

## HARRISON THORN LTD - DATA PRIVACY STATEMENT

### HOW WE USE YOUR PERSONAL INFORMATION

Harrison Thorn Ltd is a registered company in the England & Wales company registered number: 9427208. This privacy notice is to let you know how Harrison Thorn look after your personal information. This includes what you tell us about yourself, what we learn by having you as a client or customer, and the choices you give us about what marketing you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you. This notice sets out your rights. Harrison Thorn Ltd is an estate agency specialising in property sales, lettings and management. You can find out more about the company at [www.harrisonthorn.co.uk](http://www.harrisonthorn.co.uk)

### THE LAW PROTECTS YOU.

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it with other legitimate parties outside Harrison Thorn Ltd. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. Here is a list of the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

WE USE YOUR PERSONAL INFORMATION	OUR REASONS AND LAWFUL BASIS	OUR LEGITIMATE BASIS
<p>To manage our relationship with you or your business.</p> <p>To develop new ways to meet our customers' needs and to grow our business.</p> <p>To develop and carry out marketing activities.</p> <p>To study how our customers, use services from us and other organisations.</p> <p>To provide advice or guidance about our services.</p>	<p>Your consent.</p> <p>Fulfilling contract.</p> <p>Our legitimate interests.</p> <p>Our legal obligation and duty.</p>	<p>Keeping our records up to date, working out which of our products and services may interest you and telling you about them. Developing products and services, and what we charge for them.</p> <p>Defining types of customers for new products or services.</p> <p>Seeking your consent when we need it to contact you.</p> <p>Being efficient about how we fulfil our legal duties.</p>

<p>To deliver our products and services.</p> <p>To make and manage customer payments.</p> <p>To manage fees, charges and interest due on customer accounts.</p> <p>To collect and recover money that is owed to us.</p>	<p>Fulfilling contract.</p> <p>Our legitimate interests.</p> <p>Our legal obligation and duty.</p> <p>Fulfilling contract.</p>	<p>Being efficient about how we fulfil our legal and contractual duties.</p> <p>Complying with regulations that apply to us.</p>
<p>To detect, investigate, report, and seek to prevent financial crime.</p> <p>To manage risk for us and our customers.</p> <p>To obey laws and regulations that apply to us.</p> <p>To respond to complaints and seek to resolve them or respond to a recognised redress scheme.</p>	<p>Our legitimate interests.</p> <p>Our legal obligation and duty.</p> <p>Fulfilling contract.</p>	<p>Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect.</p> <p>Complying with regulations that apply to us.</p> <p>Being efficient about how we fulfil our legal and contractual duties.</p> <p>Complying with regulations that apply to us.</p>
<p>To run our business in an efficient and proper way. This includes managing our communications, business capability, planning, corporate governance, and audit.</p>	<p>Our legitimate interests.</p> <p>Our legal obligation and duty.</p>	<p>Being efficient about how we fulfil our legal and contractual duties.</p>
<p>To exercise our rights set out in agreements or contracts.</p>	<p>Fulfilling contract.</p>	<p>Being efficient about how we fulfil our legal and contractual duties.</p>

We use many different kinds of personal information such as;

Type of personal information	Description
Financial	Your financial position, status and accounts.
Contacts	Where you live and how to contact you.
Socio-Demographic	This includes details about your work or profession, nationality and where you fit into general social groupings.
Transactional	Details about payments to and from your accounts with us.
Contractual	Details about the products or services we provide to you.
Locational	Data we get about where you are, such as may come from your mobile phone, the address where you connect a

	computer to the internet or where you provide us with an address.
Behavioural	Details about how you use our products and services.
Technical	Details on the devices and technology you use.
Communications	What we learn about you from letters, emails, social media activity and conversations between us.
Social Relationships	Your family, friends, and other relationships.
Open Data and Public Records	Details about you that are in public records such as the Electoral Register, and information about you that is openly available on the internet including social media.
Usage Data	Other data about how you use our products and services.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers' licence, or birth certificate, utility bills etc.
Consents	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you, reference checks, agreement before signing any contract.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number.
Special types of data	<p>The law and other regulations treat some types of personal information as special. We will not ordinarily record this data and only collect and use these types of data if you consent and the law allows us to do so:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic and bio-metric data</li> <li>• Health data including gender</li> <li>• Criminal convictions and offences</li> </ul>

Data we collect when you use our services. This includes the amount, frequency, type, location, origin and recipients:

- Payment and transaction data.
- Profile and usage data. This includes the profile you create to identify yourself

when you connect to our internet, mobile and telephone services. It also includes other data about how you use those services.

We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.

Data from third parties we work with:

- Companies that introduce you to us
- Financial advisers
- Lenders
- Solicitors and conveyancers
- Checking and referencing agencies such as Tenant Verify
- Other estate or letting agencies
- Comparison websites
- Social networks and marketing websites including Zoopla and Spareroom etc..
- Public information sources such as Companies House and the Land Registry
- Agents working on our behalf
- Market researchers
- Government and law enforcement agencies.

## SHARING YOUR PERSONAL INFORMATION

We may share your personal information with our staff and these organisations:

- Agents and advisers who we use to help run your accounts and services, collect what you owe, and explore new ways of doing business
- HM Revenue & Customs, regulators and other authorities
- Credit reference agencies
- Fraud prevention agencies
- Any party linked with you or your business's product or service
- Companies we have a joint venture or agreement to cooperate with
- Organisations that introduce you to us
- Companies that we introduce you to
- Market researchers
- Independent Financial Advisors, Lenders and Solicitors, utility companies and the local council
- Citizens Advice Bureau and similar organisations
- Companies you ask us to share your data with.

We may need to share your personal information with other organisations to provide you with the product or service you have chosen:

- Trades people such as plumbers and electricians and such like to facilitate managing and fulfilling our obligations
- If you use direct debits, we will share your data with the Direct Debit scheme.
- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.

- During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private.
- If the change to our Company happens, then other parties may use your data in the same way as set out in this notice.
- Companies who provide information to all of the above such as digital companies providing utilities or to trades.

## CREDIT REFERENCE AGENCIES (CRAS) – TENANT REFERENCING ONLY

We may carry out credit and identity checks when you apply for a product or services for you or your business. We may use Credit Reference Agencies to help us with this. If you use our services, from time to time we may also search information that the CRAs have, to help us manage those accounts.

We will share your personal information with CRAs and they will give us information about you. The data we exchange can include:

- Name, address and date of birth
- Previous addresses
- Application for Tenancy
- Details of any shared credit
- Financial situation and history
- Public information, from sources such as the electoral register and Companies House
- Employment type, role, employer

We'll use this data to:

- Assess whether you or your business is able to afford to make payments
- Make sure what you've told us is true and correct
- Help detect and prevent financial crime
- Manage accounts with us
- Trace and recover debts
- Make sure that we tell you about relevant offers.

When we ask CRAs about you or your business, they may note it on your credit file.

## FRAUD PREVENTION AGENCIES (FPA)

We may need to confirm your identity before we provide products or services to you or your business. Once you have become a customer of ours, we will also share your personal information as needed to help detect fraud and money laundering risks. We may use Fraud Prevention Agencies to help us with this. Both we and fraud prevention agencies can only use your personal information if we have a proper reason to do so. It must be needed either for us to obey the law, or for a 'legitimate interest'. A legitimate interest is when we have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you.

We will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contracts you or your business has with us.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime.

FPA's can keep personal information for up to six years if they find a risk of fraud or money-laundering.

These are some of the kinds of personal information that we use:

- Name
- Date of birth
- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial data
- Data relating to your or your businesses products or services
- Data relating to our relationship and communication and location
- Employment details
- Vehicle details
- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

#### IF YOU CHOOSE NOT TO GIVE PERSONAL INFORMATION

We may need to collect personal information by law, or under the terms of a contract we have with you. If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your account or policies. It could mean that we cancel a product or service you have with us.

#### MARKETING

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'. The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with. We may study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you. You can ask us to stop sending you marketing messages by contacting us at any time. Whatever you choose, you'll still receive statements, and other important information such as changes to your existing products and services.

## HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will keep your personal information for as long as you are a customer of Harrison Thorn. After you stop being a customer, we may keep your data for up to 6 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 6 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

## HOW TO GET A COPY OF YOUR PERSONAL INFORMATION

Under the General Data Protection Regulations, you have the right of access to your personal data. For further details on how to request a copy of your information, please call us on 01530 450590 or write to us at this address shown below.

## LETTING US KNOW IF YOUR PERSONAL INFORMATION IS INCORRECT

You have the right to question the information we have about you that is wrong or incomplete. Please contact us if you want to do this. If you do, we may take reasonable steps to check its accuracy and correct it.

## WHAT IF YOU WANT US TO STOP USING YOUR PERSONAL INFORMATION

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'. There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

## WITHDRAWING YOUR CONSENT

You can withdraw your consent at any time. Please contact us if you want to do so. If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

## HOW TO COMPLAIN

Please let us know if you are unhappy with how we have used your personal information. You can contact us at the following address:

Harrison Thorn Ltd  
Rothley House  
Coalville Business Park

Coalville Leicestershire  
LE67 3NR

If you have any questions, or want more details about how we use your personal information, you can ask us by calling 01530 450590