

December 2021

**CASTLEHILL ESTATE AGENTS LIMITED  
PRIVACY POLICY & GDPR COMPLIANCE**

*(From here on, Castlehill Estate Agents Limited will be referred to as Castlehill)*

Castlehill are committed to maintaining the trust and confidence of our clients and the visitors to our website. In particular, we want you to know that Castlehill does not sell, rent or trade email lists with other companies and businesses for marketing purposes. This is our Privacy Policy, we have provided lots of detailed information on when and why we collect your personal information, how we use it, the limited conditions which we may disclose it to others and how we keep it secure.

**Mailing lists**

As part of our registration process you may want to opt in for our weekly property updates. You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails.

**Accessing your personal information**

You are entitled to view, amend, port or delete the personal information that we hold about you. You also have the right to be forgotten. Email your request to [enquiries@castlehill.co.uk](mailto:enquiries@castlehill.co.uk).

Please be aware that if you exercise your right to be forgotten, we do have to maintain certain records in order to fulfil our legal obligations for any defence against Consumer Protection Regulations or the Anti-Money Laundering Act.

**Changing the way we contact you**

If you would like to amend our methods of contact with you, you can do this at any time by contacting the office.

**How we store clients' data and who we share it with**

We store all of our clients' data on a cloud based software system called Expert Agent which we have a license to use. The data that we collect is owned by Castlehill. We do not sell your data to third parties but in order to provide certain services we may need to share your personal data with our service partners. In these instances, we will always ask for your consent.

If required for legal reasons we may also share your data with law enforcement agencies, courts/tribunals and government bodies. We would need to do this to comply with our legal obligations, to exercise our legal rights for the protection of our employees and customers and for the prevention, detection, investigation of crime or prosecution of offenders.

**How do we securely store your data?**

Whether it is personal data, or data which is deemed as a special category, all data is stored on encrypted Expert Agent computer servers. The Expert Agent data storage system abides by the GDPR Policy and is password protected by all of our users. Expert Agent's Privacy Policy can be found here: <http://www.expertagent.co.uk/privacy-cookies/>

In line with GDPR, the Expert Agent system allows us to maintain a record of processing activities. Any paper copies of personal or special category data is shredded at our premises if no longer needed. Where it is necessary to store paper copies of data these records are kept secure and locked away out of sight.

### **Legitimate reasons for processing client data**

The processing of any clients' data is necessary for the legitimate interests of Castlehill, including:

- Supplying and selling services to our clients.
- Sending promotional communications and contacting our clients about services which are relevant.
- Complying with our legal and regulatory obligations.
- Preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies.
- Handling client contacts, queries, complaints or disputes.

### **How long do we store data and why?**

We do not store your data for any length of time further than the time which is necessary to service you as a client. Where we must store clients' data in line with other legal compliance obligations, we will only use it as needed to fulfil our legal obligations or to service your needs as a client. For example, under Anti-Money Laundering obligations we must store identification documents for any person we do business with for five years. Equally, we must store data for seven years to comply with Consumer Protection Regulations.

### **What do we use it for?**

We will use your data to contact you to service your needs as a client. We will contact you by the methods that you have opted in for. We may contact you about relevant products and services based on our knowledge of our average clients' needs.

We will obtain your consent to be contacted at our first point of contact with you.

### **Data security breaches**

We treat security of our clients' data as a serious matter. All data will be stored as described above. If there is a data security high level breach which is likely to result in a risk to our clients, this breach will be notified to the ICO within 72 hours and all parties effected will be contacted.

### **How we obtain consent**

Upon contacting Castlehill, clients will be asked for their consent to be contacted. There will be a choice of contact options; consent can be amended or withdrawn at any time as detailed above.