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## **Governing Law:**

The user confirms that the terms and conditions and use of this website shall be governed by the laws of England and Wales and that any and all disputes arising therefrom shall be subject to the exclusive jurisdiction of the English courts.

## **Privacy Policy:**

Aldersley London Ltd are committed to ensuring that your privacy is protected. This privacy notice, together with our Terms and Conditions and any other notice referred to in it, explains how we will collect your personal data and how we use your personal data when you visit our website.

Aldersley London Ltd is a data controller in respect of the personal data processed when you visit our website. If you have any questions or concerns in relation to this Privacy Notice you can contact our Data Protection Officer at [info@aldersleylondon.com](mailto:info@aldersleylondon.com) or by writing to the Data Protection Officer, Aldersley London Ltd, 97 Park Lane, Mayfair, London, W1K 7TG.

This website is not intended for children. This privacy notice was last amended in June 2022. It supersedes any earlier version.

This website may include links to third party websites, plug-ins or applications which may allow third parties to collect or share your personal data. We are not responsible for their use of your personal data and cannot control it.

## **1. What information we may collect and how we use it:**

As a business we collect, use, store and transfer different types of personal data depending on who you are. If you are purchasing or selling a property through Aldersley London Ltd or purchasing or selling a property from one of our clients, we collect and use your personal data in order for us to provide you with our services. The personal data we collect and use may include:

- Identity Data (name, marital status, title, date of birth, gender, username and password, purchases made by you, your interests and preferences, feedback and survey responses)
- Contact Data (billing address, delivery address, email address and telephone numbers)
- Financial Data (bank account information, payment details)
- Transaction Data (details about payments to and from you and other services you have purchased through us)
  
- Technical Data (internet protocol address, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, identification number, online identified, location data and other similar identifying information required for the customer's device(s) to communicate with websites and applications on the internet)
- Usage Data (how you use our website products and services, the full uniform resource locator's clickstream to, through and from our site (including date and time), download errors, lengths of visit to certain pages, page interaction information, methods to browse away from the page and any phone numbers you use to call us)
- Marketing and Communications Data (your marketing preferences from us and our third parties and your communication preferences)

We may also collect and use aggregate data, for example when you visit our website we may aggregate data about your usage to tell us about how certain features on our website are used. This is not usually classified as personal data as whilst it derives from personal data (in the example, it is derived from your usage data) it does not reveal your identity to us. If we do link this aggregated data to your personal information, it will be treated as personal data in line with this policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can ask us to rectify or update your personal information at any time by email to [info@aldersleylondon.com](mailto:info@aldersleylondon.com) or by writing to The Data Protection Officer, Aldersley London Ltd, 97 Park Lane, Mayfair, London, W1K 7TG.

## **2. How your personal data is collected:**

We use different methods to collect data from and about you including:

**Direct interactions** -You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Apply for our services;
- Subscribe to our service or publications;
- Request marketing to be sent to you;
- Contact us through social media such as but not limited to (Instagram, LinkedIn)
- Walk-in to our office or telephone us
- Providing us with feedback.

**Third parties or publicly available source** - We may receive personal data about you from various third parties and public sources as set out below: Contact, Financial and Transaction Data from providers of payment services such as Mastercard based inside the EU. Identity and Contact Data from data brokers or aggregators such as:

- Rightmove based inside the EU
- Zoopla Property Group based inside the EU
- Facebook based outside the EU
- Instagram based outside the EU
- SmartCredit Limited based inside the EU
- SmartSearch BV based inside the EU
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### 3. How we use your personal data:

In the table below we summarise the ways that we plan to use your personal data and the purposes for which we will use your personal data. We will only use your personal data for the purposes for which we have collected it. If we need to process your personal data for a different purpose that is not compatible with the original purpose that we collected your personal data, we will let you know. We may process your personal data for a different purpose and without your consent where it is necessary for us to comply with our legal obligations.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To contact you	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (for running our business, to recover debts due to us, to keep our records updated and to study how customers use our products/services)
To carry out our obligations arising from any contracts entered between you and us and to provide with you the information, products, and services you request from us Identity	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (for running our business and to recover debts due to us)
To provide you with information about other goods and services that we offer which we feel may interest you Identity	Contact Technical Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)
To permit selected third parties:  <ul style="list-style-type: none"> <li>• to provide you with information about goods or services which we feel may interest you</li> <li>• to assist us in the improvement and optimisation of advertising, marketing material and content, our services and the website</li> </ul>	Identity Contact Technical Usage	Consent (in relation to SMS and email marketing communications)  Necessary for our legitimate interests (to develop our service offering)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To assist us in the improvement and optimisation of advertising, marketing material and content, our services and the website	Identity Contact Financial Transaction  Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business and provision of administration and IT services)
To notify you about changes to our service	Identity Contact	Performance of a contract with you  Necessary to comply with our legal obligations

		Necessary for our legitimate interests (to keep our records updated)
To ensure that content from our website is presented in the most effective manner for you and your computer	Identity Contact Financial Transaction	Necessary for our legitimate interests (to develop our products/services and grow our business and provision of administration and IT services)
To verify your identity	Identity Contact Financial Transaction	Necessary to comply with our legal obligations Necessary for our legitimate interests (for running our business and to prevent fraud and money laundering)
As part of our efforts to keep our site safe and secure and to prevent or detect fraud	Identity Contact Financial Transaction	Necessary to comply with our legal obligations Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide customer support	Identity Contact	Performance of a contract with you
To facilitate and to enable you to partake in a property viewing, open house event or visits to property marketing suites	Identity Contact	Performance of a contract with you Necessary for our legitimate interests (for running our business and to develop and grow our business)
To comply with the requirements imposed by law or any court order	Identity Contact Technical Usage	Necessary to comply with our legal obligations
Where you have viewed through us, we may disclose your name to a landlord or vendor where we have been dis-instructed, in order to avoid a potential commission dispute	Your name	Necessary for our legitimate interests (to protect our entitlement to a commission and to avoid commission disputes wherever possible)
We may disclose tenant references and any forwarding address to a landlord	Identity Contact	Necessary for our legitimate interests (to help protect our landlord customers' legal rights)

**Marketing** - You have the right to withdraw your consent for us to use your personal data for marketing purposes at any time. You also have the right to withdraw consent for us to pass your information to third parties for marketing purposes. If you do withdraw your consent, this will result in us ceasing to market goods and services to you.

You can ask us to stop sending you marketing messages at any time by contacting us at any time by emailing [info@aldersleylondon.com](mailto:info@aldersleylondon.com) or by calling 0207 659 4425.

If you do withdraw your consent to receiving marketing messages, we will still process your personal data in order to fulfil our contract with you and in accordance with our legal, accountancy and regulatory obligations. If you no longer wish to be contacted by third parties for marketing purposes, please follow the instructions in their marketing communications, or consult their privacy policies about how to unsubscribe.

**Third-party marketing** - We will get your express opt-in consent before we share your personal data with any company outside the Aldersley London Ltd brand for marketing purposes.

**Cookies** - The Aldersley London Ltd website and applications may automatically collect data about how you use our services in order to help us improve future functionality of our website and to assist with advertising and targeting. We use Google Analytics, which is a web analysis service provided by Google.

The cookies on the Aldersley London Ltd website do not track, collect or upload data such as your name, email address or billing information, but it may collect data about your equipment and browsing activities. We may collect and report on the adoption and usage of specific features, crashes and exceptions and other useful, anonymous metrics.

Certain devices can detect your approximate location, via latitude and longitude. The accuracy of this data is not in the control of Aldersley London Ltd. If this feature is requested, Aldersley London Ltd will prompt you to provide your permission to access your location data for the purposes of providing you with results or directions based on your current location. You can disable location settings within your browser or app.

## 4. Disclosures of your personal data:

We may have to share your personal data with the parties set out below for the purposes set out in the "Purposes for which we will use your personal data" table above. We have agreements in place with our third parties that restrict their use of your personal data. We only allow third parties to use your personal data for specified purposes and in accordance with our instructions, see table below:

Category	Explanation
Related Third Parties	Mortgage Brokers (where you have consented for us to do so).
External Third Parties	Service providers acting as processors based in the United Kingdom who provide IT and system administration services, anti-money laundering service providers (such as SmartSearch) and services to enable us to perform our contract with you.
	Property developers acting as Processors or independent controllers based in the UK who process your personal data in order to arrange and facilitate your visit to their marketing suite.
	Advertisers and advertising networks (including social media) that require the data to select and serve relevant adverts to you.
	Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accountancy services.
	HMRC, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances. We will refer your personal information to third parties, but only where you have consented for us to do so.

Category	Explanation
Other Third Parties	Sometimes there may be third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.



**Anti-money Laundering** - Aldersley London Ltd is committed to operating its business in a transparent and open manner consistent with our legal and regulatory obligations. We are aware that the real estate industry is a target for organised criminals seeking to launder the proceeds of criminal activity. We always seek to prevent this activity by cooperating fully with the authorities and reporting suspicious activity to the National Crime Agency.

As part of this commitment, we adopt a strict compliance of all Anti-Money Laundering rules, with specific emphasis on the Proceeds of Crime Act 2002, the Money Laundering Regulations 2017, the Bribery Act 2010 and the Terrorism Act 2000.

Aldersley London Ltd policy commitment is applicable to all of our customers, including vendors, buyers, landlords and tenants. As a result we obtain and hold for a period of at least seven years evidence pertaining to our customers' identity and, where appropriate, we obtain proof of ownership of property and source/destination of funds. We will be unable to proceed with any work on behalf of our customers if we are unable to obtain this information. Customers' identity will be subject to an electronic identity check, which may also include a credit check.

Aldersley London Ltd is registered and supervised by HM Revenue & Customs for compliance with the Money Laundering Regulations 2017.

## **5. Data Security:**

Once we have received your personal data we will use reasonable and necessary procedures and security features to try and prevent unauthorised access. For example, we limit who can access your personal data to those individuals and third parties who need to know it and who are subject to a duty of confidentiality. If we become aware of a data breach we will notify the Information Commissioner's Office. If we believe that the data breach is serious, we may notify you in accordance with our legal requirements.

## **6. International Transfers:**

We will not transfer your personal data outside of the European Economic Area, except to a country offering the same level of protection for your personal data. For example, with certain service providers we may use specific contracts approved by the European Commission which ensures that your personal data has the same protection as it would have in Europe.

## **7. Data Retention:**

We hold on to your personal data whilst you use our services (or whilst we provide services connected to you) and for at least seven years thereafter, for legal, regulatory and accounting purposes. If we need to hold on to your personal data for longer, we take into consideration the potential risks in continuing to store your data against why we might need to keep it. In some circumstances we might anonymise your personal data so it is not associated with you, and we may then use this information indefinitely.

## **8. Your Legal Rights:**

Under data protection laws you have the right to protect and look after your personal data. You have the right to:

- Ask us for the personal data that we hold and process about you (this is commonly known as a data subject access request). You have rights to the following information:
- The purpose(s) for which we are processing your information;
- The categories of personal information we hold about you
- The recipients or categories of recipient to whom the personal data have been or will be disclosed; or the period for which we will store your information, or the criteria used to determine that period;
- prevent the use of your personal data for marketing purposes by:
- informing a Aldersley London Ltd telephone operator; or  
by ticking the relevant boxes on the data collection forms; or by emailing [info@aldersleylondon.com](mailto:info@aldersleylondon.com)

Please note that even if you refuse marketing, we will still contact you to discuss the services you have asked us to provide to you or to tell you about changes to our terms and conditions:

- ask that any inaccurate information we hold about you is corrected;
- ask that we delete the personal data we hold about you in certain situations;
- ask that we stop using your personal data for certain purposes;
- ask that we do not make decisions about you using completely automated means; and/or
- ask that personal data we hold about you is given to you, or where technically feasible a third party chosen by you, in a commonly used, machine-readable format.

The rights listed above may apply in certain circumstances, and so we may not always be able to comply with your request to exercise these rights. We will usually respond to a request from you to exercise your rights within 1 month of receipt, but it might take longer if your request is particularly complex or if you have made a number of requests. Please be aware that we may need to process your personal data and/or request specific information from you to help us comply with your request. You will not usually have to pay a fee to exercise these rights, but we reserve the right to if your request is clearly unfounded, repetitive, or excessive, alternatively we may refuse to comply with your request.

**Complaints and Feedback** - If you would like to speak to us about how we handle your personal data, please contact our Data Protection Officer in the first instance at [info@aldersleylondon.com](mailto:info@aldersleylondon.com) You can also complain to the Information Commissioner's Office who is the UK supervisory authority for data protection issues.

### **Indemnity:**

You acknowledge that you are solely responsible for the use to which you put this website and all the results and information you obtain from it and that all warranties, conditions, undertakings, representations, and terms whether expressed or implied, statutory, or otherwise are hereby excluded to the fullest extent permitted by law.

Save in respect of liability for death or personal injury arising out of negligence or for fraudulent misrepresentation, we and all contributors to this website hereby disclaim to the fullest extent permitted by law all liability for any loss or damage including any consequential or indirect loss or damage incurred by you, whether arising in tort, contract or otherwise, and arising out of or in relation to or in connection with your access to or use of or inability to use this website.

Whilst we take every care to ensure that the standard of this website remains high and to maintain the continuity of it, we do not accept any ongoing obligation or responsibility to operate this website (or any particular part of it). If any part of our terms and conditions is deemed to be unenforceable (including any provision in which we exclude our liability to you) the enforceability of any other part of these conditions will not be affected. These terms and conditions and your use of this website are governed exclusively by English law. This does not affect your statutory rights as a consumer.

Aldersley London Ltd is registered in England and Wales (registered number 10353674). Our registered office is at 97 Park Lane, Mayfair, London, W1K 7TG.

## **How to contact Aldersley London Ltd:**

We welcome your views about our website and our Privacy Policy. If you would like to contact us with any queries or comments, please send an e-mail to [info@aldersleylondon.com](mailto:info@aldersleylondon.com)