

## **PRIVACY POLICY**

### **1. Our Privacy Policy**

1.1 At Andrew Pridell Associates Limited we take the privacy of personal data shared with us by clients, organisations and individuals very seriously. This policy explains the basis upon which we use and process any personal data that we collect or you provide to us at any time.

1.2 Tom Hobman, as Director of Andrew Pridell Associates Limited, Mainstone House, Mainstone Road, Hove, East Sussex BN3 5HL ("we" / "us") is the Data Controller for the purposes of all personal data we process. Any questions or requests relating to this Privacy Policy should be directed to 'The Data Controller' at [info@apassociates.org](mailto:info@apassociates.org) or Mainstone House, Mainstone Road, Hove, East Sussex BN3 5HL.

1.3 We may update this Privacy Policy from time to time. Any changes will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

### **2. What personal data we hold**

2.1 We may collect and process personal data where it is necessary and justified in order to conduct our business effectively, or where doing so is lawful or for a legitimate purpose. Personal data may include identification details such as name, postal address, telephone number, e-mail address, bank details, passport, driving licence and National Insurance details.

2.2 We will not ask you to provide sensitive personal information which can include, inter alia, information relating to your race, ethnic origin, your political opinions, your religious beliefs, whether you belong to a trade union, your physical or mental health or condition or your sexual life. If you have been asked to provide this information, please contact the Data Controller (as above).

### **3. How we collect personal data**

3.1 We collect personal data when :-

a. You provide information to us - perhaps by completing a contact or other form on our website [www.apassociates.org](http://www.apassociates.org) ("our website") or by contacting us by telephone, e-mail or in any other form, including when you subscribe to a legal update or view our website. You may also provide us with personal data on behalf of a third party. In doing so, you confirm that the third party has consented to the processing of their data or that you have a lawful or otherwise legitimate purpose for providing the data to us.

b. Your data is provided to us by a third party - Where you or our client(s) have been referred to us for professional services and advice. We will inform you upon request of the source of your information.

c. We collect information about you - We may obtain from you automatically or from third parties the following information:-



- Technical information relating to your use of our website and our publications including the Internet protocol (IP) address used to connect your computer to the Internet; and
- Where we work with third party contractors or other parties in areas such as technical, payment and delivery services, credit reference agencies and others, we may receive information about you from them.

#### **4. Cookies**

4.1 Our website uses cookies to enable us to distinguish you from other users of our website and provide us with information as to how you have used our website. We use this information to assist us in providing to you with a website that suits the users' needs. For example, we may monitor how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider. This information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

4.2 If you do not wish to provide this information you can set your browser such that it will not accept cookies. You can obtain further information on how to do this at the website below. Please note however that some of our website features may not function fully, or at all, for you as a result.

4.3 For more information on cookies visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).



## 5. How and why we process personal data

We use personal data for the following purposes :-

| Purpose for processing data  | Legal basis for processing data  |
|--|--|
| The performance of the contract we have with you to provide professional services or advice.                 | To comply with the requirements of the contract.   |
| Invoicing our services and securing payment.   | To comply with the requirements of the contract.   |
| Providing professional updates or other information we consider will be of interest to you or your business. | <ul style="list-style-type: none"><li>• Where you have provided express consent, or</li><li>• Where it is necessary for your legitimate business interests ,</li><li>• Or</li><li>• Where it is necessary for our legitimate business interests.</li></ul> |
| Monitoring and recording information relating to the use of our services including our website.              | Our legitimate purposes to review and improve our services and website.  |
| For recruitment purposes.  | Where you have provided express consent.   |
| Where necessary to comply with the law.  | In order to comply with our legal obligations.   |





## **6. Who will we share personal data with**

6.1 We may disclose the information that we hold about you to business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you, the Royal Institution of Chartered Surveyors and other regulators of our business, analytics and search engine providers that assist us in the improvement and optimisation of our website, credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

6.2 We will not disclose your personal data to any third party without your consent except when necessary in relation to any supply of our services to you, or in order to protect against fraud or any other crime, or where disclosure is otherwise permitted or required by law, or in the unlikely event that we sell our business or it is acquired by a third party, to that purchaser or third party.

## **7. Retention of personal data**

7.1 We have legal obligations to retain records containing personal data even after the main purpose of a relationship or contract has ended. We retain records and personal data for minimum periods that we consider appropriate in all the circumstances.

7.3 We maintain appropriate security standards and procedures to prevent unauthorised access to or disclosure of your information.

7.4 Unfortunately, and as you may already be aware, the transmission of information by post or via the internet is not entirely secure. Whilst we will do our best to protect your personal data, we cannot guarantee the security of it when transmitted to our site, to you via email or other electronic means or by the postal services. You accept that any transmission of information 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. If you have any particular concerns about your information, please contact us.



## 8. Your rights

Under data protection legislation, you have the following rights :-

|                              |  |
|------------------------------|--|
| Right to be informed         | This privacy policy fulfils our obligations to inform you about the ways we use your personal data.  |
| Right to access              | You have the right to access the personal data we hold for you. This is known as a 'Subject Access Request'. Save in exceptional circumstances, you can obtain this information at no cost.  |
| Right to rectification       | If any of the information we hold about you is inaccurate, you have the right to request that your personal data is rectified.   |
| Right to be forgotten        | You can ask that we erase all personal information that we hold about you.<br>We will action this request where it is appropriate for us to do so.   |
| Right to restrict processing | You have the right to block or suppress processing of your personal data. When processing is restricted, we are permitted to store the personal data but not further process it.   |
| Right to object              | You have the right to object to the continued use of your data where you have provided consent (i.e. you can withdraw consent at any time) or where we have considered it necessary to use your personal data for legitimate purposes. |
| Right to data portability    | You may request that your personal data be moved, copied or transferred to another organisation.   |

You should write to the Data Controller referred to at clause 1.2 to exercise any of these rights.

## 9. Complaints

9.1. Should you have any comments or complaints regarding this Privacy Policy or our use of your personal data, please contact the Data Controller referred to at clause 1.2.

9.2. You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), who may be contacted at Wycliffe House, Water Lane, Wilmslow.

