

STIRLING & MAIR LIMITED
PRIVACY NOTICE

WHO WE ARE

Stirling & Mair Limited is a limited company registered in Scotland, registration number SC261547, having our registered office at 28 High Street, Johnstone, Renfrewshire, PA5 8AH. This Privacy Notice explains how we collect and use personal information about you. Stirling & Mair Limited will be a "controller" of the personal information that you provide to us when you instruct us to act on your behalf unless otherwise stated in this Privacy Notice. A controller determines the purposes and means of processing personal data.

WHAT PERSONAL INFORMATION WE COLLECT

We may collect the following information about you: name; date of birth; relationship status; gender; profession, employer and job title; contact information including email address and telephone numbers; demographic information such as your address, postcode, preferences and interests; financial data, including your financial position, status and history, including bank details and credit rating; other information relevant to customer surveys and/or offers; ID information, including passport and driving licence details; Information about how you use our website, products and services; Details about payments to and from you and other details about services you purchase from us; Information obtained by providing our services to you; and what we learn about you from letters, emails and conversations between us.

WHERE WE COLLECT PERSONAL INFORMATION FROM

Directly from you; Organisations or other businesses that introduce you to us, such as referrals from other professional advisors and financial institutions; Credit reference agencies and fraud prevention agencies; Publicly available resources, such as Companies House and Registers of Scotland; The internet and social networking sites such as LinkedIn; Title and search agents; Intermediaries with whom you are also a client; Solicitors, intermediaries, expert witnesses, courts, adjudicators, arbiters and others that we engage (or have engaged us) in connection with the products and services that we provide to you; and Information we gathered via events.

HOW WE USE YOUR PERSONAL INFORMATION

WHAT WE USE YOUR INFORMATION FOR	OUR REASONS	OUR LEGITIMATE INTERESTS
Allow us to deliver the professional services that we have agreed to provide	Performance of a contract Legitimate interest	To meet our contractual obligations to our clients and other third parties with whom we contract/have a relationship
Check for conflict of interest in the provision of our service	Performance of a contract Legitimate interest	To ensure we avoid conflicts of interest when providing services to clients
Provide you with a quote for our services	Legitimate interest	To engage you as a client and allow us to provide you with our services
Maintain records	Legal obligation	
Communication by post, email or telephone	Performance of a contract Legitimate interest	To communicate with you in the ordinary course of our business and to provide our services
Assist with queries you may have raised, staff members, partners or affiliates	Performance of a contract	
Manage claims or complaints relating the services we have provided	Performance of a contract Legitimate interest	To manage complaints and claims efficiently and to protect our business

Facilitate internal and external auditing purposes	Performance of a contract Legal obligation Legitimate interest	To assist with the management of our business and to ensure compliance with applicable regulations
Process financial transactions	Legal obligation	
Verify identity where this is required	Legal obligation Legitimate interest	To confirm the validity of any contract that is or will be drawn up between us to comply with applicable Anti-Money Laundering Regulations.
Understand your needs and how they may be met	Legitimate interest	To provide, or offer to provide, relevant services to you
Prevent and detect crime, fraud or corruption	Legal obligation	
Run our business in an efficient and proper way. This includes managing financial administration, business capability, planning, communications, corporate governance and audit	Performance of a contract Legal obligation Legitimate interest	To achieve operational efficiencies
For corporate activity, such as a sale, transfer, merger or re-organisation of our business	Performance of a contract Legitimate interest	To ensure that any corporate activity is appraised accurately To manage our business efficiently in accordance with normal business practices and otherwise optimise and realise the value of our business for its owners
For public safety,	Legitimate interest	To assist, where possible, in the promotion of public safety
For marketing and business development activities, including seeking new business, promoting our business and events management	Legitimate interest	To allow us to expand our business
Improve our services	Legitimate Interest	To retain or improve our business's competitiveness
Analyse cookie and website usage data to keep improving our website and search functionality	Legitimate interest	To keep our website relevant and of interest to existing and potential customers
Allow us to customise the content of marketing material which is presented to you based on your likely interests	Legitimate interest	To market products and services to you that we believe will be of interest to you
Comply with applicable laws where we are obliged to retain and/or disclose certain information	Legal obligation	
Contact you for market research purposes. We may contact you by email, phone, fax or mail.	Legitimate interest	To assess the potential to provide new products and services to you that we believe will be of interest to you

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

At times it is necessary for us to share your information with third parties. We only share your information with third parties who we are satisfied will handle your data securely and appropriately.

For the provision of professional services we will share data with: Regulators and statutory bodies (such as The Royal Institution of Chartered Surveyors, Her Majesties Revenue and Customs, The Financial Conduct Authority and The

information Commissioner's Office); The Scottish Courts; Solicitors and other legal professionals acting for another party or parties relative to the matter(s) we are dealing with on your behalf; Other solicitors who are instructed by us to act on your behalf at court (known as "local agents"); Software providers who facilitate the operation of our systems (such as LawWare Ltd); Estate agents who you have instructed to sell a property for you or through whom the Seller of a property you may purchase is selling a property; Banks and Building Societies being the lender to whom you have instructed us to provide survey information; Debt recovery service providers (other solicitors, Sheriff's officers, Debt recovery agencies, Tracing agents); Card payment providers (such as Worldpay (UK) Ltd, Secure Trading Ltd); Anti-money laundering service providers; The police and other law enforcement agencies; Public information resources, such as Companies House, The Accountant in Bankruptcy and Registers of Scotland; Credit reference agencies and fraud prevention agencies; Counterparties to any transaction; Other professional advisors and agents engaged by you; Other companies owned or jointly owned by Stirling & Mair Limited; Other partnerships in which Stirling & Mair Limited is a partner; and Potential or actual purchasers of any part of our business or assets, or other third parties in the context of a possible transfer or restructuring of our business.

In the event that we do share personal data with external third parties, we will only share such personal data strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal data in accordance with those purposes.

HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

We will retain client files (and your personal information within them) for as long as required by law and for legal claims purposes. For professional services we retain client files in accordance with guidance from the Law Society of Scotland, which varies dependent on the type of work we have undertaken for you. The rules that apply to determine how long it is appropriate to hold records for particular matters can be complex and varied. If you wish to know how long we may hold your particular personal information as a record of a particular matter then please e-mail info@stirlingandmair.com.

INTERNATIONAL TRANSFERS

We hold all personal information concerning our clients and their affairs within the United Kingdom.

We will only send your personal information outside the European Economic Area: where you ask us to; where we are being instructed on your behalf by someone outside the European Economic Area (for example, another professional firm); where that is required to provide the services that you have instructed us to provide – for example, in instructing/dealing with foreign advisors on your behalf ; where we need to do so in order to comply with a legal duty incumbent on us or you ; where the transfer is necessary for important reasons of public interest; and the transfer is necessary for the establishment, exercise or defence of legal claims.

If your information is to be processed outside the EEA, then we will ensure that it is protected to the same standards as if it were being processed within the EEA by using appropriate safeguards, which may include: ensuring that your information is only transferred to countries that have been recognised by the EU as adequate protecting personal information to the same standards as the EU; and putting in place a contract with the recipient of your information which requires them to protect that information to the same standards as if the information were being processed within the EEA

The safeguards we use will depend on the location of the recipient, the function they are performing and the personal information being transferred.

IF YOU CHOOSE NOT TO GIVE YOUR PERSONAL INFORMATION

Where we need to collect personal information from you to meet our legal obligations – for example to carry out anti-money laundering checks – or under the terms of a contract we have with you and you fail to provide that data when requested, it may delay or prevent us from being able to perform the contract we have entered into with you and/or comply with our own legal obligations. In some cases, we may be unable to act for you or may have to withdraw from acting.

YOUR RIGHTS:

Access to your information – You have the right to request a copy of the personal information about you that we hold.

Correcting your information – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained; We are using that information with your consent and you have withdrawn your consent – see Withdrawing consent to using your

information below; You have validly objected to our use of your personal information – see Objecting to how we may use your information below; and Our use of your personal information is contrary to law or our other legal obligations.

Objecting to how we may use your information – You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Restricting how we may use your information – In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right to validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Transfer – if we process personal information that you provide to us on the basis of consent or because it is necessary for the performance of a contract to which you are party, and in either case that processing is carried out by automated means, then you have the right to have that personal information transmitted to you in a machine readable format. Where technically feasible, you also have the right to have that personal information transmitted directly to another controller.

Withdrawing consent using your information – Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us if you wish to exercise any of these rights.

CHANGES TO OUR PRIVACY NOTICE

We keep this Privacy Notice under regular review. Paper copies of the Privacy Notice may also be obtained from Stirling & Mair Limited, 28 High Street, Johnstone PA 5 8AH. This Privacy Notice was last updated on 11th September 2018.

CONTACT INFORMATION AND FURTHER ADVICE

If you have any questions that are not covered in this Privacy Notice please contact us at: info@stirlingmair.com or by writing to Privacy Officer, Stirling & Mair Limited, 28 High Street, Johnstone PA 5 8AH.

COMPLAINTS

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office, whose contact details are as follows:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone – 0303 123 1113 / Website – <https://ico.org.uk/>