

**1) General**

- a. Hardcastle Rural Surveyors Ltd ('HRS Ltd') provides property and surveying services (Services) to clients and customers (Clients) and is registered under company number 13240378 and whose registered address is The Manse, Main Street, Kirkby Malzeard, Ripon, N Yorkshire HG4 3RS. HRS Ltd operates the website [www.hardcasterlural.co.uk](http://www.hardcasterlural.co.uk). This document may refer to HRS Ltd as 'We', 'Us' or 'Our'.
- b. HRS Ltd is committed to protecting your personal information and data, this policy sets out the data we collect and how we use and store this data.
- c. Data is regularly held in relation to clients and customers (Clients), applicants searching for properties (Applicants), employees of HRS Ltd (Employees) and business & marketing contacts of the firm (Business Contacts). This document may refer to the aforementioned as 'You' or 'Your'.

**2) Data we Gather**

- a. HRS Ltd collects data in connections with its operational business providing property and surveying services.
- b. Data is stored on electronic and paper files, internal databases and backup systems operated by HRS Ltd.
- c. Directors, employees, consultants and professional advisers to HRS Ltd have access to the data.
- d. Alterations to data held may be made by Directors, employees or consultants of HRS Ltd.
- e. The Data we regularly hold comprises:
  - i. Name
  - ii. Home address
  - iii. Work address
  - iv. Phone numbers (home, work and mobile)
  - v. Email (personal and work)
  - vi. Professional qualifications and job title
- f. Additional data we may gather from Clients
  - i. Title Deeds
  - ii. Tenancy agreements and memorandums
  - iii. Options and Promotion agreements
  - iv. Companies House information
  - v. Financial information relating to the Service provided
  - vi. Bank account details
  - vii. Information to enable HRS Ltd to undertake financial reference or credit checks
  - viii. Information to enable HRS Ltd to undertake identification checks (e.g. date of birth, passports, drivers licence, utilities bills, companies house information)
  - ix. National Insurance numbers
  - x. Medical information
  - xi. Such other information as is required to provide the Service to the Client
- g. Additional data we may gather from Applicants:
  - i. Information to enable HRS Ltd to undertake financial reference or credit checks
  - ii. Information to enable HRS Ltd to undertake identification checks (e.g. date of birth, passports, drivers licence, utilities bills)
  - iii. Information on Your source of funding, mortgage and financial details and buying position
  - iv. Information on Your search criteria
- h. Additional information we may collect from Business Contacts
  - i. Information on your online presence
- i. Additional information we may collect from Employees
  - i. Details of your qualifications and previous employment
  - ii. Bank account details
  - iii. National Insurance numbers
  - iv. Medical information
  - v. Such other information as we may require to comply with employment law.

**3) Where we collect Data from**

- a. HRS Ltd collects data from the following sources:
  - i. Information provided by the Client, Applicant, Employee or Business Contact, whether verbal, in hard copy or electronic format
  - ii. Post, email, fax and other correspondence with HRS Ltd
  - iii. Communications in person, on the phone or via video call with HRS Ltd
  - iv. Publicly available sources such as HM Land Registry, Companies House, BT Phone Book, Rural Payments
  - v. HRS Ltd website or social media sites and messaging services
  - vi. Site inspections and meetings
  - vii. Your financial, legal and business advisers
  - viii. Your bank or financial institute
  - ix. Credit and identification reference agencies

**4) Where we use our Data**

- a. HRS Ltd may use the Data for the following purposes
  - i. To provide the Service to the Client
  - ii. To help the Applicant in their property search
  - iii. To administer the running of HRS Ltd business in an efficient manner
  - iv. To comply with regulatory and legal requirements
  - v. To maintain relevant contact with Clients, Applicants, Employees and Business Contacts
  - vi. To send marketing information to Clients, Applicants, Employees and Business Contacts
  - vii. To maintain the accuracy of information held by HRS Ltd
  - viii. To share the data with HMRC or such other body as required by regulatory or legal requirement.

**5) On what basis do we hold and process your data**

- a. Under the General Data Protection Regulations, Article 6 provides the legal basis for processing data where a contract is in place, in the case of Employees this contract is the Contract of Employment.

- b. In other instances HRS Ltd may rely upon 'legitimate interest', 'legal obligation' or 'consent' as the lawful basis for processing data.
- c. Legitimate Interest is when HRS Ltd have a business or commercial reason to process or use your data, unless this is superseded by your rights. Below is a summary of how HRS Ltd may process or use your data and our legal basis and reason for this action.

How HRS Ltd process and use your data	Our reasons and legal basis
Providing our property and surveying Services	To provide our Service to the Client in accordance with our Agreement and Terms of Business or on your request before entering into an Agreement for Services. For our legitimate interest or those of a third party.
Ensuring up-to-date Client, Applicant, Employee and Business Contact records are maintained	To provide our Services to the Client in accordance with our Agreement and Terms of Business. To provide relevant information to Applicants based on their request and search criteria. To provide relevant information to Employees based on their Contract of Employment To provide information to key Business Contacts to allow efficient communication on HRS Ltd's services and to aid in the provision of Services to Clients To comply with legal and regulatory requirements For legitimate interests or those of third parties such as ensuring we can contact Clients, Applicants, Employees and Business Contacts about existing and new services
Conducting credit and identification checks and such other processing as is required to comply with legal and regulatory requirements	To comply with our legal and regulatory requirements. For our legitimate interest or those of a third party, such as ensuring an applicant can afford to pay their rent for properties offered to let through us
Ensuring confidentiality of sensitive information	To comply with our legal and regulatory requirements. For our legitimate interest or those of a third party.
Complying with HRS Ltd internal policies and procedures and to improve business efficiencies	To comply with our legal and regulatory requirements. For our legitimate interest or those of a third party.
Providing information required by legal, regulatory and audit bodies and completing Statutory returns	To comply with our legal and regulatory requirements. For our legitimate interest or those of a third party.
Analysing data to improve business performance and efficiency	For legitimate interests or those of third parties such as ensuring we provide the best Service we can to our Clients at a fair price
Ensuring security of our systems and data	For legitimate interests or those of third parties such as preventing and detecting criminal activity that could be damaging to HRS Ltd and You. To comply with legal and regulatory requirements.
Ensuring safe working practices	To comply with legal and regulatory requirements. For legitimate interests or those of third parties such as ensuring we provide the best Service we can to our Clients at a fair price
Marketing our Services	For legitimate interests of HRS Ltd in conducting our business. We will often seek to obtain your consent in order to contact you however initially we may rely upon our legitimate interest. You will be given the option to unsubscribe or opt out of marketing newsletters.
For internal and external audit and quality checks	For legitimate interests or those of third parties such as ensuring we provide the best Service we can to our Clients at a fair price

6) **How long your Data is retained**

- a. Your data will be retained by HRS Ltd for as long and we deem necessary for the purpose of processing your data in accordance with 5) above, and for a minimum of 6 years. We will retain such data as is reasonably required for the conduct of our business.
- b. Legal and Regulatory requirements may require the retention of data for a longer period in which case this will over-ride 6) a. above.

7) **Access to our Data**

- a. All Directors of HRS Ltd, authorised staff, administrators and professional advisors will have access to the Data.
- b. From time to time HRS Ltd may outsource some of our services to reputable third parties. All third parties will be required to comply strictly to our data security policies and current data protection laws.
- c. Strict security measures are in place to ensure data held by HRS Ltd is secure and to prevent unauthorised access, modification or misuse.

8) **Updating your details**

- a. If your details change we request that you contact our office to notify us as soon as possible. Failure to notify us of changes in your data may mean we are unable to provide you the Service you require or contact you to discuss your Agreement.
- b. Requests to update your data should be made in writing to our registered address. We will endeavour to amend your data and inform all third parties who rely on this as soon as practical.

9) **Your Data & Your Rights**

- a. You have the right to request a copy of the personal data we hold about you. In order to release such data we require proof of identification in the form of 2 approved identification documents. All requests for such data should be submitted in writing to our registered office, we will endeavour to respond within 1 month of receipt your written request and confirmed ID. Most requests are free unless they are made on unreasonable terms, manifestly unfounded, repetitive or excessive in which case HRS Ltd reserve the right to make an appropriate charge.
- b. You have the right to notify us of inaccuracies on your data and request that we update our records, please make requests in writing to our registered office, upon receipt of which we will update our records.
- c. You may request that we delete your personal data so that it is removed from our records.
- d. You may request that the data we hold on you is transferred to another organisation.
- e. You may object to automated processing or profiling of your data.
- f. You may object to certain processing activities such as direct marketing.

10) **Complaints**

- a. If you have any queries or questions in relation to this policy please enquire in writing to our registered office.
- b. In you are unsatisfied with our storage, handling and processing of your data or anything we have done or not done, please inform us in writing.
- c. All complaints or enquiries will be investigated and responded to as deemed appropriate by HRS Ltd.
- d. All complaints should be sent to the Director at the registered business address.

11) **Review & Amendment**

- a. This Policy was produced and reviewed by HRS Ltd on 16<sup>th</sup> May 2021.
- b. HRS Ltd reserve the right to review and amend this policy at anytime without notice. The current policy will be displayed on our website.