

# Privacy Policy

## Who Are We

Doorknobs Limited is a sales and letting company working in Tunbridge Wells and the surrounding areas organising the sale and letting of properties as well as the ongoing maintenance of properties and buildings. We are an independent company with 1 office and up to 8 staff and want to ensure your data is safe, secure and only held for the appropriate amount of time.

## Summary

This Privacy Notice is a public document available to anyone and applies to customers of Doorknobs Limited to explain how the organisation collects and processes personal information in order to conduct normal business activities in conjunction with the sales and lettings of properties and associated activities. Normal activities can be summarised as:

- Property Sales
- Property Valuations
- Property Listings
- Applicant registrations
- Lettings & Management
- Referencing
- Property applications
- Tenancy agreements
- Property Maintenance

## What type of information will we collect from you?

The personal information we collect from you will typically include the following:

- Full name and contact details (including your contact number, email and postal address)
- Information relating to your identity where we are required by law to collect this in order to comply with the Money Laundering Regulations 2017 and the Immigration Act
- Information on your close connections where we are required to conduct conflicts of interests under regulatory obligations
- Your banking details where required such as where you are letting a property or, where renting, to set up an approved tenancy deposit account for you and arrange for rental payments
- Information on any access requirements you have necessary to enable us to find suitable properties for you, which may consist of special category personal data comprising details of any disability or other health information about you

- Details about your areas of interest where we wish to send you marketing information about similar products and services
- Usage information about your visits to our website (which enable our website to remember information about you and your preferences) and use of our site. Please read our Cookie Policy for further details. This may include information about your visit, including the full Uniform Resource Locators (URL), clicks through to and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number.
- Other technical information, including what devices you use to connect to our App, device location data where this function is not disabled by you on your device, 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.
- Your communications with us, including a record of the email or telephone correspondence created when you contact us as part of a product or service query

Where we need to collect personal data by law (for example to meet our obligations to prevent fraud and money laundering) or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **How We Collect Information**

In the general conduct of business, Doorknobs Limited collects information relevant to the services being engaged and by the following sources:

- Yourself
- Next of kin
- Business associate
- Employers
- Referencing agency
- Solicitors
- Estate agents
- Mortgage Companies
- Government / Land / Police registers
- Credit / Default Agencies
- Financial Institutes (Banks, Building Societies, Loan Agencies, Credit Card companies)

- Insurance Companies
- Health providers
- Through consent to third parties disclosing information about you to us that they have collected
- Contractors

Such information will generally be collected directly via the use of any of our standard forms, over the internet, via email, in our branches or through a telephone conversation with you. We may also collect personal information through our affiliates or suppliers.

In addition, you may choose to submit information directly to us via several methods, including:

- Through our websites or website forms.
- In response to marketing or other communications
- By signing up for a TW Property product or service
- In connection with an actual or potential business relationship with us
- By calling in and registering with us.

You may also agree to third parties disclosing information about you to us that those third parties have collected.

We, also collect certain information by using automated means, such as cookies and web beacons, when you visit our websites. The information we collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services on our websites and mobile apps the analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our websites and apps.

“Your Rights and Choices” section of this Privacy Notice specifies your ability, to opt out or limit the usage of the information collected.

### **Purposes Of Collection**

We will collect, use and hold your information for the purposes of:

- Assessing applications for and providing Doorknobs Limited products and services.
- Conducting business with Doorknobs Limited and affiliates.
- Processing payments Accounting, Auditing, Billing, Complaints, Enquiries, Credit Checks and related dispute resolution activities
- Protecting against and preventing fraud, unauthorised transactions, money laundering (please see below), tax evasion claims, compliance and security of business processes.
- Creating and managing any accounts, associated authentication criteria (ID’s and passwords).

- Providing and communicating with you about Doorknobs Limited products, services, offers and promotions, their insurance retailers and partners.

### **Anti-Money Laundering**

In addition to helping you with a property related service we have to comply with certain regulations for example the “Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to as “the Regulations).” Doorknobs Limited is required to obtain certain information from you to comply with regulations.

The information provided will only be used by Doorknobs Limited in relation to complying with the Regulations and will not be shared with any other party outside of Doorknobs Limited unless we are required to do so under law. If you decide to enter in to a business relationship with Doorknobs Limited to comply with certain regulations, we will require two separate Identification documents one primary and one secondary document even if it appears on both lists.

The information may be required at various stages of the process depending whether you are:

- Purchasing, Selling, Renting or Letting
- Primary documents – proof of ID
- Valid Passport with MRZ
- Valid full UK photo driving licence
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Valid EU/EEA/Switzerland photo driving licence.
- Valid EU/EEA/Switzerland National Identity Card.
- Valid UK Armed Forces ID Card.
- Valid UK Biometric Residence Permit (copy of both sides.)
- Valid Blue disabled drivers pass. (With photo)
- Department for Works & Pensions letter confirming pension details including National Insurance Number dated within the last 12 months.

### **Secondary documents – proof of residence**

- Valid full UK photo driving licence.
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Local authority council tax bill (dated within the last 6 months).
- UK Bank / Building societies statements/bills showing activity, dated within the last six months. Including account number and sort code.
- UK mortgage statement (dated within the last 12 months.)
- Utility bill dated within the last 6 months (Not mobile phone bills.)
- HMRC or Inland Revenue assessment or statement (dated within the last 12 months) with National Insurance number.

- Department for Works & Pensions letter confirming pension details and NI Number. (Dated within the last 12 months).

We reserve the right to employ third party electronic verification for the purpose of verifying identity. This search will not affect your credit rating.

### **Lawful Basis Of Processing**

Doorknobs Limited processes your information under the following

Performance of a contract: where you enter into a contract with Doorknobs Limited and we need to process your information as part of this contract

Legitimate interests: some information is processed by Doorknobs Limited as part of its legitimate interests which include :Fraud, risk assessment, due diligence, network and information security, suppressions and managing opting out of communications , profiling , direct marketing, monitoring, web analytics, cloud storage, acquisitions, updating customer details, lettings, sales, and other core products and service provided by the data controller

Consent : where we process information under consent we will seek your clear and unambiguous consent prior to processing your data

### **Information We Share**

We do not sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- Landlords and landlord associates and sub processors
- Vetted affiliates and partners / Financial Institutions / Insurance Companies for business facilitation to provide required services, Insurance cover etc.
- Solicitors
- Contractors and service suppliers linked to the property
- Managing agents

We contractually require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements

- Councils, health and care providers
- Other Law firms
- Credit agencies, Land Registry Office, Her Majesty's Revenue and Customs (HMRC), Financial Conduct Authority (FCA) and other relevant regulatory bodies
- Additionally we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities.

Doorknobs Limited reserves the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets, with reasonable efforts for the acquirer protect / use

your information consistent with our Global Privacy Notice. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.

### **How Long Do We Keep Information For?**

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep your information for as long as necessary. We generally keep personal information for 7 years after last contact with you.

### **Your Rights And Choices**

Your rights regarding the sensitive / personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information, and how we communicate with you.

### **Access And Correction**

You may have the right to:

- Obtain confirmation that we hold personal information about you.
- Request access to and receive information about the personal information we maintain about you.
- Receive copies of the personal information we maintain about you.
- Correct any information that is inaccurate.
- The right to access personal information may be limited in some circumstances by local law requirements.
- To exercise these rights, please contact us.
- Have information blocked, anonymised or deleted

If you would like Doorknobs Limited to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like deleted, blocked or anonymised.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us as specified in the "How To Contact Us" section below.

### **Withdrawal Of Consent**

If we obtain your information by consent you have the right to withdraw any consent you previously provided to us.

If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information.

Doorknobs Limited will apply your preferences going forward. The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.

## **How To Contact Us / Complaints And Feedback**

If you wish to raise a complaint on how we have handled your personal data or would like access and/or update information or preferences you provided to us, you can contact us to have the matter investigated by writing to Mrs Katie Chamberlain, Doorknobs Limited, 2 Vale Road, Tunbridge Wells, Kent, TN1 1BP.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the UK data protection regulator, the Information Commissioner's Office. Further details can be found at [www.ico.org.uk](http://www.ico.org.uk)