

## Privacy Policy

Update: please note changes to our privacy policy below dated 20 May 2018.

### Introduction

HSPC respects your privacy and shall at all times comply with the General Data Protection Regulation (“GDPR”) and all other relevant data protection legislation.

### Data Protection Administrator

We have an appointed Data Protection Administrator (DPA) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPA using the details set out below.

Our full details are:

Full name of legal entity: Highland Solicitors Property Centre Limited

Name of DPA: Bernadette Walker

Email address: [admin@hspc.co.uk](mailto:admin@hspc.co.uk)

Postal address: DPA, Highland Solicitors Property Centre Limited, 30 Queensgate, Inverness, IV1 1DJ.

Telephone number: +44(0) 1463 231173

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. We may collect your name, email address and phone number(s) (collectively “Contact” Data) depending on your interactions with the website.

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

- **Direct interactions.** You may give us your personal data by filling in forms (online or offline) or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our services;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect: internet protocol (IP) address, your login data,

browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website (“**Technical Data**”) about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties including analytics providers such as Google based outside the EU;

HSPC does not require registration in order to view schedules.

When viewing a property, you are now able to register an interest in being informed about that property only. In this case we will request your email address only.

When viewing a home report document we are required by law to request your contact details - we store your name, email and postal address. If a change is made to the home report we may contact you to inform you of this. To make life easy you can tick a box opting in to us storing your contact details in cookies on your machine. At the bottom of this page is a box showing the contents of those cookies and a facility to delete them.

Our property match system also requires that you supply us with your email address.

### **How we use of your information**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please Contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of Data</b>	<b>Lawful basis for processing</b>
To register you as a new user of the website	(a) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how users use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Contact (b) Technical	(a) 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) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Contact (b) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Contact	Necessary for our legitimate interests (to develop our products/services and grow our business)

### **Passing details to other companies**

If you supply us with your personal data either in order to be informed of changes to specific properties advertised on the HSPC website or to use our property match system, we will only use your personal data for these purposes only. HSPC undertakes to disclose your personal data to no third parties. If you decide you no longer wish to receive emails from HSPC, please visit our preferences page.

HSPC is owned and operated by the organisations solicitors firms. Both parties are joint data controllers sharing contact information from potential buyers and sellers; to and from HSPC to solicitor firms and back. This is used in order to facilitate property selling services eg. Viewing

appointments. Any data held by HSPC is solely used to provide services and not used for marketing purposes. At times contact information may be used by our solicitor firms to provide services eg. follow up on a viewing.

Please note that if you contact a member firm directly, using details on the HSPC website, subsequent personal information given to that firm or company will be used according to that company's privacy policy. HSPC's policy will no longer apply.

### **International Transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We will not hold your personal data for more than a year after you remove/delete your user account with the website unless we are required to under law.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Third party sites**

Our privacy policy does not apply to third party sites that you may access from HSPC's website. You should ensure, therefore, that you are familiar with the applicable privacy policy or other applicable terms and conditions before entering any personal information on a third party site.

### **Your Legal Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include, the right to:

- request access to your personal data.

- request correction of your personal data.
- request erasure of your personal data.
- object to processing of your personal data.
- request restriction of processing your personal data.
- request transfer of your personal data.
- right to withdraw consent.

For more information on your rights please visit the Information Commissioner Officer's website ([www.ico.org.uk](http://www.ico.org.uk))

If you wish to exercise any of the rights set out above, please contact the HSPC DPA.

### **Changes to Privacy Policy**

We will keep this policy under review, and any changes made from time to time will be posted on this page.