Steps Estate Agents customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- <u>Contact details</u>
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Post

Steps Estate Agents, 298 Heathway, , DAGENHAM, Essex, RM10 8LU, GB

Telephone

020 8593 5933

Email

dagenham@steps.me.uk

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses

- Gender
- Pronoun preferences
- Occupation
- Date of birth
- Marital status
- Payment details (including card or bank information for transfers and direct debits)
- Financial data (including income and expenditure)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Employment details (including salary, sick pay and length of service)
- Credit history and credit reference information
- Information relating to compliments or complaints
- Video recordings
- Audio recordings (eg calls)
- Records of meetings and decisions
- Account access information
- Website user information

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses

- Account information, including registration details
- Marketing preferences

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Profile information
- Marketing preferences
- Website and app user journey information

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Client account information
- Any other personal information required to comply with legal obligations
- Safeguarding information

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible <u>lawful bases</u> in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your

data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. <u>Read more about the right to rectification</u>.
- Your right to erasure You have the right to ask us to delete your personal information. <u>Read more about the right to</u> <u>erasure</u>.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- Your right to object to processing You have the right to object to the processing of your personal data. <u>Read more</u> about the right to object to processing.
- 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. <u>Read more about the right to data</u> <u>portability</u>.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. <u>Read more about the right to withdraw consent</u>.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are: • Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

• Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Where we get personal information from

- Directly from you
- Publicly available sources
- Credit reference agencies

How long we keep information

We retain your personal data only for as long as we need to comply with our obligations under The Property Ombudsman Code of Practice and rules set by HMRC. The retention periods are:

- Seven years for data related to a financial transaction with Steps Estate Agents (such as an Instruction to market a property)
- Six years for data related to a property transaction (such as an Offer)
- Five years for data related to our obligations under Anti-Money Laundering regulations
- 18 months for other personal data not covered by one of the above.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

Others we share personal information with

- Debt collection agencies
- Other financial or fraud investigation authorities
- Insurance companies, brokers or other intermediaries
- Professional or legal advisors
- Emergency services
- Regulatory authorities
- Organisations we're legally obliged to share personal information with

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: <u>https://www.ico.org.uk/make-a-complaint</u>

Last updated