

DATA HANDLING POLICY

[General]

Purpose

This policy is made to comply with the requirements of GDPR and the Data Protection Act 2018. This applies only to personal data which solely or collectively might identify an individual person.

Firm Status

For the purposes of GDPR the Firm will act as a Data Controller and/or Data Processor depending upon specific circumstances.

Data Controller

Vince Rimmer MRICS – Director, is appointed as the Data Protection Officer, and will deal with all data protection matters including breaches. All requests and correspondence should be directed to Vince Rimmer.

Individual Data Protection Rights

Under data protection law, an individual has rights including:

Access - You have the right to ask us for copies of your personal information.

Rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Erasure - You have the right to ask us to erase your personal information in certain circumstances.

Restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Objection to processing - You have the right to object to the processing of your personal information in certain circumstances.

Data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Complaints

If you have any concerns about our use of your personal information, you can make a complaint to us at: Propvisory Limited - 6 Border Drive, Buckshaw Village, Chorley, Lancs., PR7 7HG

Or via email: info@propvisory.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

[Data Held/Processed]

Data Sources

Data will usually be obtained by the following means:

- Client [or prospective client] via telephone/email/letter or in person
- Party referring a Client [e.g. Mortgage Advisor, Solicitor, Other Surveyor, etc.]
- Third Party marketing services
- Publicly accessible sources [e.g. Land Registry, Local Authority Planning departments]
- Photography, Video and Audio recording devices

Data Types

The following personal data may be held, which solely or collectively could identify an individual:

- Names
- Business Names
- Position/Role
- Addresses
- Email addresses
- Telephone numbers
- Accounting details
- Photographs
- Video/Audio recordings

Storage

Data will be stored electronically in password protected computer systems.

Any handwritten notes, photographs, video/audio recordings etc. will be transferred to the central computer system at the earliest opportunity and the original documents/files erased and shredded.

Data relating to fee earning work will be held on our electronic files for a minimum of 6 years in line with our insurance and legal/regulatory requirements.

Purpose

Data will be obtained and stored for business purposes in carrying out fee earning work, accountancy, legal/regulatory requirements and internal business performance analysis.

Data Sharing

Data will only be shared with stakeholders where relevant/necessary for undertaking our work, or as otherwise required for legal/regulatory purposes.

[Consent]

Deemed Consent

Any individual providing their own data, shall be deemed to have consented to their data being processed.

Data provided by Third Parties and Publicly available sources are assumed to be correct and accurate, until we are otherwise informed. We shall also assume that Consent from the individual was provided at the point of collection.

[propvisory.]

Withdrawal of Consent

Any individual may withdraw their consent to use of their Personal Data at any time. However, where required for legitimate business purposes, the deletion of such data might not be possible [see 'Deletion of Data' below].

[Data Access Requests]

Requesting Personal Data

Any person may request a copy of the data we hold which might identify them. This request must be made in writing by standard post or email.

Within 28 days of such request a summary of the data held regarding that individual will be provided in writing – by post or email reply. The summary will state the data source, data type and list the data.

Copies of the original source of data or documents containing the data will not be provided.

Repeated Requests

No fee will be charged for a Data Access Request.

However, where an individual [or group of individuals regarding the same matter] requests copies of their data within 6 months of the original request, we reserve the right to charge an administrative fee of £50+VAT to provide the data.

Correction/Editing/Updating of Data

Any individual may request that their data is corrected/edited/updated for accuracy purposes. This request must be made in writing by standard post or email.

We will update our records within 28 days of such request and provide a copy of the updated data accordingly.

It may however be necessary for us to also retain our original records on our files, with a file note confirming the revised data.

If the request for data to be updated/revised is found to be malicious or incorrect, we reserve the right to revert to using the previous data.

Deletion of Data

An individual may request that their data is deleted from our files. This request must be made in writing by standard post or email.

We will respond by post or email reply within 28 days confirming whether or not the data can be deleted, and if not, provide suitable reasons.

The data might be present within documents which need to be retained. Where possible we will remove the data by redaction of documents.

Documents relating to fee earning work and accountancy must be retained for a minimum of 6 years. If the personal data is critical to such a document, it will not be deleted.