Holkham Estate Lettings – Privacy Policy

This Privacy Policy explains when and why we collect personal information about our website visitors, customers and people who contact or interact with us, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

If you do not want us to process your personal information as described in this Privacy Policy, please do not provide information to Holkham Estate.

How do we collect personal information about you?

We obtain personal information about you that you provide to us through our website, emails, phone conversations, social media channels, documents you provide to us, or when you visit our office, for example when you:

- Enquire about specific properties for rent or for sale
- Register to be added to our mailing list
- Enter into a tenancy agreement for one of our properties
- Interact with us on our social media sites

We also obtain personal information relating to you using automated technical means when you visit our website.

What type of personal information is collected?

The information we collect from you might include (but is not limited to) your name, address, email address, phone number, date of birth and financial details, and any other information you choose to provide to us.

The information we collect through our website using automated technical means includes: the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type, and version, time zone setting, browser plug-in types and versions, operating system and platform, identification number, online identifier, and location data. We also collect information about your website visit including which website pages are accessed, page response times, and length of visits to pages.

How long do we retain your personal information?

We review our retention periods for personal data on a regular basis. We are legally required to hold some types of information for certain prescribed periods to fulfil our statutory obligations. Outside of specific statutory obligations, we will hold your personal data on our systems for as long as is necessary for the relevant purposes for which we use it.

How do we use your personal information?

We may use the information that you directly provide to us in the following ways:

- We may use your name, address, and contact details for the purpose of carrying out our obligations arising from any contracts entered into by you and Holkham Estate. Our legal basis for this use is that it is necessary for the performance of a contract to which you are party.
- We may use your name, email address, and postal address to provide you
 with information, you have requested from us, respond to enquiries or
 requests from you and communicate with you in relation to those enquiries
 or requests. Our legal basis for this use is our legitimate interests, namely
 carrying out activities in the course of *Holkham Estate* business in response
 to customer enquiries or requests.
- We may use your name, email address and postal address to provide you
 with information regarding similar goods and services to those you have
 already enquired about or purchased. Our legal basis for this use is our
 legitimate interests, namely the ongoing marketing of our goods and
 services to individuals with whom we have an existing relationship in
 connection with our goods and services and/or who have expressed an
 interest in those goods and services.
- Where you have entered into a contract with us or we have provided you
 with services, we may use your name, email address, postal address, or
 phone number to ask for your feedback about the services we have
 provided to you. Our legal basis for this use is our legitimate interests,
 namely evaluating and where necessary improving the quality of our service
 provision with a view to promoting the success of our business and
 positive customer relationships.
- Where you are a party to an existing contract with us or regularly enter into contracts with us for our services, we may use your name, email address, postal address or phone number to notify you of changes to the terms and conditions of our services. Our legal basis for this use is our legitimate

interests, namely the administration and management of our business contracts and relationships.

- We may use your name, email address, and postal address to send you
 marketing communications if you have chosen to receive these. These may
 include information about properties for rent or for sale, the current
 property market, promotions, or offers. Our legal basis for this use is
 consent.
- We may use your name, address, personal and contact details to verify your identity for referencing for a tenancy agreement or for money laundering purposes. Our legal basis for this use is compliance with a legal obligation to which we are subject, our legitimate interests, namely ensuring the security of our systems, network, and information and those of third parties.

We may use the information that we automatically collect using technical means through our website to:

- Administer our site, and for troubleshooting, testing, research, and statistical purposes. We use Google Analytics, a third-party website monitoring tool. Our legal basis for this is for monitoring the use of our software and IT systems and improving our website.
- Measure or understand the effectiveness of our own advertising activity. Our legal basis for this use is our legitimate interests, namely improving the relevancy of our advertising. We may use personal data/cookies for personalization of ads including Google, Facebook & Instagram. Read Google's <u>Privacy and policies here</u>. <u>Google's privacy and</u> terms can be found here.
- Measure or understand the effectiveness of our marketing emails. Our legal basis for this use is consent.

This automated collection of information may involve the use of cookies. Please see our <u>Cookies Policy</u> for further detail about these.

We may analyse the personal information we collect directly from you and obtain using automated technical means to create a profile of your interests and preferences so that we can contact you with information relevant to you (if you have chosen to receive marketing communications from us).

We may also use any of your personal information that we collect from you directly where necessary to detect and reduce fraud and credit risk. These sources include NRLA (National Residential Landlords Association) referencing which we use for all referencing purposes. Our legal basis for this use of your

personal information is our legitimate interests in preventing our business being subject to fraud or credit risk. Any records may be stored electronically or as a hard copy.

Who has access to information?

We will not sell or rent your information to third parties.

We may pass your information to third party service providers, including but not limited to:

- Business partners, suppliers, and sub-contractors working on our behalf for the purposes of completing tasks and providing services to you. Any contractor requiring access to your let property in order for them to contact you to carry out essential works or maintenance.
- NRLA(National Residential Landlords Association) referencing for credit checks
- Landmark property management system for management of tenant & property data
- Deposit Protection Service (DPS) for secure deposit holding of residential tenant deposits
- Zero deposit guarantee (zerodeposit.com) scheme for deposit processing
- When we use third party service providers, we disclose only the personal
 information that is necessary to deliver the service and we have a contract
 in place that requires them to keep your information secure and otherwise
 use your information in accordance with applicable data protection law.
- We may disclose your personal information to our insurers and /or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- In addition to the specific disclosures set out in this section, we may
 disclose your personal information where such disclosure is necessary for
 compliance with a legal obligation to which we are subject, or in order to
 protect your vital interests or the vital interests of another natural person,
 or for the establishment, exercise or defence of legal claims, whether in
 court proceedings or in an administrative out-of-court procedure.

Your rights

In this section we have summarised the rights that you have under data protection law. Some of the rights are complex, applying only in certain circumstances and subject to certain exceptions, and in the interests of keeping this policy concise, not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

You have the right:

- To object to us processing your personal information for marketing purposes. If you object, we will stop processing your personal information for this purpose. When we collect your data, you can choose whether you wish to receive marketing communications from us. If you wish to stop receiving marketing communications, you can opt out at any time by clicking an 'unsubscribe' link at the bottom of one of our emails.
- To access the information we hold about you and certain information about our processing of it and your rights in relation to it.
- In certain circumstances, to obtain erasure of the personal information we hold about you, subject to certain exceptions.
- To rectify the information we hold about you.
- In certain circumstances, to restrict our processing of your personal information or object to us processing it. If you object, we will stop processing your personal information unless certain exceptions apply.
- Where our legal basis for processing your personal information is your consent or the performance of a contract and we process it by automated means, to be provided with the personal information we hold about you in structured, commonly used and machine-readable format and to transmit the information to another controller
- To not be subject to a decision based solely on automated processing, including profiling, that produces legal effects concerning you or similarly affecting you, subject to certain exceptions.
- Where our processing of your personal information is based on your consent, to withdraw that consent at any time. If you withdraw your consent, we will stop the relevant processing, but it will not affect the lawfulness of our processing before the withdrawal.

To exercise any of these rights, email us at lettings@holkham.co.uk or write to us at The Clock Tower, Longlands, Holkham, Wells-Next-The-Sea, NR23 1RU.

If you consider that our processing of your personal information infringes data protection laws, you have the right to lodge a complaint to a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. More information about lodging a complaint with the Information Commissioner's Office (the relevant UK supervisory authority) can be found at ico.org.uk/concerns

Security precautions in place to protect your information

We take appropriate technical and organisational precautions to secure your personal information and prevent its loss, misuse or alteration. All information you provide to us is stored on our secure servers. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

The transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and for this reason we cannot guarantee the security of data sent between us over the internet.

Use of Cookies

Like many other websites, our website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns.

It is possible to switch off cookies by setting your browser preferences. For more information on the Cookies we use, visit our <u>Cookies Policy</u>.

Links to other websites

Our website may contain links to other websites run by other organisations. We are not responsible for the privacy practices of those organisations or the content of their websites. You should read the privacy policies of these organisations before providing them with any personal information.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated on 01.02.2025.

If we change our Privacy Policy we will post the changes on this page and may place notices on other sections of the website and/or notify you by email.

Further information

You can obtain further information about data protection laws by visiting the Information Commissioner's Office website at www.ico.org.uk.