



PRIVACY POLICY

Turpie & Co Ltd is committed to ensuring that your privacy is protected and our use of your personal information is governed by this Privacy Notice. Any reference to “you” or “your” refers to anyone whose personal information we process.

1. Introduction

Our use of your personal data will be governed by this Privacy Notice.

Turpie & Co Ltd is a controller for the personal information that it collects and uses about you. We will treat your personal information as confidential and in accordance with applicable data protection legislation and your personal information will only be shared with others in accordance with this Privacy Notice.

This Privacy Notice explains;

- What personal information is
- How we collect your personal information
- The types of personal information we collect
- How we use your personal information
- The legal basis for processing your personal information
- How we share your personal information
- How long we keep your personal information
- How we keep your personal information secure
- Your rights in relation to your personal information
- How to make complaints and how to contact us

If there are any changes to the way in which your personal information is used, this Privacy Notice will be updated.

2. What is personal information

Personal information is any information that tells us something about you. This could include information such as name, contact details, date of birth, bank account details or any information about your needs or circumstances which would allow us to identify you.

Any references to personal information in this privacy notice will include personal data, and where relevant, special categories of personal data.

3. What personal information do we collect?

We will collect your full name and contact details (such as phone number, email address and postal address) from you whenever you engage with us.

In addition, if we are providing a service to you, or on your behalf, where we are required to do so by law, we will collect information relating to your identity, which will be at least one form of

photographic identification (such as a passport, a driving licence or an identification card) and one form of documentation with proof of your place of residence (such as a recent utility bill).

We will also confirm whether you have any relatives or close connections working at Turpie & Co Ltd so that we can consider potential conflict of interests and, if identified, how to manage these in accordance with our statutory and regulatory obligations.

Depending on the service that we provide to you (or on your behalf) we may also collect additional personal information as detailed below;

Buy, Sell, Let, Rent

If you are selling or letting a property through us;

- We will collect a contact telephone number to get in touch with you about organising viewings and updating you on any offers received or rental applications for your property.
- Where you are not the legal owner of the property we will request details from you as to your ability to sell or let the property such as a Power of Attorney, Guardianship Order or Grant of Probate.
- We will collect your bank account details to arrange onward payment of rent due to you

If you wish to rent a property we are listing;

- Specific access requirements so that we can find a property that is suitable for your needs
- Your bank / building / similar account details to allow us to manage an approved tenancy deposit account for you and to set up your rental payments.

If you wish to purchase a property we are listing for sale where you have specifically provided us with these, we will collect personal information relating to any specific access requirements you may have in relation to a property so that we can find a property that is suitable for your needs. We will also collect personal information required to source a property for you and, where required, negotiate the purchase of a property on your behalf.

Property Management

Where we engage with you to manage property on your behalf we will ask for additional emergency contact information in case we need to get in touch with you outside of working hours or in the event there is a matter requiring your urgent attention.

Other

If you subscribe to receive research, news or other market and local updates from us having no other connection with Turpie & Co Ltd we will collect your name and email address.

4. How we use your personal information

What is the legal basis of our data processing?

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so. We rely on the following legal bases to use your information;

- For employment-related purposes
- Where we need information to perform the contract we have entered into with you

- Where we need to comply with a legal obligation
- Where the processing is necessary for us to carry out activities for which it is in the legitimate interests of Turpie & Co Ltd (or those of a third party) to do so and provided that your interests and fundamental rights do not override those interests, including:
 - Processing that is necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns – this will include sending you marketing information from time to time after you have engaged us to provide services or received services from us either which may be similar and of interest to you or where you have expressly indicated that you would like to receive such information. You have the right to opt out of receiving this information at any time.
 - Processing that is necessary to improve our knowledge of the real estate sector – this will include undertaking market analysis and research so that we better understand trends in the property sector and provide better knowledge along with more tailored and relevant services for our customers in the future.
 - Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively – this will include: verifying the accuracy of information that we hold about you and create a better understanding of you as a customer; processing for administrative efficiency purposes such as where we outsource certain administrative functions to third parties who are specialise in such services; processing for network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access or to comply with a request from you in connection with the exercise of any of your rights outlined below.

In more limited circumstances we may also rely on the following legal bases:

- 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

We may process special categories of personal information and criminal conviction information in the following limited circumstances:

- With your explicit consent, in which case we will explain the purpose for which the information will be used at the point where we ask for your consent.

How we use your personal information

For specific information on how your personal information will be used for the services you have requested from us, please select from any of the options below;

Buy, Sell, Let, Rent

- We use your personal information for the purposes of fulfilling our obligations to you to let or sell your property or, if you are a buyer or tenant, for the purposes of arranging a contract for sale or a lease for you.
- If you are purchasing a property we are acting as agents for the sale of or selling a property through us we will share your personal information with your appointed solicitors and the solicitors acting for the other side of the deal as is necessary to facilitate the sale or purchase.

- If you are renting a property we are acting as letting agents of, we will share your personal data with third party referencing agencies for the purposes of the prevention and detection of crime, fraud and/or money laundering and checking your suitability to rent that property.

Property Management

- Where we are managing property on your behalf we may need to pass your personal information from time to time on to third party contractors whom we have engaged to carry out maintenance on your properties.

Other uses of your personal information

- If we sell any part of our business and/or integrate it with another organisation your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their advisers. If this occurs the new owners of the business will only be permitted to use your information in the same or similar way as set out in this privacy notice.
- We will share personal information with our regulators, governmental or quasi-governmental organisations, law enforcement authorities and with courts, tribunals and arbitrators as may be required from time to time in order to comply with our regulatory and legal obligations;
- Where we use third party services providers who process personal information on our behalf in order to provide services to us. This includes IT systems providers and IT contractors as well as third party referencing or screening agencies for the purposes of the prevention and detection of crime.
- We may share your personal information with any person working within Turpie & Co Ltd on a need to know basis to ensure we are able to perform our obligations to you.
- We will hold your personal information on our client management systems and use this to provide you with marketing information about similar services offered by Turpie & Co Ltd to those which you have engaged us to provide which we feel you might find useful from time to time. You have the opportunity to opt out of receiving this information at any time.

What happens if you do not provide information that we request?

We need some of your personal information to perform the services you have requested from us. For example:

- where we are selling a property on your behalf we need to know your contact information so that we can update you with information on viewings, offers and the progress of the sale;
- where you have asked us to find you a property which meets certain access requirements, we may need to know some further details about your particular circumstances so that we can find you a suitable property;
- where you have asked to view a property, we will require relevant personal information

We also need some information so that we can comply with our legal and regulatory obligations. For example, we may need identity documents from you to meet our obligations to prevent fraud and money laundering.

If you do not provide the information required for these purposes, we will not be able to perform our contract with you and may not be able to provide services to you or continue to provide certain services to you. We will explain when this is the case at the point where we collect information from you.

5. How we keep your information secure

The security of information is very important to us and we have measures in place which are designed to prevent unauthorised access to your personal information including but not limited to:

- Our client files are stored on our secure client management systems. Access is restricted on our client systems to those within the business who are required to have access to your information for legitimate business purposes.
- Hard copy documentation is stored in locked cabinets.

All data is hosted in datacentres which have systems and protections in place to protect against both unauthorised access, and other external factors that could cause damage to, your personal data. There are strict access requirements in place and access is restricted to those absolutely necessary.

We ensure access to personal information is restricted to Turpie & Co Ltd employees on a need to know basis. Training is provided to any of those Turpie & Co Ltd employees who need access to personal information.

6. For how long do we keep your personal information

The period for which we will keep your personal information will depend on the type of service you have requested from us. The retention period may be longer than the period for which we are providing services to you where we have statutory or regulatory obligations to retain personal information for a longer period, or where we may need to retain the information in case of a legal claim.

8. Your rights in relation to your personal information

You have a number of rights in relation to your personal information, these include the right to:

- Be informed about how we use your personal information
- Obtain access to your personal information that we hold
- Request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate
- Request that we erase your personal information in the following circumstances:
 - If Turpie & Co Ltd is continuing to process personal information beyond the period when it is necessary to do so for the purpose for which it was originally collected
 - If Turpie & Co Ltd is relying on consent as the legal basis for processing and you withdraw consent
 - If Turpie & Co Ltd is relying on legitimate interests as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us continue with the processing
 - If the personal information has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation)
 - If it is necessary to delete the personal information to comply with a legal obligation
- Ask us to restrict our data processing activities where you consider that:
 - personal information is inaccurate
 - our processing of your personal information is unlawful
 - where we no longer need the personal information but you require us to keep it to enable you to establish, exercise or defend a legal claim
 - where you have raised an objection to our use of your personal information
- Request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to

us that we need in order to perform our agreement with you and personal information where we are relying on consent to process your personal information

- Object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information; and
- Not be subject to wholly automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights please contact info@turpies.com.

9. Complaints and Contact Details

Complaints

If you have any complaints about the way we use your personal information please contact the Management Team at info@turpies.com who will try to resolve the issue. If we cannot resolve any issue, you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK). If you need more information about how to contact your local data protection authority please let us know by contacting info@turpies.com.

Contact details

If you have any questions, comments or requests regarding any aspect of this Privacy Policy, please do not hesitate to contact us by sending an email to info@turpies.com or writing to; The Management Team, Turpie & Co Ltd, 5-9 Edinburgh Road, Bathgate, West Lothian, EH48 1BA.