancel the service you have instructed us to provide or our contract with you but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

Please be aware that we use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data during face to face meetings or by filling in forms or by corresponding with us by post, phone or electronic means such as email, online portals or otherwise. This includes personal data you provide to us when you:
 - apply for and engage us to provide services;
 - subscribe to our service or publications;
 - request marketing to be sent to you
 - visits to and requests through our website;
 - enter a survey or give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy at the bottom of this privacy policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties. The processing of this information may be necessary for the progression of your matter as set out below:
 - Companies House;
 - HMRC;
 - From a family member;
 - Professional advisers who refer you to us including bankers, accountants, IFA's, other estate agents.
- **Technical Data from the following sources.** Automated monitoring of our Website and other technical systems, such as computer networks, CCTV, email, voicemail, reception logs, voice and telephone recordings, document and case management systems, search information providers including sanctions screening providers and client due diligence providers.

THIRD PARTY PERSONAL INFORMATION THAT YOU PROVIDE TO US

When you provide Personal Information to us relating to a third party, you confirm that you have any necessary permission or authority to do so. When providing us with personal information about children you confirm that you have the necessary consent from a parent or Guardian to do so. You are also responsible for ensuring that the provision of third party Personal Information complies with data protection and other applicable law.

HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you in relation to the provision of services;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where it is necessary for regulatory or legal reasons;
- With your consent.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer.	(a) Identity (b) Contact	(a) performance of a contract with you for the provision of services (b) Necessary for our legitimate interests or a third party
To provide estate agency, sales or lettings services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to you and us.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests or a third party (to recover debts due to you and us)

<p>To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey.</p>	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests or a third party (to keep our records updated and to study how customers use our services)
<p>To communicate with you by electronic means.</p>	(a) Identity (b) Contact (c) Technical	Performance of contract with you
<p>To enable you to partake in a prize draw, competition, discount promotion, or complete a survey.</p>	(a) Identity (b) Contact (c) Profile (d) Usage (e)Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests or a third party (to study how customers use our services, to develop them and grow our business) (Not including electronic communications of which we will request explicit consent)
<p>To administer and protect our business and this website (including compliance of business policies, operational reasons, statistical analysis, safe working practices, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) .</p>	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests or a third party (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal and regulatory obligations
<p>Updating and maintaining client records.</p>	(a) Identity (b) Contact (c) Technical (d) Profile (e) Matter	a) Performance of a contract with you (b) Necessary for our legitimate interests or a third party (c)To comply with legal and regulatory requirements
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.</p>	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests or a third party (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy) (Not including electronic communications of which we will request explicit consent)

To prevent breaches of access and modifications to systems.	(a) Identity (b) Contact (c) Technical (d) Profile (e) Matter	(a) Necessary for our legitimate interests or a third party (b) To comply with legal and regulatory requirements
To use data analytics to improve our website, services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	(a) Necessary for our legitimate interests or a third party (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To check/verify your identity Screen for financial and other sanctions including financial crime Other processing to comply with regulatory, legal or professional obligations.	(a) Identity (b) Contact (c) Financial	(a) performance of contract (b) Necessary to comply with our legal and regulatory obligations and for our legitimate interests or those of a third party
Collating and providing information required by or relating to audits, enquiries or investigations by regulatory bodies.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Matter	(a) To comply with our legal and regulatory obligations
Respond and collate information relating to any complaint.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Matter	(a) To comply with our legal or regulatory obligations (b) Necessary for our legitimate interests or a third party
To make suggestions and recommendations to you about services that may be of interest to you.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) Necessary for our legitimate interests or a third party (to develop our products/services and grow our business) (Not including electronic communications of which we will request explicit consent)
To perform the contract with you.	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary for the performance of a contract.

Marketing and promotional offers

From time to time, we may wish to communicate with you for a purpose that is beyond what is absolutely necessary to enable us to fulfil our obligations to you under this retainer. For example, we may wish to send you a newsletter or marketing material or invite you to an event. There may be a legitimate interest in processing your information

for marketing purposes and under GDPR and DPA 2018 this means we do not need your consent to send you such updates or information.

However, as consent is needed to send electronic communications and in light of our marketing information generally being sent by email, we have a policy that we will ask you to opt in to receiving such communications. You will receive marketing opt in notification for this purpose. If you do not return that notification, we will assume that you do not wish to opt in to receive marketing communications.

You can opt out of receiving marketing communications at any time by emailing matt.holbrook@thecastledenegroup.com or by contacting the office directly.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any other organisation or third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by emailing matt.holbrook@thecastledenegroup.com or by contacting the office directly.

WHO WE SHARE YOUR INFORMATION WITH

We may have to share your personal data with the parties set out below:

- Service providers and agents who process data on our behalf eg IT/internet service and platform providers, archivers, storage facilitators, data room providers, server backup providers and those organisations we engage to help us send marketing communications to you;
- Professional advisers who we instruct on your behalf, refer you to or who are involved in our services including lawyers, bankers, accountants and IFA's;
- HM Revenue & Customs, courts, tribunals, government agencies, regulators and other authorities who require reporting of processing activities in certain circumstances;
- Our professional advisors, auditors, bank and insurers;
- A third party including your bank or other financial advisor;
- Credit reference agencies;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your

personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We reserve the right to pass any or all of your personal information to the police or any other law enforcement agency or regulatory body to comply with our legal and regulatory obligations and for the purposes of crime protection or prevention.

We use social media sites such as Facebook, LinkedIn, Instagram and Twitter. If you use these services, you should review their privacy policy for more information on how they deal with your personal information.

WHERE WE STORE YOUR PERSONAL INFORMATION

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, amongst other things, the provision of support services. Any of your personal data that is transferred outside the EEA will only be transferred to a country with an adequate ruling or where appropriate safeguards (such as the relevant company(ies) being signed up to privacy shield or having incorporated standard model contract clauses or equivalent) are in place.

All information you provide to us is stored on secure servers which may include the secure servers of our IT service suppliers (where applicable).

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about cookies please see the policy at the end of this privacy policy.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the

processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

INTERNATIONAL TRANSFERS

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Area (EEA). Where this is necessary, we will put in place appropriate protection to make sure your personal data remains adequately protected.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, reporting, or regulatory requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, any legislative or legal reasons to retain your data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

When it is no longer necessary to retain your personal data, we will delete or anonymise it. In some circumstances we may anonymise your personal data (so that it can no

longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Anti-money laundering legislation requires us to retain records, documents and information relating to you, including a copy of your identity documentation, for six years from conclusion of your contract with us or when our business relationship with you ends.

For most types of agreements with us, we retain your Personal Information, for up to six years from the date of conclusion of your contract with us, although this may vary depending on the nature of your contract with us.

In some circumstances you can ask us to delete your data: see your legal rights below:

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the following link <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> to find out more about your rights, which include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

If you wish to exercise any of the rights set out above, please contact Matthew Holbrook.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints

We hope that we can resolve any query or concern you may raise about our use of the procedure in our Complaints Policy which can be requested from us. We will investigate your complaint but if you are not satisfied with our response or believe we are processing your Personal Information unlawfully, you can complain to the UK Information Commissioner's Office. Further information is available on the ICO website or telephone 0303 123 1113.

We will keep any information in connection with the complaint or request in line with our own internal policies, meaning we will generally retain such information for a minimum of 6 years.