



Privacy Policy of mcandrewmartin.com

This Website collects some Personal Data from its Users.

This document can be printed for reference by using the print command in the settings of any browser.

Owner and Data Controller

McAndrew Martin Limited
1 Swan Wood Park
Gun Hill
Horam
East Sussex
TN21 0LL

Owner contact email: office@mcandrewmartin.com

Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are:

- Name and contact details (including your telephone number, email address and postal address)
- 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. We may automatically collect information about your computer or mobile device, including your IP address. This information may be combined with other information you provide to us as described above.
- Information relating to your identity where we are required by law to collect this in order to comply with Money Laundering Regulations 2017 and Immigration Act.
- Information on your close connections where we are required to conduct conflicts of interest under regulatory obligations.
- Your banking details where required such as payment for services.
- Your communication with us, including a record of any email correspondence between us and an introducing third party and/or call recording of your initial enquiry.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website.

Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.



Users are responsible for any third-party Personal Data obtained, published or shared through this Website and confirm that they have the third party's consent to provide the Data to the Owner.

On what basis can we process your information?

The legal grounds under the General Data Protection Regulations for processing your personal data are as follows:

- It is necessary for the performance of a contract to which you are a party, or to take steps prior to entering into a contract with you, for us to provide you with our products and services.
- You have given us explicit consent to the processing of your personal data namely to receive electronic marketing by us. You do not need to provide us with marketing consent in order to receive our services.
- It is necessary for the purposes of our legitimate interests, except where our interests are overridden by the interests, rights or freedoms of affected individuals (such as you). To determine this, we shall consider a number of factors, such as what you were told at the time you provided your data, what your expectations are about the processing of the data, the nature of the data, and the impact of the processing on you. Our legitimate interests include processing necessary data to improve and to promote our services and products and to better understand our customers' interests and knowledge of the property market and to administer the technical aspects of our service and products.
- Where we need to comply with a legal obligation; or in rare circumstances:
- Where we need to protect your interests (or someone else's interests); and/or
- Where it is needed in the public interest or for official purposes

Disclosure of Personal Information to Third Parties

We will hold and use personal information about you in the following ways:

- In order to fulfil our obligations to you when providing you with our property services.
- To share your information with others where necessary to fulfil our property services for you or where acting as agent for a third party on your behalf.
- To comply with our statutory and regulatory obligations, including verifying your identity, prevention of fraud and money laundering and to assess your credit worthiness.
- To communicate with you during the course of providing our services, for example with your enquiries and requests.
- Statistical purposes so we can analyse figures to help us manage our business and plan strategically for the future.
- To provide you additional property related services from third party providers, only where you have provided permission for us to do so. We may disclose personal information to:
 - a parent, subsidiary or affiliate of our company
 - third-party service providers for the purpose of enabling them to provide their services including (without limitation) IT service providers, data storage, hosting and server providers, analytics, error loggers, debt collectors, maintenance or problem-solving providers, professional advisors, and payment systems operators
 - our employees, contractors, and/or related entities
 - our existing or potential agents or business partners
 - credit reporting agencies, courts, tribunals, and regulatory authorities, in the event you fail to pay for goods or services we have provided to you

- courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise, or defend our legal rights
- third parties, including agents or sub-contractors who assist us in providing information, products, services, or direct marketing to you
- third parties to collect and process data
- an entity that buys, or to which we transfer all or substantially all of our assets and business

Third parties we currently use include:

- Partner introducers such as estate agents, mortgage brokers, solicitors etc.
- Google Analytics
- Stripe
- WorldPay
- SignRequest
- Amazon Web Services

How will we ensure the security of your data?

Your data will be stored electronically with all reasonable technological and operation measures put in place to safeguard it from unauthorised access and any identifiable information will be encrypted or minimised. Where necessary your data will be stored securely, in hard copy format, within a premises of McAndrew martin Ltd. Access to such data will be limited to McAndrew Martin Ltd personnel only.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

We will retain your personal data for different periods depending upon the service you have asked us to provide, which may be a longer period than that for which we need to hold your data to provide those services, i.e. where we are under regulatory or statutory duties to hold your data for a longer period or need to retain it in the event of a legal claim or complaint.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Analytics, Contacting the User and Managing contacts and sending messages.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

- **Analytics**
- **Contacting the User**
- **Managing contacts and sending messages**
- **For Surveys/work requested by the client.**

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.

- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Cookie Policy

This Website uses Trackers. To learn more, the User may consult the [Cookie Policy](#).

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How "Do Not Track" requests are handled

This Website does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User’s consent, the Owner shall collect new consent from the User, where required.