

# Privacy Policy

Flint Ross Moorhouse Ltd is committed to keeping your personal data safe and secure from unauthorised access to or unauthorised alterations, disclosure or destruction of information that we hold.

Our security measures include: -

- encryption of our services and data
- review our information collection, storage and processing practices, including physical security measures
- restrict access to personal information of Flint Ross Moorhouse Ltd employees, contractors and agents who need to know that information in order to process it for us and who are subject to contractual confidentiality and processing obligations. They may be disciplined or their contract terminated if they fail to meet these obligations; and
- internal policies setting out our data security approach and training for employees

You have other rights under data protection law that you can exercise against Flint Ross Moorhouse Ltd, but these do not apply in all circumstances. You can exercise those rights free of charge except in very limited circumstances, which will be explained to you if relevant.

For more information about all these rights and how to exercise them against Flint Ross Moorhouse Ltd, please contact us at [surveys@flintross.co.uk](mailto:surveys@flintross.co.uk) and we will be able to tell you more.

Here are short descriptions of your rights:

**Right of access** – you have a right to request access to your personal data, to obtain confirmation that it is being processed and to obtain certain prescribed information about how it is processed.

**Right of rectification (correction)** – in certain circumstances you have a right to ask for your personal data to be corrected if it is inaccurate, and completed if it is incomplete. Where your personal data in question has been disclosed to organisations, they must be informed of the rectification if possible

**Right to be forgotten** – in certain circumstances, you can ask to have your personal data erased. It is unlikely to be possible to accept your request if, for example, Flint Ross Moorhouse Ltd has a legal duty or employment law supersedes, to retain or process your information

**Right to restriction of processing** – if certain conditions apply, you have a right to restrict the processing of your information. This includes when you contest it as being inaccurate (until the accuracy is proved); if you have objected to the processing (when it was necessary for legitimate interests) and Flint Ross Moorhouse Ltd is considering whether its legitimate interests override your own; if you consider that the processing is unlawful (and if this is true) so that you can oppose erasure and request restriction instead; or if Flint Ross Moorhouse Ltd no longer need the personal data for the purposes they held it but you require one or both of them to continue to hold it to establish, make or defend legal claims

**Right of portability** – in certain circumstances, you have the right to move, copy or transfer your personal data to another organisation or to yourself. This right is only relevant if personal data is being processed based on a consent (or for performance of a contract) **and** is done automatically. This right is different from the right of access and the types of information you can get under the two separate rights may be different. Using the data portability right, you cannot get all the personal data you can get using the right of access.

**Right to object** – in certain circumstances, you have the right to object to certain types of processing of your personal data when it is based on legitimate interests, when it is processed for direct marketing (including profiling relevant to direct marketing) or when it is processed for the purposes of statistics. Your rights to object may be relevant if you wish to find out more about what legitimate interests Flint Ross Moorhouse Ltd rely on (as are listed in their respective parts of this privacy notice). Please note that Flint Ross Moorhouse Ltd does not do direct marketing.

**Automated decision making** – Flint Ross Moorhouse Ltd does not make automated decisions nor do we profile your data for marketing and communication purposes. Flint Ross Moorhouse Ltd does not do any automated decision-making that would produce legal or other significant effects on you. You can also withdraw consent if you have provided it and if this is being relied on as the legal basis for using your personal data – as previously described.

### **How we use Personal Information**

We use Personal Information to do some or all of the following:

- Communicate with you as part of our business; Our prime and only usage of your data is for the purposes of carrying out our contract
- Send you important information regarding changes to our policies, other terms and conditions and other administrative information
- Manage our infrastructure and business operations and comply with internal policies and procedures, including those relating to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; business continuity; and records, document and print management
- Resolve complaints and handle requests for data access or correction
- Comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering and anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities (including those outside your country of residence)
- Establish and defend legal rights; protect our operations, our rights, privacy, safety or property, and pursue available remedies or limit our damages

### **How long we hold your data for**

Data held in conjunction with the completion of a contract is held for a minimum of 7 years in order to comply with financial, government and RICS regulations.

### **How we store your data**

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|-----------------------|--|
| Server –              | All data is stored in a secure server with restricted access.  |
| Hard copies of data – | Stored in lockable cabinets both on-site and in on off-site storage facility. Hard copies are kept for a minimum of 7 years. |
| Portable devices –    | Temporary storage of data, utilised when off site.   |

### **How we delete data**

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| Server – | Expired data is archived. |
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Hard copies – Data is removed and destroyed by a registered confidential waste company.

Portable devices – To be responsibly deleted by all Flint Ross Moorhouse Ltd staff on a regular basis.

Responsible person for data protection – Oliver Moorhouse (Managing Director)

### **Changes to Privacy Policy**

We review this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements.