

moveTM
withUS

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Property Sales and Services Privacy Policy (UK)

Introduction

This policy has been updated to incorporate our new obligations under the EU General Data Protection Regulation as of May 2018.

Partners in Property (UK) Limited and its subsidiary companies, Move with Us, or any name incorporating Move with Us is a trading style of Partners in Property (U.K.) Limited. Partners in Property (UK) Limited is part of the Move with Us Limited group of companies (for the purposes of this privacy policy reference to “us” “we” “our” or “Move with Us” means and includes Move with Us Limited and all their subsidiary companies).

This privacy policy sets out how Move with Us will use, protect, and disclose personal information that clients, customers, applicants, employees, and any other third parties may provide us with.

Partners in Property (UK) Limited is registered at Companies House. Our company registration number is 03332891. Registered office: Grant Hall, Parsons Green, St Ives, Cambridgeshire PE27 4AA. We are registered as a Data Controller at the Information Commissioner’s Office (“ICO”) in accordance with the Data Protection Act 1998 (the “Act”). Our ICO registration number is Z3171965.

If you have any questions about this privacy policy or our use of your personal information, please contact our Data Protection Officer using the contact details in the section “How to contact Move with Us” below.

How to contact us:

Move with Us Limited
Grant Hall
Parsons Green
St. Ives
Cambridgeshire
PE27 4AA

01480 409 590

info@movewithus.co.uk

Please address your queries to our Data Protection Officer

Who we work with and what we do

Move with Us provides services to some of the UK’s leading lenders, house builders, probate practitioners and housing associations as detailed below:

The Move with Us property sales service specialises in managing all aspects of the sales process. The property Sales team value, manage and sell property on behalf of our corporate clients. This includes part exchange and assisted sale, probate property sales.

The Move with Us Property services team provide a comprehensive range of specialist asset management services to mortgage lenders. This include repossession asset management, receivership, and in-house maintenance services.

If Move with Us is provided with personal information under contract via a third party, it is likely we will be acting as a Data Processor or acting as Joint Controllers. If this is not the case, then Move with Us will be acting as the Data Controller.

Types of information collected

Personal Information

Personal information is information which can identify you as a living individual, whether by itself or when used in conjunction with other information which we hold or are likely to hold. We take our obligations under the Act seriously. To this end, we have a Data Protection Officer and internal policies which relate to the protection of personal information. In addition, we regularly train our staff on data protection compliance.

Move with Us may collect and process the following personal information:

- Information provided to us by a client or customer which may include name, contact details, (including email address, postal address, past address, telephone numbers (mobile and fixed line) mortgage account details where applicable of the data subject
- Date of birth
- Gender
- Marital status
- Residential status
- Dependent information
- Copies of identification
- Online identifier Information
- Information relating to any communications sent to us via email or telephone calls (call recording) including the communication content
- Any unrequested official documents provided by the data subject
- Property information

Special Category data

This is a more sensitive category of personal information which relates to (e.g.) a person's race, sexual life, criminal allegations or offences, trade union membership or their mental or physical health.

The special categories include personal data around:

- Race
- Ethnic origin
- Politics
- Religion
- Trade union membership
- Genetics
- Biometrics (where used for ID purposes)
- Health
- Sex life or sexual orientation

The processing of SCD does not normally form part of our core processing but due to the COVID-19 pandemic, Move with Us may be required to process data in relation to an individual's health, in order to protect the vital interests of all parties involved. In line with the GDPR's data minimisation principle Move with Us will only collect personal data that is adequate, relevant and limited to what is necessary in relation to the relevant purpose, which in this case is to safeguard employees, customers, clients and suppliers against the current health threat.

The GDPR requires that organisations only collect as much personal data and / or SCD as is strictly necessary for the purposes being pursued.

How personal data is obtained

The data subject may provide Move with Us with personal information by:

- Participating in a telephone conversation
- Call recordings
- Means of an enquiry
- Means of a complaint

Personal information relating to a data subject may also be received from third parties via online portals, email and telephone communications. Third parties include but are not limited to:

- Our clients
- Health providers (where consent has been obtained from the data subject)
- Next of kin
- Third party service suppliers (who have obtained consent or where a contractual obligation exists)

In addition, third parties such as estate agents, letting agents, lenders, banks, residential developers, companies operating other websites and receivers acting for banks and lenders may collect personal information from you for direct marketing purposes. We may obtain your personal information from those third parties with the intention of using it to send you direct marketing about our products and/or services (or those of our parent company). We take steps to ensure that we do this only when you provide the appropriate consents to those third parties to permit this.

We are not responsible for the privacy practices of third parties. They should provide you with their own "fair processing notice" (for example, a website privacy policy) when they collect your personal information. It should identify them as Data Controller; provide a valid contact address and give you fair notice that they will pass on your personal information to other companies such as Move with Us for particular purposes including direct marketing purposes. In addition, as explained above, we take steps to ensure that those third parties collect appropriate consents to permit your personal information to be used by us for direct marketing purposes.

Having obtained your personal information from a third party we would issue you with our own "fair processing notice" at an appropriate time (for example, by pointing you towards this website privacy policy). We would also provide you with the appropriate mechanisms to alter your direct marketing preferences (i.e. to change your mind about whether you wish to receive it or not) and we would record any altered preferences as soon as reasonably possible.

The purpose of processing

The purpose for processing will be in accordance with data protection law and contractual agreements that are in place with the Data Controller or the Data subject. We are legally and contractually bound to ONLY process the personal data for the purpose for which it was collected as stated in this policy & supporting contracts.

The purposes for processing include:

- Contacting the data subject for the purpose as specified within the contract or agreement with the Data Controller
- Making arrangements to sell or rent the property
- Sharing of data with third parties such as agents and contractors for the sale/purchase/rental of the property
- Contacting data subjects to make arrangements for the purchase of a property
- Contacting data subjects to obtain information relating to the rental of a property
- Processing complaints
- Providing feedback to the client
- Processing payments

This list is not exhaustive, and it may be updated in the future. It is a fair reflection of some of the current purposes for which we may use of the personal information provided to us.

The lawful basis for which we process personal information.

The lawful basis for processing personal data will vary depending on the services provided. The lawful basis for processing personal data are set out in Article 6 of the GDPR. At least one of these will apply whenever we process personal data:

- Consent: clear consent has been given by the individual for Move with Us to process their personal data for a specific purpose
- Contract: the processing is necessary for a contract we have with an individual
- Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligation).
- Vital interests: the processing is necessary to protect someone's life
- Public task: the processing is necessary for us to perform a task in the public interest
- Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. To comply with our legal, regulatory, and other governance obligations

Data supplied by you for the purposes of our services is stored in our data centre currently hosted at Telehouse. Details of Telehouse security standards can be found [here](#).

Information we share

Except as otherwise set out in this section, we will not transfer, disclose, sell, distribute or lease your personal information to third parties unless we have your permission or are permitted or required to do so by law or legal process.

Where applicable we will share information with:

- Third parties which provide services to us including organisations which assist us in providing our products and/or services to you, organisations which we use to fulfil a contract, or which provide other business support services to us (for example, EPC providers, help desks, law firms, cloud services, regulatory bodies and authorities where applicable). In accordance with the Act, we will impose restrictions and standards in our written contracts/ agreements with service providers to ensure they keep your personal information secure and use it only for the purposes for which it was provided to them
- View My Chain and TwentyCi Group for the purposes of chain progression, market analysis and marketing and other communications
- Clients acting as the Data controller
- Receivers
- Payment service providers

We may disclose your personal information to our parent company and third parties carefully selected by Move with Us so that they may send you direct marketing about their own products and/or services (but only when you provide the appropriate consents to permit this – please refer to the section “Direct Marketing” below).

We may sell your personal information to third parties where necessary as part of our legitimate business processes (for example, in the event that our shares are purchased by third parties; in the event that our management or administration is to be taken over by third parties or in the event that our assets (for example, our customer databases or contact lists) are purchased by third parties). Should we do this we would ensure it was carried out in accordance with the Act.

We may be required by law or legal process to release your personal information to local or central government authorities, official agencies, or legal authorities (i.e. courts, tribunals, police, or security services). In order to maintain the integrity of this website and safeguard the interests of its customers and subscribers, we will comply with any such request. In addition, we may be required to disclose your personal information to government authorities for tax or other purposes. In other circumstances we may also decide that there is a genuine reason for us to disclose your personal information to legal authorities and that a disclosure would be justified and lawful under the Act.

Your personal information may be passed to other Move with Us group companies which, like Move with Us, are based in the UK. We would pass your personal information to other group companies to permit them to provide services which relate to you or to send you direct marketing about their own products and/or services (but only when you provide the appropriate consents to permit this – please refer to the section “Direct Marketing” below).

In addition, there may be circumstances in which it is necessary for us to disclose your personal information to external companies or organisations in order to protect our customers or our own legitimate interests. Such disclosures would be permitted under the Act provided they were necessary to safeguard those interests and were proportionate bearing in mind your interests.

Security of Data

Move with Us have physical and electronic processes in place to protect the personal and special category data provided to us. This is controlled through a set of policies and procedures based on the ISO27001. Access to the data is protected by a strong password and there is limited access as defined in our Access Control policy. All employees are required to sign a declaration of confidentiality.

In order to prevent unauthorised access or disclosure, damage or loss to/of (as appropriate) your personal information, we implement suitable physical and electronic, organisational and technical security measures in accordance with our obligations under the Act. This may include encryption (for example, credit/debit card details are encrypted on the Move with Us IT system).

Data transfer outside of the EEA

Data supplied to Move with Us for the purposes of our services is stored in data centres currently hosted within the EEA.

Retaining personal information

Move with Us will ensure personal information is not kept longer than necessary for the relevant purpose(s) by us or by any third parties which process it on our behalf. Where personal information which we hold is known to be unreliable, irrelevant, or excessive, we will securely delete it as soon as possible.

This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Without prejudice to other obligations set out in this contract or legal obligations, we will usually delete personal data falling within the categories set out below at the date/time set out below:

- Personal & sensitive data
- When you ask us to erase your data compliant with GDPR Article 17

Notwithstanding the other provisions of this policy, we will retain documents & records containing personal data:

- To the extent that we are required to do so by law
- If we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk)

Updating and obtaining access to or copies of your personal information

You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- There is no payment required; and
- The supply of appropriate evidence of your identity for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address
- We may withhold personal information that you request to the extent permitted by law
- You may instruct us at any time not to process your personal information as permitted by law
- You can instruct us to erase your data, compliant to GDPR Article 17
- You have the right to lodge a complaint with the Data Protection Authority, if you consider your rights have been breached in anyway

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by contacting Compliance@movewithus.co.uk

Note: The UK Data Protection Authority can be contacted on the following link:
<https://ico.org.uk/global/contact-us/>

If any of your personal information which we hold becomes out of date or inaccurate, please let us know by contacting us by email or by post. You would need to put your request in writing. We will amend your personal information if we believe it contains factual errors or is out of date.

If you wish to obtain access to or copies of the personal information which we hold about you, please contact us in the same way.

Updates to Policy

We may change this privacy policy from time to time by updating this page. You should review this page regularly. If your personal information was provided to us by other means, and you are not happy with any changes to this privacy policy you should tell us by using our contact details below if you do not agree with it being used in accordance with this privacy policy.