Privacy and Your Personal Information

The Leaders Romans Group must look after your personal information by law. The main legislation that applies to protecting your information is:

- General Data Protection Regulations (EU) 2016/679 (GDPR)
- Data Protection Act 2018 (DPA)
- Human Rights Act (Article 8) (HRA)
- Privacy and Electronic Communications Regulations 2003 & 2011 (PECR)
- Money Laundering Regulations 2017
- Proceeds of Crime Act 2002

1. Who we are

This Privacy Notice applies to the use and processing of personal information collected under our trading names Leaders, Romans, Boyer, Revolution, Scott Fraser, Outlook, Moganie James, Hello Ted, Bode Insurance Solutions and Dunlop Heywood, which form part of the Leaders Romans Group. The Leaders Romans Group Limited is the Data Controller and we have a legal duty to protect any information we collect from you. The phrases ‘us’, ‘we’ or ‘our’ will mean those businesses listed above which form the Leaders Romans Group Limited.

Our statutory Data Protection Officer is Zara Harrington. She can be contacted by email at dataprotection@lrg.co.uk or in writing at Crowthorne House, Nine Mile Ride, Wokingham, Berkshire RG40 3GZ.

2. Information covered by this Privacy Notice

This Privacy Notice covers use of personal information as defined in the Data Protection Act 2018. Personal data. This is information, or any combination of separate pieces of information, that could be used to identify you. This includes your name, address, contact details etc.

“Special category” personal data. This sensitive personal information is given more protection in law. For example, details of your health or nationality.

For more details of these definitions see below.

<table>
<thead>
<tr>
<th>Personal data</th>
<th>Special category</th>
</tr>
</thead>
<tbody>
<tr>
<td>is any information relating to an identified or identifiable natural person “a data subject”; an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as their name, alias, address, national insurance number, telephone number, email, contact information, financial information, IP address. It can include information in different formats including electronic data, hand-written notes, voice recordings, photographs, CCTV footage.</td>
<td>personal information which reveals racial or ethnic origin, political opinions, religious/spiritual/philosophical beliefs, trade union membership, genetic or biometric data, physical or mental health data, sex life or sexual orientation data, criminal or alleged criminal offences.</td>
</tr>
</tbody>
</table>

3. Where do we get personal information from

When you enquire or register for products and services provided by the Leaders Romans Group Limited we may collect personal information from a variety of sources.

The majority of the personal information we collect will have been provided by you during the course of your relationship with us either through face to face contact, by telephone, email or electronic communication such as messaging or emails.

However, we may also obtain your personal data from other sources including:

- information we collect when you visit our websites, please see our Cookies Policy here
- other Leaders Romans Group companies, for example our mortgage brokering service
• companies which support advertising services that promote our services including online property portals (such as Rightmove and Zoopla), social media and networking sites (such as Facebook and Twitter) and online advertising platforms
• information provided to us by other third parties, such as your solicitor
• other publically available sources such as the Electoral Roll and Land Registry

4. What information do we collect
We collect your personal information based on the service or services we are offering you. We will only collect the information needed. We will not sell your personal information to anyone. Some examples of information we may collect directly from you, can be found here:-

<table>
<thead>
<tr>
<th>Information we may collect directly from you</th>
<th>Why we collect it</th>
</tr>
</thead>
<tbody>
<tr>
<td>Your name, address, phone number, email address and your needs</td>
<td>To provide you with estate agency services to find a property to buy or sell</td>
</tr>
<tr>
<td>Your marital status, date of birth, nationality, employment details</td>
<td>When you enter into a residential sale or letting agreement</td>
</tr>
<tr>
<td>Your date of birth, nationality and details from identity documents you provide</td>
<td>To perform anti-money laundering and rent referencing checks (as required by law)</td>
</tr>
<tr>
<td>Proof that you have available funds to support any offer that you make to buy a property</td>
<td>To ensure you able to pay the required amount of deposit</td>
</tr>
<tr>
<td>Financial information, like a copy of your bank statement or a mortgage offer</td>
<td>To provide evidence of your capability to buy a property</td>
</tr>
<tr>
<td>Details of your mortgage arrangements and how long you have owned your property when you register to sell</td>
<td>To perform anti-money laundering checks (as required by law)</td>
</tr>
<tr>
<td>Details of any mortgage, insurance, licensing documentation and service contracts which you have in place regarding a property you wish to let</td>
<td>Where you are a landlord and we are providing you with letting and/or management services</td>
</tr>
<tr>
<td>Your marital status, employment details, national insurance number, nationality, residential status, bank details and credit history</td>
<td>To carry out referencing and credit checks</td>
</tr>
<tr>
<td>Details relating to your property including photographs, floor plans, energy performance certificate, home condition reports, property description, virtual tour, walk through video</td>
<td>To deliver our service to you when you engage us to market a property for you</td>
</tr>
<tr>
<td>Photographs of your property, an inspection report and inventory, to accurately record the condition of your property at the start or end of a tenancy</td>
<td>So we can deliver our management and letting service to you</td>
</tr>
<tr>
<td>Moving in and out dates and corresponding utility meter readings</td>
<td>So we can deliver our management and letting service to you</td>
</tr>
<tr>
<td>Your moving in and out dates, and details of the deposit paid where you are a tenant when registering or releasing any deposit from a deposit protection scheme</td>
<td>To fulfil our contract of service</td>
</tr>
</tbody>
</table>
Your name, gender, previous name(s), date of birth, telephone numbers, current address, previous addresses, details of your health, any dependents, your nationality, bank account details, savings, investments, existing financial commitments, your credit history, your mortgage requirements and existing protection requirements

To enquire or apply for a mortgage or insurance protection products on your behalf

Your communication and marketing preferences

To ensure we only send you details of properties and services you are interested in via your preferred communication method (as required by law)

We may request additional information from you which is relevant to the provision of specific services. If we do this, we will always tell you why the information is needed.

If you ask us to provide you with life, critical illness, or landlord insurance and we may need to gather “special category” personal information, we treat this sensitive information in accordance with the additional protection it is given under the Data Protection Act 2018 and GDPR.

Telephone calls may be recorded for training, monitoring, and security purposes. We will always advise you before any recording commences.

Information we collect when you visit our websites

We use cookies and other technologies to collect information when you visit our web sites, including when you make use of our online chat.

We may collect personal information in connection with your use of our website, such as:

- your name, email address, telephone number and property address when you register to arrange a viewing, register for property alerts, request a valuation, lettings appointment, book a mortgage appointment or submit an enquiry
- data sent from your browser may include, the date, time and length of your visit, the site from which you have come (for example Google, Firefox etc.) and your IP address

Details of how we use cookies are provided in our Cookies Policy.

Information obtained from online portals

Where you contact us via online portals such as Rightmove or Zoopla, we will use your contact details to enable us to communicate with you and offer the services you have enquired about.

Information obtained from third parties

Where we are required by law, or for legitimate business needs, we will obtain information about you from third parties, but only after we have your consent to do so. For example, the third parties we may need to contact include: credit reference agencies, employers, banks, solicitors etc. in order to obtain references, verify your identity and confirm your income.

Criminal disclosures

Certain types of insurance may involve disclosure by you of information relating to historic or current criminal convictions or offences. When we process any criminal records checks we do so in accordance with The Data Protection Act 2018 (Schedule 1, Part 3, Paragraph 33) and relevant legislation. We will only carry out such checks where they are necessary.

5. How we use your information

We will process the information you provide or we obtain from other sources to provide you with products and services and answer any questions you may have. If you would like to see some examples of the how we use your information in the services we offer, please see below:-

...
Customer Surveys
We may invite you to participate in surveys from time to time to help us gather feedback on our products and services, so that we can make improvements. We may use a third party company to carry out these surveys on our behalf.

Credit scoring & Automated Decisions
Some of the services provided by third parties may involve an automated decision or credit scoring to determine whether we are able to provide a service or product. You have a right to challenge an automated decision and ask for the issue to be considered by human intervention.

6. Lawful basis of processing your personal information
The Leaders Romans Group processes your personal information under any of the following lawful conditions:

Consent Article 6 (1)(a) GDPR - if we process information under consent we will seek your clear and affirmative consent before processing your data, for example, to receive marketing information of properties for sale or to let.

Performance of a contract Article 6 (1)(b) GDPR - this is where the collection and processing of your data is necessary for the performance of a contract to which you are a party.

Legal obligation Article 6 (1)(c) GDPR - where the collection and processing of your personal data is necessary for compliance with a legal obligation, for example, to comply with the Data Protection Act, verify your identity, for fraud and money laundering prevention.

Legitimate interests Article 6 (1)(f) GDPR - some personal information is processed by the Leaders Romans Group as part of its legitimate interests which includes direct marketing, web analytics, sales and lettings.

The lawful basis for processing “special category” personal information
The Leaders Romans Group processes “special category” information only when it is necessary. The lawful basis we use to process your “special category” information is:

Explicit Consent Article 9 (2)(a) GDPR – is freely given, specific and unambiguous consent before the processing of your data. For example, your health information will be needed to process an application for critical illness insurance.

Data that has been made public Article 9 (2)(e) – such as Electoral Roll or Land Registry data.

Establishing, exercising or defending a legal claim Article 9 (2)(f) GDPR – for advice on underwriting, arranging or administering an insurance contract (Schedule 1 Part 2 of Data Protection Act 2018) or on the suspicion of money laundering in line with the Proceeds of Crime Act 2002 (Section 339ZB)
You may want to inform us of your “special category” data voluntarily to enable us to offer you appropriate products or services. For example, you may have a health condition that means you are unable to climb stairs. We will record your needs/preferences without recording your medical/health conditions in most cases.

**Withdrawing consent**
You have the right to withdraw your consent at any time. Please contact the branch or office you have been dealing with.

**Children’s privacy**
We do not offer any products or services to children (defined as under the age of 16 in GDPR). In some circumstances, for example a mortgage application, we may be required by the mortgage provider to collect the names and dates of birth your dependent children or other adults who may reside with you.

7. **Who we share your information with**
We may share information within the Leaders Romans Group to provide you with an agreed product or service, for example planning advice or mortgage services or for any other purpose agreed by you.

**Third Party service providers**
Where we engage third party service providers to provide products (such as mortgages, home/contents insurance or utility services) or business services, (such as credit reference checks) we provide them with the minimum personal information needed to perform the service or provide the product we have requested. We ensure all third party service providers understand they are required to protect your information, and not to use it for any other purpose.

If you would like to see the third party organisations we share your information with and why, please below:-

<table>
<thead>
<tr>
<th>Third party</th>
<th>Why we share your personal information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approved contractors</td>
<td>To install for sale or to let boards, to appoint managing agents and building maintenance contractors, to arrange EPC visits, to arrange for contractors to provide safety &amp; statutory tests and to take inventories</td>
</tr>
<tr>
<td>Surveyors</td>
<td>To undertake a structural or Homebuyers survey</td>
</tr>
<tr>
<td>Solicitors or conveyancers</td>
<td>To provide home conveyancing services</td>
</tr>
<tr>
<td>Mortgage lenders/Banks</td>
<td>To progress your enquiry or application for a residential or buy to let mortgage application</td>
</tr>
<tr>
<td>Insurance Companies</td>
<td>To progress your enquiry or application for buildings and contents insurance, critical illness cover or rent guarantee</td>
</tr>
<tr>
<td>Rent and Legal insurance providers</td>
<td>To set up landlord insurances, and in the event of a claim</td>
</tr>
<tr>
<td>Solicitors</td>
<td>To pursue a claim for breach of tenancy agreement</td>
</tr>
<tr>
<td>Referencing Companies</td>
<td>To check your creditworthiness, obtain a tenant references and to help prevent fraud and money laundering</td>
</tr>
<tr>
<td>Local Authority</td>
<td>For the payment of Council Tax</td>
</tr>
<tr>
<td>Law enforcement bodies including the police, HMRC and local Council</td>
<td>To comply with court orders or legal obligations</td>
</tr>
<tr>
<td>Landlord, tenant or guarantor</td>
<td>To comply with our legal obligations where we are providing a lettings service</td>
</tr>
<tr>
<td>The parties whose property you have viewed or on whose property you have submitted an offer</td>
<td>To communicate your offer or feedback on the viewing</td>
</tr>
<tr>
<td>Utility Companies</td>
<td>For payment of utility bills</td>
</tr>
</tbody>
</table>
8. How long we keep your information for
We are required to keep your information for as long as is reasonably necessary to fulfil our legal and regulatory obligations. We have a Retention and Destruction Schedule to ensure we comply with the relevant legislation when processing your information.

- For lettings we keep your information for 8 years after you have stopped using our service.
- For property sales we keep your information for 2 years after the sale has been completed.
- For property auctions we keep your information for 8 years after the sale has been completed.
- For planning advice and design, we keep your information for 4 years.
- For financial records, we keep your information for 8 years if your application is successful.
- For insurance policies, mortgages and records, we keep your information for 30 years.
- For general enquiries and marketing, we will keep your information for 2 years.
- Any copies of ID documents needed to verify your identity will be kept on file for anti-money laundering for 5 years. For tenancy reference checks we will keep your information for 1 year.

Anonymised information on properties and geographical areas may be kept for longer to assist us with property market forecasting and trends. Anonymised information is not subject to privacy legislation or the Data Protection Act and may be kept for as long as it is needed.

9. Our marketing services
Where you contact us via our website, in branch or by phone, or via online portals such as Rightmove or Zoopla we will use the details you have supplied to us to provide you with properties by email. You can choose to unsubscribe at any time.

We may contact you to offer information about our other products and services which we believe may be of interest to you. We use several methods of communication, including:

- By email
- By post
- Mobile Text Messages
- Telephone

We only send you promotional emails, mail, text messages or contact you by telephone, if you agree to each method of communication. You can stop receiving promotional mail, text messages or telephone calls by contacting your local branch. If you would like to unsubscribe from our email service please contact dataprotection@lrg.co.uk  Email communications will stop within 7 days.

10. Your statutory rights
You have a number of rights concerning the personal information we process about you. You have the right to:

- ask us for access to a copy of your personal information we hold about you. This is called a data subject access request. We may ask you to provide ID to verify your identity.
- ask us to correct your personal information if it is inaccurate. We may ask you to provide confirmation to ensure the information we hold is accurate.
- ask us to delete your personal information. We are unable to delete your information if the law requires us to keep it for a statutory period or there is a lawful reason we must keep the information. We will always investigate any request and advise you, if we are unable to erase your data.
• **withdraw your consent** to use your personal information. Where you have provided consent for our processing of your personal data, you may withdraw that consent at any time by simply contacting the branch or team you have been speaking to.

• ask us to **restrict the use** of your personal data, including direct marketing.

• **object to** our use of your personal data for our legitimate business interests. You have an absolute right to object to our use of your data for direct marketing.

• **object to an automated decision.**

**Subject Access Request**

If you wish to make a request for access to a copy of your personal data, or to exercise any of your other rights, please write to your local branch in the first instance. Further information on the request process and a subject access request form is available from dataprotection@lrg.co.uk. Please be aware if we receive all the necessary information with your request, we are able to locate your data and send it to you more quickly. We will endeavour to respond to and comply with your request as quickly as possible. We are aware of the statutory deadline for a subject access request, however we will always try to send your information before the legal deadline.

**Making a data subject access request**

1. We need sufficient information for us to locate your personal data. We do not have a single database and some of your information may be held in paper files.
2. We need to know which of our companies has processed your information and the branch or office location.
3. If you are seeking information for just a period of time or a specific issue, please tell us as this will help us and speed up your request.
4. We may need to ask you for proof of your identity. It is an offence to request the personal information of someone else.
5. There is no fee for this service.
6. The statutory deadline is one month. We may extend this deadline if your request is complex.
7. You will receive all the information you are legally entitled to. You will not receive information regarding third parties or other individuals. You will not receive legally privileged information.

We have a form to assist you with your request, it is available from dataprotection@lrg.co.uk

**11. How we protect your information**

We store your personal information on our electronic computer systems and in our paper filing systems. In accordance with the law we have strict security procedures to ensure that personal information is not damaged, destroyed or misused, and to prevent unauthorised access to your information. We have an internal breach reporting system to record all information security incidents and breaches. Serious data breaches are reported to the ICO within 72 hours, in accordance with the GDPR and the Data Protection Act 2018.

**12. Data Transfers**

The GDPR applies to all countries within the EU and European Economic Area (EEA). Therefore, countries in the EU and EEA are deemed to have appropriate and adequate legislation in place to protect your personal information. We will ensure that there is adequate security and comparable legislation in place before sending your information to other countries outside the EEA, for example the USA has Privacy Shield to demonstrate comparable security to the GDPR. In accordance with the Data Protection Act 2018 and GDPR, if we need to transfer data outside the EEA and the country it’s transferred to is not on an approved list for having adequate security controls in place, we will limit the amount of personal data we send. We will also impose contractual obligations or seek assurances from the recipients to ensure the security and confidentiality of your personal data to safeguard your information.

**13. Legal Information about the Leaders Romans Group**
The Leaders Romans Group Limited is a registered company. Our registered office address is Crowthorne House, Nine Mile Ride, Wokingham, Berkshire RG40 3GZ. Our registered number is 09939099.

Further information regarding the Leaders Romans Group can be found by visiting https://www.lrg.co.uk

The Leaders Romans Group Ltd is authorised and regulated by the Financial Conduct Authority.

Links to other websites
Our websites and communications with you may provide links to other websites for your convenience and information. These websites operate independently from us and have their own privacy notices or policies, which we strongly suggest you review. Where linked websites are not owned by the Leaders Romans Group, we are not responsible for their compliance with the Data Protection Act 2018 or other privacy legislation.

Updates to our Privacy Notice
We reserve the right to amend and update this Privacy Notice as required, therefore it is advisable you review this notice at regular intervals.

This Privacy Notice was last updated in July 2020.

14. Who to contact to make a complaint
If you wish to make a complaint to our statutory Data Protection Officer Zara Harrington please write to her at dataprotection@lrg.co.uk

You can seek independent advice and/or submit a complaint about data protection, privacy and data sharing issues directly to the Information Commissioner’s Office (ICO) at:

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

Website: https://ico.org.uk/ Email: casework@ico.org.uk  Telephone: 0303 123 1113

15. Legal information on the Leader Romans Group companies

<table>
<thead>
<tr>
<th>Trading Name</th>
<th>Legal Name</th>
<th>ICO registration number</th>
<th>Company registration number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leaders</td>
<td>Leaders Ltd</td>
<td>Z4721354</td>
<td>1690574</td>
</tr>
<tr>
<td>Romans</td>
<td>The Romans Group (UK) Ltd</td>
<td>Z6240564</td>
<td>2161874</td>
</tr>
<tr>
<td>Boyer</td>
<td>Boyer Planning Ltd</td>
<td>Z971775X</td>
<td>2529151</td>
</tr>
<tr>
<td>Revolution</td>
<td>Revolution Property Management Ltd</td>
<td>Z1545133</td>
<td>5877457</td>
</tr>
<tr>
<td>Bode Insurance</td>
<td>Bode Insurance Solutions Ltd</td>
<td>ZA572832</td>
<td>3101637</td>
</tr>
<tr>
<td>Scott Fraser</td>
<td>Scott Fraser Ltd</td>
<td>Z8310524</td>
<td>5480849</td>
</tr>
<tr>
<td>Moginie James</td>
<td>Moginie James Ltd</td>
<td>Z1106731</td>
<td>4791190</td>
</tr>
<tr>
<td>Outlook</td>
<td>Outlook Property Ltd</td>
<td>Z5533935</td>
<td>4214170</td>
</tr>
<tr>
<td>Hello Ted</td>
<td>Hello Ted Ltd</td>
<td>ZA539275</td>
<td>12061002</td>
</tr>
<tr>
<td>Romans Services</td>
<td>Romans Professional Services Ltd</td>
<td>Z7261725</td>
<td>2606388</td>
</tr>
<tr>
<td>LRG</td>
<td>LRG Financial Services Ltd</td>
<td>Z726842X</td>
<td>3155032</td>
</tr>
<tr>
<td>Moginie James FS</td>
<td>Moginie James Financial Services Ltd</td>
<td>ZA084842</td>
<td>9238824</td>
</tr>
<tr>
<td>Dunlop Heywood</td>
<td>Capgen Services Ltd</td>
<td></td>
<td>6598995</td>
</tr>
</tbody>
</table>