

## Privacy and Your Personal Information

### Mission Statement

At The Leaders Romans Group, we are passionate about safeguarding the personal data of all stakeholders - our valued customers, dedicated employees, and trusted partners. We believe that data protection is not just a legal requirement, but a moral imperative. That's why we go above and beyond to implement the most robust and state-of-the-art security measures to protect all personal data entrusted to us. We are committed to compliance with all relevant laws and regulations and will only use personal data for lawful business purposes. We strive to ensure that the data we collect is accurate, complete, and up-to-date, and that it is kept safe from unauthorised access, loss or damage. Data protection is at the core of our values, and we believe everyone has a right to privacy.

### Legislation

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 (UK) (GDPR UK)
- Data Protection Act 2018 (DPA)
- Human Rights Act 1998 (Article 8) (HRA)
- Privacy and Electronic Communications Regulations 2003 & 2011 (PECR)
- Money Laundering Regulations 2017
- Proceeds of Crime Act 2002
- The Data Protection, Privacy and Electronic Communications (Amendments etc.)(EU Exit) Regs 2019
- Telecommunications (Lawful Business Practice)(Interception of Communications) Regulations 2000
- Regulation of Investigatory Powers Act 2000 (RIPA)

### 1. Who we are

This Privacy Notice applies to the use and processing of personal information collected under our trading names:

**Bode Insurance Solutions, Boyer, Dunlop Heywood, First For Auctions, , GCS Estate Management, Gibbs Gillespie, Glide Property Management, Hose Rhodes Dickson, Island Holiday Homes, Leaders, Moginie James, Mortgage Scout, Portico, Relocate UK, Romans, Scott Fraser, SOWN, SPL Property Management, Three Sixty Space and The Acorn Group trading as Acorn Limited and its subsidiaries and associated businesses which includes: Acorn Estate Agents, Acorn Estate Management, Acorn Land & Commercial, Acorn Property Management, John Payne Estate Agents, Langford Russell Estate Agents, MAP Surveyors, Start Financial Services, Start Inventory Services, Start Lease Extensions, Start Mortgage Services, Unique.**

**The Leaders Romans Group Limited** is the overall **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](mailto:dataprotection@lrg.co.uk) or in writing at Crowthorne House, Nine Mile Ride, Wokingham, RG40 3GZ.

### 2. Information covered by this Privacy Notice

This Privacy Notice covers use of personal information as defined in GDPR UK & 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.

**Personal data** is any information about 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 address, contact information, financial information, IP address. It can include information in different formats including electronic data, hand-written notes, voice recordings, photographs, CCTV footage.

**Special category** personal information is 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.

### 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, on-line forms 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 publicly 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:-

Information we may collect directly from you	Why we collect it
Your name, address, phone number, email address and your needs	To provide estate agency and/or lettings services to buy, sell, or rent a property or to provide you with holiday rental booking services
Your marital status, date of birth, nationality, employment details	When you enter into a residential sale or letting agreement
Your date of birth, nationality and details from identity documents you provide	To perform anti-money laundering and rent referencing checks (as required by law)
Proof that you have available funds to support any offer that you make to buy a property	To ensure you able to pay the required amount of deposit
Financial information, like a copy of your bank statement, payslips or a mortgage offer	To provide evidence of your capability to buy a property or to be a guarantor
Details of your mortgage arrangements and how long you have owned your property when you register to sell	To perform anti-money laundering checks (as required by law)

Details of any mortgage, insurance, licensing documentation and service contracts which you have in place regarding a property you wish to let	Where you are a landlord and we are providing you with letting and/or management services
Your marital status, employment details, national insurance number, nationality, residential status, bank details and credit history	To carry out referencing and credit checks
Details relating to your property including photographs, floor plans, energy performance certificate, home condition reports, property description, virtual tour, walk through video	To deliver our service to you when you engage us to market a property for you
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	So we can deliver our management and letting service to you
Moving in and out dates and corresponding utility meter readings	So we can deliver our management and letting service to you
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	To fulfil our contract of service
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.

#### **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, book a holiday rental 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 third party 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 Article 10 GDPR UK. We will only carry out such checks where they are necessary.

#### **CCTV & Telephone Call recording**

We currently have CCTV installed in only a few branches for the prevention and detection of crime and to protect our business assets. All our cameras are overt and visible. Appropriate signage is displayed if CCTV is installed. Please ask branch staff if you have any concerns. CCTV may also be installed in some block management properties. CCTV signs will always be displayed.

We may record incoming telephone calls at our call centre, property management centres or branches for training and monitoring purposed only. You will hear a notification to advise you the call may be recorded however, not all calls will be recorded. Any recordings made are kept for one month before being over-written.

### **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.

The following are examples of how we use the information we collect:

- To provide estate agency services, including marketing your property, valuing your property, arrange and carry out accompanied viewings, selling your property and helping you search for a new home
- To provide a full lettings service for tenants, prospective tenants and landlords
- To provide full property management and maintenance services
- To provide holiday rental booking services, such as marketing your property, holiday reservations
- To advise on financial products, such as mortgages, insurance and protection products
- To provide property auction services
- To carry out regulatory checks to prevent fraud, unauthorised transactions, money laundering, tax evasion etc.
- To register a tenant's deposit with a deposit protection scheme
- To process payments of rent, and maintenance for you if a property is being let
- To arrange an energy performance certificate or home report/survey inspections for you
- To offer an inventory and check in/check out service for rented properties
- To liaise with utility companies and local authorities regarding property services
- To carry out tenant referencing and credit reference checks
- To carry out guarantor referencing and affordability checks
- To monitor and improve our products and services
- To enable you to take part in a prize draw, competition or complete a survey

#### **Customer Surveys**

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

### **Prize draws and Competitions.**

We may from time to time use your personal data to enable you to take part in a prize draw or competition and to contact you if you win a prize.

If you are entered into a prize draw or competition, you will be provided with specific terms and conditions that will apply and these will include details about how to opt in or out.

We do not use a third party to administer our prize draws or competitions and all prize draws and competitions will be administered by the Leaders Romans Group. We will let you know if we do decide to use a third party at any time in the future.

### **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.

***Processing is necessary for the performance of a task carried out in the public interest Article 6 (1)(e)*** for example carrying out money laundering checks.

***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)***

***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 UK). 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.

Please see below third party organisations we share your information with and why,:-

Third party	Why we share your personal information
Approved contractors	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 & statutory tests and to take inventories
Surveyors	To undertake a structural or Homebuyers survey
Solicitors or conveyancers	To provide home conveyancing services
Mortgage lenders/Banks	To progress your enquiry or application for a residential or buy to let mortgage application. Some mortgage lenders may keep anonymised data for their own purpose, in accordance with GDPR.
Insurance Companies	To progress your enquiry or application for buildings and contents insurance, critical illness cover or rent guarantee
Rent and Legal insurance providers	To set up landlord insurances, and in the event of a claim
Solicitors	To pursue a claim for breach of tenancy agreement
Referencing Companies	To check your creditworthiness, obtain references and to help prevent fraud and money laundering
Local Authority	For the payment of Council Tax
Law enforcement bodies including the police, HMRC and local Council	To comply with court orders or legal obligations
Landlord, tenant or guarantor	To comply with our legal obligations where we are providing a lettings service
The parties whose property you have viewed or on whose property you have submitted an offer	To communicate your offer or feedback on the viewing
OVO/Utilitel/Tili	To help set up services, utilities and council tax accounts on moving in and closing accounts at the end of your tenancy

Utility Companies	For payment of utility bills
Debt collection companies	To assist us in recovering any monies which are owed
Deposit Protection Scheme providers	To provide a Tenancy Deposit Protection Scheme
Focal Agent, I-Am Sold & Acaboom	To gather property sales information
ARLA Propertymark, a professional body responsible for raising professional standards amongst letting agents	If information relating to you is requested by them in order to protect your interests
The Information Commissioner's Office	If information relating to you is requested by them to investigate a concern you have raised with them
The Financial Ombudsman Service	If information relating to you is requested by them to investigate a complaint
The Property Ombudsman	Where they are providing a dispute resolution service in connection with letting services

### 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 6 years + 1 after you have stopped using our service.
- For property sales we keep your information for 6 years + 1 year 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 we keep your information for 6 years + 1 year after the policy expiry date.
- For mortgages and records, we keep your information for 30 years.
- For general enquiries and marketing, we will keep your information for 2 years.
- For block management we will keep your information for 7 years + 1 after you have stopped using our service.
- 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 2018 and may be kept for as long as it is needed.

### 9. Our marketing services

We may use your personal information for direct marketing purposes to contact you about our products and services available throughout the Leaders Romans Group of companies which we believe may be of interest to you. More details can be found in our Direct Marketing Policy - [CLICK HERE](#).

We will 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 [unsubscribe@lrg.co.uk](mailto:unsubscribe@lrg.co.uk) We aim to stop emails within 3 working days, but this may be extended to 10 working days over public holidays and to cover staff absence within the Data Protection Team.

Where you contact us via our website, in branch, by phone, or via online portals such Rightmove or Zoopla for help searching for a property to buy or rent, we will use the details you have supplied to us to provide you with property details by email. You can choose to unsubscribe at any time by contacting [unsubscribe@lrg.co.uk](mailto:unsubscribe@lrg.co.uk).



## 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.
- ask us to transfer your data if your information is processed by automated means.
- *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](mailto: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 business trading companies has processed your information and the branch or office location. (see list of trading names below)
3. If you are seeking information for a specific period of time or a specific issue, please tell us, as this will help us to fulfil your request and speed up our response to you.
4. We may need to ask you for proof of your identity. It is an offence to request the personal information relating to 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. Your request may be suspended if we need information from you to identify the location or business.
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 making your request, it is available from [dataprotection@lrg.co.uk](mailto: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 UK and the Data Protection Act 2018. We have our own internal IT Department and Cyber Security Team to monitor our systems and networks. Our Cyber Security Team is solely focussed on protecting our data and works closely with our Data Protection Team to comply with Article 32 of UK GDPR.

## **12. Data Transfers**

The GDPR UK applies to the UK only. GDPR UK is based on the GDPR EU which applies all countries within the EU and European Economic Area (EEA). The EU and the UK have agreed adequacy status for the continued free-flow of personal data within the UK, EU and EEA. We will ensure that there is adequate security and comparable legislation in place before sending your information to other countries outside the EEA. In accordance with the Data Protection Act 2018 and UK 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 (standard contractual clauses) in accordance with the EDPB (European Data Protection Board) (as approved by the ICO) from the recipients to ensure the security and confidentiality of your personal data to safeguard your information.

Whilst we always strive to keep our data in the UK and limit data transfers, we do use a cloud services provider for our customer data. Data back-ups are held outside the UK in accordance with GDPR for business continuity reasons. As with most global cloud service providers, the use of global back-up systems is common place.

## **13. 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 GDPR UK, the Data Protection Act 2018 or other privacy legislation.

## **14. Who to contact to make a UK GDPR or data protection complaint**

If you wish to make a complaint about our compliance with UK GDPR or data protection, please write to our statutory Data Protection Officer Zara Harrington, at [dataprotection@lrg.co.uk](mailto:dataprotection@lrg.co.uk)

*We ask you to state in your complaint, the following information to enable an independent investigation:-*

- *Your name, contact email address and the address of the property (if regarding a tenancy, a sale, maintenance issue, mortgage or insurance policy)*
- *The business trading name (see below), branch location and names of any staff members*
- *A description of the complaint, time period or relevant dates, and*
- *Please attach details if your issue relates to a letter, property description, copy of email etc.*

Once we have the information above, an investigation will be carried out by the Data Protection Team. We aim to respond to your complaint as soon as possible, but no later than 10 days from receipt. If you remain dissatisfied following a complaint to our Data Protection Officer, you can 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](mailto:casework@ico.org.uk) Telephone: 0303 123 1113

## **15. Legal information on the Leaders Romans Group Ltd**

- The ICO registration for The Leaders Romans Group Ltd is ZA781332.
- 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>
- These companies have the following regulatory status:

- Bode Insurance Solutions Limited is authorised and regulated by the Financial Conduct Authority
- The Romans Group (UK) Limited is an introducer appointed representative of Bode Insurance Solutions Limited
- Leaders Limited is an introducer appointed representative of Bode Insurance Solutions Limited
- LRG Financial Services Limited is an appointed representative of Mortgage Advice Bureau Limited and Mortgage Advice Bureau (Derby) Limited
- Mortgage Scout is an appointed representative of Mortgage Advice Bureau Limited and Mortgage Advice Bureau (Derby) Limited

#### 16. Legal information on the Leaders Romans Group companies

Trading Name	Legal Name	ICO registration number	Company registration number
Bode Insurance	Bode Insurance Solutions Ltd	ZA572832	3101637
Boyer	Boyer Planning Ltd	Z971775X	2529151
Dunlop Heywood	Capgen Services Ltd	ZA781326	6598995
First For Auctions	The Romans Group (UK) Ltd	Z6240564	02161874
GCS Estate Management	Hill & Clark Limited	C1331038	07551391
Gibbs Gillespie	The Romans Group (UK) Ltd	Z6240564	02161874
Glide Property Management	Hill & Clark Limited	C1331038	07551391
Hose Rhodes Dickson (Lettings)	Leaders Ltd	Z4721354	1690574
Hose Rhodes Dickson (Sales)	Leaders Sales Limited	ZB083083	4597727
Island Holiday Homes	Leaders Ltd	Z4721354	1690574
Leaders	Leaders Ltd	Z4721354	1690574
Leaders Sales	Leaders Sales Limited	ZB083083	4597727
LRG	The Leaders Romans Group Ltd	ZA781332	09939099
LRG Employees Limited	LRG Employees Limited	ZB231379	10854720
LRG Financial Services Ltd	LRG Financial Services Ltd	Z726842X	3155032
Moginie James	The Romans Group (UK) Ltd	Z6240564	02161874
Mortgage Scout	LRG Financial Services Ltd	Z726842X	3155032
Portico	Leaders Ltd	Z4721354	1690574
Relocate UK	Relocate UK Ltd	Z7053756	3009421
Romans	The Romans Group (UK) Ltd	Z6240564	02161874
Romans Services	Romans Professional Services Ltd	Z7261725	2606388
Scott Fraser	Scott Fraser Ltd	Z8310524	5480849
SOWN	The Romans Group (UK) Limited	Z6240564	02161874
SPL Property Management	Hill & Clark Limited	C1331038	07551391
Three Sixty Space	The Romans Group (UK) Limited	Z6240564	02161874

#### The Acorn Group of companies

Trading Name	Legal Name	ICO registration number	Company registration number
Acorn Estate Agents	Acorn Limited	Z7249530	4398269
Acorn Estate Management	Acorn Estate Management Ltd	ZA611698	5043554
Acorn Land & Commercial	Acorn Land & Strategic Property Division Ltd	4990798	ZA611732
Acorn Property Management	Acorn Limited	Z7249530	4398269
John Payne Estate Agents,	Acorn Limited	Z7249530	4398269
Langford Russell Estate Agents,	Acorn Limited	Z7249530	4398269
MAP Surveyors	Maitlands Acorn Professional Limited	ZA633679	5043613

Start Financial Services, Start Mortgage Services, Start Lease Extensions, Start Inventory Services,	Acorn Limited	77249530	4398269
Unique	Acorn Limited	77249530	4398269

**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: 15 August 2023.