

## Privacy and Your Personal Information

The Leaders Romans Group must look after your personal information by law. The main legislation that applies to protecting your information is:

- General Data Protection Regulations (UK) (GDPR UK)
- Data Protection Act 2018 (DPA)
- Human Rights Act 1998 (Article 8) (HRA)
- Privacy and Electronic Communications Regulations 2003 & 2011 (PECR)
- Money Laundering Regulations 2017
- Proceeds of Crime Act 2002
- The Data Protection, Privacy and Electronic Communications (Amendments etc.)(EU Exit) Regs 2019
- Telecommunications (Lawful Business Practice)(Interception of Communications) Regulations 2000
- Regulation of Investigatory Powers Act 2000 (RIPA)

### 1. Who we are

This Privacy Notice applies to the use and processing of personal information collected under our trading names **Leaders, Romans, Boyer, Portico, Revolution, Scott Fraser, Outlook, Moginie James, Hello Ted, Hill & Clark, Bode Insurance Solutions, Mortgage Advice Bureau, Mortgage Scout, Northfields, Portico Financial Services, Relocate UK, Rebloom, Gibbs & Gillespie, Dewhurst, Orchards of London, Thorgills, Three Sixty Maintenance** and **Dunlop Heywood**, which form part of The Leaders Romans Group. **The Leaders Romans Group Limited** is the overall **Data Controller** and we have a legal duty to protect any information we collect from you. The phrases 'us', 'we' or 'our' will mean those businesses listed above which form the Leaders Romans Group Limited.

Our statutory Data Protection Officer is Zara Harrington. She can be contacted by email at [dataprotection@lrg.co.uk](mailto:dataprotection@lrg.co.uk) or in writing at Crowthorne House, Nine Mile Ride, Wokingham, RG40 3GZ.

### 2. Information covered by this Privacy Notice

This Privacy Notice covers use of personal information as defined in GDPR UK & the Data Protection Act 2018. **Personal data.** This is information, or any combination of separate pieces of information, that could be used to identify you. This includes your name, address, contact details etc.

**"Special category" personal data.** This sensitive personal information is given more protection in law. For example, details of your health or nationality.

For more details of these definitions see below.

**Personal data** is any information relating to an identified or identifiable natural person "a data subject"; an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as their name, alias, address, national insurance number, telephone number, email, contact information, financial information, IP address. It can include information in different formats including electronic data, hand-written notes, voice recordings, photographs, CCTV footage.

**Special category** personal information is personal information which reveals racial or ethnic origin, political opinions, religious/spiritual/philosophical beliefs, trade union membership, genetic or biometric data, physical or mental health data, sex life or sexual orientation data, criminal or alleged criminal offences.

### 3. Where do we get personal information from?

When you enquire or register for products and services provided by the Leaders Romans Group Limited we may collect personal information from a variety of sources.

The majority of the personal information we collect will have been provided by you during the course of your relationship with us either through face to face contact, by telephone, email or electronic communication such as messaging or emails.

However, we may also obtain your personal data from other sources including:

- information we collect when you visit our websites, please see our Cookies Policy [here](#)
- other Leaders Romans Group companies, for example our mortgage brokering service
- companies which support advertising services that promote our services including online property portals (such as Rightmove and Zoopla), social media and networking sites (such as Facebook and Twitter) and online advertising platforms
- information provided to us by other third parties, such as your solicitor
- other publically available sources such as the Electoral Roll and Land Registry

#### 4. What information do we collect?

We collect your personal information based on the service or services we are offering you. We will only collect the information needed. We will not sell your personal information to anyone. Some examples of information we may collect directly from you, can be found here:-

Information we may collect directly from you	Why we collect it
Your name, address, phone number, email address and your needs	To provide you with estate agency services to find a property to buy or sell
Your marital status, date of birth, nationality, employment details	When you enter into a residential sale or letting agreement
Your date of birth, nationality and details from identity documents you provide	To perform anti-money laundering and rent referencing checks (as required by law)
Proof that you have available funds to support any offer that you make to buy a property	To ensure you able to pay the required amount of deposit
Financial information, like a copy of your bank statement or a mortgage offer	To provide evidence of your capability to buy a property
Details of your mortgage arrangements and how long you have owned your property when you register to sell	To perform anti-money laundering checks (as required by law)
Details of any mortgage, insurance, licensing documentation and service contracts which you have in place regarding a property you wish to let	Where you are a landlord and we are providing you with letting and/or management services
Your marital status, employment details, national insurance number, nationality, residential status, bank details and credit history	To carry out referencing and credit checks
Details relating to your property including photographs, floor plans, energy performance certificate, home condition reports, property description, virtual tour, walk through video	To deliver our service to you when you engage us to market a property for you
Photographs of your property, an inspection report and inventory, to accurately record the condition of your property at the start or end of a tenancy	So we can deliver our management and letting service to you
Moving in and out dates and corresponding utility meter readings	So we can deliver our management and letting service to you

Your moving in and out dates, and details of the deposit paid where you are a tenant when registering or releasing any deposit from a deposit protection scheme	To fulfil our contract of service
Your name, gender, previous name(s), date of birth, telephone numbers, current address, previous addresses, details of your health, any dependents, your nationality, bank account details, savings, investments, existing financial commitments, your credit history, your mortgage requirements and existing protection requirements	To enquire or apply for a mortgage or insurance protection products on your behalf
Your communication and marketing preferences	To ensure we only send you details of properties and services you are interested in via your preferred communication method (as required by law)

We may request additional information from you which is relevant to the provision of specific services. If we do this, we will always tell you why the information is needed.

If you ask us to provide you with life, critical illness, or landlord insurance and we may need to gather “special category” personal information, we treat this sensitive information in accordance with the additional protection it is given under the Data Protection Act 2018 and GDPR.

Telephone calls may be recorded for training, monitoring, and security purposes. We will always advise you before any recording commences.

#### **Information we collect when you visit our websites**

We use cookies and other technologies to collect information when you visit our web sites, including when you make use of our online chat.

We may collect personal information in connection with your use of our website, such as:

- your name, email address, telephone number and property address when you register to arrange a viewing, register for property alerts, request a valuation, lettings appointment, book a mortgage appointment or submit an enquiry
- data sent from your browser may include, the date, time and length of your visit, the site from which you have come (for example Google, Firefox etc.) and your IP address

Details of how we use cookies are provided in our Cookies Policy.

#### **Information obtained from online portals**

Where you contact us via online portals such as Rightmove or Zoopla, we will use your contact details to enable us to communicate with you and offer the services you have enquired about.

#### **Information obtained from third parties**

Where we are required by law, or for legitimate business needs, we will obtain information about you from third parties, but only after we have your consent to do so. For example, the third parties we may need to contact include: credit reference agencies, employers, banks, solicitors, etc. in order to obtain references, verify your identity and confirm your income.

#### **Criminal disclosures**

Certain types of insurance may involve disclosure by you of information relating to historic or current criminal convictions or offences. When we process any criminal records checks we do so in accordance with The Data Protection Act 2018 (Schedule 1, Part 3, Paragraph 33) and Article 10 GDPR UK. We will only carry out such checks where they are necessary.

#### **CCTV & Call recording**

We currently have CCTV installed in only a couple of branches for the prevention and detection of crime and to protect our business assets. Appropriate signage is displayed if CCTV is installed. Please ask branch staff.

We only record telephone calls in our call centre. You will hear a notification to advise you of the call being recorded if recording will occur.

## 5. How we use your information

We will process the information you provide or we obtain from other sources to provide you with products and services and answer any questions you may have. If you would like to see some examples of the how we use your information in the services we offer, please see below:-

The following are examples of how we use the information we collect:

- To provide estate agency services, including marketing your property, valuing your property, arrange and carry out accompanied viewings, selling your property and helping you search for a new home
- To provide a full lettings service for tenants, prospective tenants and landlords
- To provide full property management and maintenance services
- To advise on financial products, such as mortgages, insurance and protection products
- To provide property auction services
- To carry out regulatory checks to prevent fraud, unauthorised transactions, money laundering, tax evasion etc.
- To register a tenant's deposit with a deposit protection scheme
- To process payments of rent, and maintenance for you if a property is being let
- To arrange an energy performance certificate or home report/survey inspections for you
- To offer an inventory and check in/check out service for rented properties
- To liaise with utility companies and local authorities regarding property services
- To carry out tenant referencing and credit reference checks
- To monitor and improve our products and services

## Customer Surveys

We may invite you to participate in surveys from time to time to help us gather feedback on our products and services, to make improvements. We may use a third party company to carry out these surveys on our behalf.

## Credit scoring & Automated Decisions

Some of the services provided by third parties may involve an automated decision or credit scoring to determine whether we are able to provide a service or product. You have a right to challenge an automated decision and ask for the issue to be considered by human intervention.

## 6. Lawful basis of processing your personal information

The Leaders Romans Group processes your personal information under any of the following lawful conditions:

**Consent Article 6 (1)(a) GDPR** - if we process information under consent we will seek your clear and affirmative consent before processing your data, for example, to receive marketing information of properties for sale or to let.

**Performance of a contract Article 6 (1)(b) GDPR** - this is where the collection and processing of your data is necessary for the performance of a contract to which you are a party.

**Legal obligation Article 6 (1)(c) GDPR** - where the collection and processing of your personal data is necessary for compliance with a legal obligation, for example, to comply with the Data Protection Act, verify your identity, for fraud and money laundering prevention.

**Processing is necessary for the performance of a task carried out in the public interest Article 6 (1)(e)** for example carrying out money laundering checks.

**Legitimate interests Article 6 (1)(f) GDPR** - some personal information is processed by the Leaders Romans Group as part of its legitimate interests which includes direct marketing, web analytics, sales and lettings.

## The lawful basis for processing "special category" personal information

The Leaders Romans Group processes "special category" information only when it is necessary. The lawful basis we use to process your "special category" information is:

**Explicit Consent Article 9 (2)(a) GDPR** – is freely given, specific and unambiguous consent before the processing of your data. For example, your health information will be needed to process an application for critical illness insurance.

**Data that has been made public Article 9 (2)(e)**

**Establishing, exercising or defending a legal claim Article 9 (2)(f) GDPR** – for advice on underwriting, arranging or administering an insurance contract (Schedule 1 Part 2 of Data Protection Act 2018) or on the suspicion of money laundering in line with the Proceeds of Crime Act 2002 (Section 339ZB)

You may want to inform us of your “special category” data voluntarily to enable us to offer you appropriate products or services. For example, you may have a health condition that means you are unable to climb stairs. We will record your needs/preferences without recording your medical/health conditions in most cases.

**Withdrawing consent**

You have the right to withdraw your consent at any time. Please contact the branch or office you have been dealing with.

**Children’s privacy**

We do not offer any products or services to children (defined as under the age of 16 in GDPR UK). In some circumstances, for example a mortgage application, we may be required by the mortgage provider to collect the names and dates of birth your dependent children or other adults who may reside with you.

**7. Who we share your information with**

We may share information within the Leaders Romans Group to provide you with an agreed product or service, for example planning advice or mortgage services or for any other purpose agreed by you.

**Third Party service providers**

Where we engage third party service providers to provide products (such as mortgages, home/contents insurance or utility services) or business services, (such as credit reference checks) we provide them with the minimum personal information needed to perform the service or provide the product we have requested. We ensure all third party service providers understand they are required to protect your information, and not to use it for any other purpose.

If you would like to see the third party organisations we share your information with and why, please below:-

Third party	Why we share your personal information
Approved contractors	To install for sale or to let boards, to appoint managing agents and building maintenance contractors, to arrange EPC visits, to arrange for contractors to provide safety & statutory tests and to take inventories
Surveyors	To undertake a structural or Homebuyers survey
Solicitors or conveyancers	To provide home conveyancing services
Mortgage lenders/Banks	To progress your enquiry or application for a residential or buy to let mortgage application
Insurance Companies	To progress your enquiry or application for buildings and contents insurance, critical illness cover or rent guarantee
Rent and Legal insurance providers	To set up landlord insurances, and in the event of a claim
Solicitors	To pursue a claim for breach of tenancy agreement
Referencing Companies	To check your creditworthiness, obtain a tenant references and to help prevent fraud and money laundering
Local Authority	For the payment of Council Tax

Law enforcement bodies including the police, HMRC and local Council	To comply with court orders or legal obligations
Landlord, tenant or guarantor	To comply with our legal obligations where we are providing a lettings service
The parties whose property you have viewed or on whose property you have submitted an offer	To communicate your offer or feedback on the viewing
Utility Companies	For payment of utility bills
Debt collection companies	To assist us in recovering any monies which are owed
Deposit Protection Scheme providers	To provide a Tenancy Deposit Protection Scheme
Focal Agent, I-Am Sold & Acaboom	To gather property sales information
ARLA Propertymark, a professional body responsible for raising professional standards amongst letting agents	If information relating to you is requested by them in order to protect your interests
The Property Ombudsman	Where they are providing a dispute resolution service in connection with letting services

### 8. How long we keep your information for

We are required to keep your information for as long as is reasonably necessary to fulfil our legal and regulatory obligations. We have a Retention and Destruction Schedule to ensure we comply with the relevant legislation when processing your information.

- For lettings we keep your information for 6 years + 1 after you have stopped using our service.
- For property sales we keep your information for 6 years + 1 year after the sale has been completed.
- For property auctions we keep your information for 8 years after the sale has been completed.
- For planning advice and design, we keep your information for 4 years.
- For financial records, we keep your information for 8 years if your application is successful.
- For insurance policies, mortgages and records, we keep your information for 30 years.
- For general enquiries and marketing, we will keep your information for 2 years.
- Any copies of ID documents needed to verify your identity will be kept on file for anti-money laundering for 5 years. For tenancy reference checks we will keep your information for 1 year.

Anonymised information on properties and geographical areas may be kept for longer to assist us with property market forecasting and trends. Anonymised information is not subject to privacy legislation or the Data Protection Act 2018 and may be kept for as long as it is needed.

### 9. Our marketing services

Where you contact us via our website, in branch or by phone, or via online portals such as Rightmove or Zoopla we will use the details you have supplied to us to provide you with properties by email. You can choose to unsubscribe at any time.

We may contact you to offer information about our other products and services which we believe may be of interest to you. We use several methods of communication, including:

- **By email**
- **By post**
- **Mobile Text Messages**
- **Telephone**

We only send you promotional emails, mail, text messages or contact you by telephone, if you agree to each method of communication. You can stop receiving promotional mail, text messages or telephone calls by contacting your local branch. If you would like to unsubscribe from our email service, please contact [unsubscribe@lrg.co.uk](mailto:unsubscribe@lrg.co.uk). We aim to stop emails within 3 working days, but this may be extended to 10 working days over public holidays and to cover staff absence within the Data Protection Team.

## 10. Your statutory rights

You have a number of rights concerning the personal information we process about you. You have the right to:

- ask us *for access to a copy* of your personal information we hold about you. This is called a data subject access request. We may ask you to provide ID to verify your identity.
- ask us *to correct* your personal information if it is inaccurate. We may ask you to provide confirmation to ensure the information we hold is accurate.
- ask us *to delete* your personal information. We are unable to delete your information if the law requires us to keep it for a statutory period or there is a lawful reason we must keep the information. We will always investigate any request and advise you, if we are unable to erase your data.
- *withdraw your consent* to use your personal information. Where you have provided consent for our processing of your personal data, you may withdraw that consent at any time by simply contacting the branch or team you have been speaking to.
- ask us *to restrict the use* of your personal data, including direct marketing.
- *object* to our use of your personal data for our legitimate business interests. You have an absolute right to object to our use of your data for direct marketing.
- *object to an automated decision*.

### Subject Access Request

If you wish to make a request for access to a copy of your personal data, or to exercise any of your other rights, please write to your local branch in the first instance. Further information on the request process and a subject access request form is available from [dataprotection@lrg.co.uk](mailto:dataprotection@lrg.co.uk). Please be aware if we receive all the necessary information with your request, we are able to locate your data and send it to you more quickly. We will endeavour to respond to and comply with your request as quickly as possible. We are aware of the statutory deadline for a subject access request, however we will always try to send your information before the legal deadline.

### Making a data subject access request

1. We need sufficient information for us to locate your personal data. We do not have *a single database* and some of your information may be held in paper files.
2. We need to know which of our business trading companies has processed your information and the branch or office location. (see list of trading names below)
3. If you are seeking information for a specific period of time or a specific issue, please tell us, as this will help us to fulfil your request and speed up our response to you.
4. We may need to ask you for proof of your identity. It is an offence to request the personal information relating to someone else.
5. There is no fee for this service.
6. The statutory deadline is **one month**. We may extend this deadline if your request is complex. Your request may be suspended if we need information from you to identify the location or business.
7. You will receive all the information you are legally entitled to. You will not receive information regarding third parties or other individuals. You will not receive legally privileged information.

We have a form to assist you with making your request, it is available from [dataprotection@lrg.co.uk](mailto:dataprotection@lrg.co.uk)

## 11. How we protect your information

We store your personal information on our electronic computer systems and in our paper filing systems. In accordance with the law we have strict security procedures to ensure that personal information is not damaged, destroyed or misused, and to prevent unauthorised access to your information. We have an internal breach reporting system to record all information security incidents and breaches. Serious data breaches are reported to the ICO within 72 hours, in accordance with the GDPR UK and the Data Protection Act 2018.

## 12. Data Transfers

The GDPR UK applies to the UK only. GDPR UK is based on the GDPR EU which applies all countries within the EU and European Economic Area (EEA). The EU and the UK have agreed adequacy status for the continued free-flow of personal data within the UK, EU and EEA. We will ensure that there is adequate security and

comparable legislation in place before sending your information to other countries outside the EEA. In accordance with the Data Protection Act 2018 and UK GDPR, if we need to transfer data outside the EEA and the country it's transferred to is not on an approved list for having adequate security controls in place, we will limit the amount of personal data we send. We will also impose contractual obligations (standard contractual clauses) in accordance with the EDPB (European Data Protection Board) (as approved by the ICO) from the recipients to ensure the security and confidentiality of your personal data to safeguard your information.

### 13. Legal Information about the Leaders Romans Group

- The ICO registration for The Leaders Romans Group Ltd is ZA781332.
- The Leaders Romans Group Limited is a registered company. Our registered office address is Crowthorne House, Nine Mile Ride, Wokingham, Berkshire RG40 3GZ. Our registered number is **09939099**.
- Further information regarding the Leaders Romans Group can be found by visiting <https://www.lrg.co.uk>
- These companies have the following regulatory status:
  - Bode Insurance Solutions Limited is authorised and regulated by the Financial Conduct Authority
  - The Romans Group (UK) Limited is an appointed representative of Bode Insurance Solutions Limited
  - Leaders Limited is an appointed representative of Bode Insurance Solutions Limited
  - LRG Financial Services Limited is an appointed representative of Mortgage Advice Bureau Limited and Mortgage Advice Bureau (Derby) Limited
  - Mortgage Scout is an appointed representative of Mortgage Advice Bureau Limited and Mortgage Advice Bureau (Derby) Limited

### Links to other websites

Our websites and communications with you may provide links to other websites for your convenience and information. These websites operate independently from us and have their own privacy notices or policies, which we strongly suggest you review. Where linked websites are not owned by the Leaders Romans Group, we are not responsible for their compliance with the GDPR UK, the Data Protection Act 2018 or other privacy legislation.

### Updates to our Privacy Notice

We reserve the right to amend and update this Privacy Notice as required, therefore it is advisable you review this notice at regular intervals.

This Privacy Notice was last updated in March 2022.

### 14. Who to contact to make a complaint

If you wish to make a complaint about our compliance with data protection or GDPR to our statutory Data Protection Officer Zara Harrington, please write to her at [dataprotection@lrg.co.uk](mailto:dataprotection@lrg.co.uk)

*We ask you to state in your complaint, the following information to enable an independent investigation:-*

- *Your name, contact email address and the address of the property (if regarding a tenancy, a sale, maintenance issue, mortgage or insurance policy)*
- *The business trading name (see below), branch location and names of any staff members*
- *A description of the complaint, time period or relevant dates, and*
- *Please attach details if your issue relates to a letter, property description, copy of email etc.*

Once we have the information above, an investigation will be carried out by the Data Protection Team. We aim to respond to your complaint as soon as possible, but no later than 10 days from receipt. If you remain dissatisfied following a complaint to our Data Protection Officer, you can submit a complaint about data protection, privacy and data sharing issues directly to the Information Commissioner's Office (ICO) at:

**Information Commissioner's Office** Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF



Website: <https://ico.org.uk/> Email: [casework@ico.org.uk](mailto:casework@ico.org.uk) Telephone: 0303 123 1113

#### 15. Legal information on the Leaders Romans Group companies

Trading Name	Legal Name	ICO registration number	Company registration number
LRG	The Leaders Romans Group Ltd	ZA781332	09939099
LRG Employees Limited	LRG Employees Limited	ZB231379	10854720
Leaders	Leaders Ltd	Z4721354	1690574
Romans	The Romans Group (UK) Ltd	Z6240564	2161874
Boyer	Boyer Planning Ltd	Z971775X	2529151
Revolution	Revolution Property Management Ltd	Z1545133	5877457
Bode Insurance	Bode Insurance Solutions Ltd	ZA572832	3101637
Scott Fraser	Scott Fraser Ltd	Z8310524	5480849
Leaders Sales	Leaders Sales Limited	ZB083083	4597727
Moginie James	The Romans Group (UK) Ltd	Z6240564	2161874
Gibbs Gillespie	The Romans Group (UK) Ltd	Z6240564	2161874
Outlook	Leaders Ltd	Z4721354	1690574
Orchards of London	Orchards of London Ltd	Z3620808	06842255
Portico	Portico Property Limited	Z9086181	04971609
Hello Ted	Hello Ted Ltd	ZA539275	12061002
Romans Services	Romans Professional Services Ltd	Z7261725	2606388
Mortgage Advice Bureau	LRG Financial Services Ltd	Z726842X	3155032
Mortgage Scout	LRG Financial Services Ltd	Z726842X	3155032
Moginie James FS	LRG Financial Services Ltd	Z726842X	3155032
Northfields	Northfield Estates Ltd	Z1880775	02357461
Portico FS	Portico Financial Services Ltd	ZA467455	11593121
Relocate UK	Relocate UK Ltd	Z7053756	3009421
Rebloom	Rebloom Ltd	ZA137423	8699382
Hill & Clark	Leaders Limited	Z4721354	1690574
Thorgills	Thorgills Property Group Ltd	Z2768365	06570368
Dewhurst	Dewhurst Lettings Ltd	ZB200705	06728314
Three Sixty Maintenance	Three Sixty Maintenance Ltd	ZA907149	12312244
Dunlop Heywood	Capgen Services Ltd	ZA781326	6598995