



# GDPR Privacy Notice

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*\*Henry Adams companies covered by this policy:*

*Henry Adams LLP*

*Henry Adams Fine Art Ltd*

*Henry Adams Holdings Ltd*

*Gibson Gammon Residential Lettings Ltd*

*Henry Adams HRR Ltd*

*MBT Asset Management Ltd*

*Simply New Homes Ltd*

*Jacobs and Hunt Management Services Ltd*

*Henry Adams Ltd*

*Henry Adams Strategic Land Ltd*

*Henry Adams Lettings Ltd*

*Henry Adams Midhurst*

*Henry Adams Horsham Lettings LLP*

*Simply Henry Adams Ltd*

*Ask Henry Ltd*

## Introduction and background

The purpose of this policy is to outline how Henry Adams\* has established measures to protect your privacy and information rights.

## Your rights

We recognise that you have rights as a 'data subject', and that we have an obligation to uphold these. This privacy notice aims to outline how we maintain these rights. In particular, it outlines:

- How we collect and process your information,
- Why we do this,
- How you can exercise your rights,
- Who to contact in the event you're unhappy with our performance.

Your information rights:

Right	Explanation
Right to be informed	This encompasses the obligation for us to be transparent in how we collect and use your personal data.
Right of access	You have the right to access your personal data and supplementary information.
Right to rectification	If the information we hold on you is inaccurate or incomplete, you can request we correct this.
Right to erasure	You can request we delete or remove personal data where there is no compelling reason for us to continue processing.
Right to restrict processing	You have the right to request we cease processing your data, if: <ul style="list-style-type: none"> <li>• You consider it inaccurate or incomplete;</li> <li>• Where you object to processing and we are considering whether we still have a legitimate interest to process it.</li> <li>• Where we don't need the data for the original reason we collected it, but may need it to support a legal claim.</li> </ul>
Right to data portability	Where you have consented to our processing your data, or where the processing is necessary for us to deliver a contract, you can request a copy of that data be provided to a third party in electronic form.
Right to object	You have the right to object to our processing under certain circumstances. For example, you can object to: <ul style="list-style-type: none"> <li>• Direct marketing (including profiling); and</li> <li>• Processing for purposes of scientific/historical research and statistics.</li> </ul>
Rights relating to automated decision making including profiling	Where we apply automated decision making, we must <ul style="list-style-type: none"> <li>• Give you information about the processing,</li> <li>• Introduce simple ways for you to request human intervention or challenge a decision,</li> <li>• Carry out regular checks to make sure that our systems are working as intended.</li> </ul> Information related to automated decision making is contained later in this notice.

This privacy notice should outline how we are transparent in our processing. Please get in touch with us through the 'contact details' section to find out more or to exercise your information rights.

## Information we collect

Please find below a summary of the information we collect and how we use this to deliver services to you.

## DATA PROTECTION PRIVACY NOTICE – Henry Adams

Henry Adams Residential Sales		
Information we collect	Why we collect this	How we process this
Client name, home address, telephone numbers and e-mail address.	For the purpose of conducting business with the client.	Office filing system with password protected property software system.
Photographic identification and proof of residency (this could include bank statements ).	To comply with UK Money Laundering Regulations 2017.	Using secure office filing system.
Property keys and alarm details.	To perform our day to day estate agency business.	Using secure code system.
Transfer of Data		
Data may be shared with Solicitors, Surveyors, Professional photographers, Mortgage brokers and other departments within the Henry Adams business i.e. Henry Adams Fine Art, Land & New Homes and Lettings.		
Retention of Data		
From May 25 <sup>th</sup> 2018 data will be held indefinitely in accordance with our business processes. This applies to all clients that have bought, sold or had a property valued by Henry Adams. If you object to this retention, please contact us – details provided in the 'Contact' section.		
Automated Decision Making		
Prospective Applicant records, inactive for a period of 2 years will be archived.		
Securing your Information		
Information is stored electronically on our software system and our secure office filing systems, password protected. Adhere to the NAEA regulations.		

Henry Adams Residential Lettings and Holiday Lets		
Information we collect	Why we collect this	How we process this
Client name, home address, telephone numbers and e-mail address.	For the purpose of conducting business with the client, in accordance with tenancy agreements and terms and conditions.	Secure Property Management Software and secure office filing systems.
Photographic identification.	To verify clients identity and undertake Right to Rent assessments.	Secure Property Management Software and secure office filing systems.
Bank details	To pay clients' money in accordance with agreed contracts.	Secure Property Management Software.
Credit search history	To qualify potential tenants for properties.	Secure Property Management Software and office filing systems.
Employment and income information.	To qualify potential tenants for properties.	Secure Property Management Software and office filing systems.
Property keys and alarm details.	To perform our day to day estate agency business.	Using secure code system.

## DATA PROTECTION PRIVACY NOTICE – Henry Adams

<b>Transfer of Data</b>
Data may be shared with landlords, referencing and credit agencies, utility management companies or utility companies or the Local authority from time to time dealing on any legal matters of a mutual client. Data may also be shared with inventory software providers or inventory providers, clients, tenancy deposit protection organisations or insurers, contractors, banking organisations, solicitors taking contractual remedy action, the landlord or agents insurers, The Home office, HMRC and other departments within the Henry Adams business i.e. Henry Adams Fine Art, Land & New Homes and Residential Sales.
<b>Retention of Data</b>
Data will be held for up to 10 years from first client engagement or 7 years following the cessation of a contract. If you object to this retention, please contact us – details provided in the 'Contact' section.
<b>Automated Decision Making</b>
Prospective Tenant records inactive for a period of 80 days will be archived.
<b>Securing your Information</b>
Information is stored electronically on our software system and our secure office filing systems, password protected. Audited in accordance with ARLA regulations.

Henry Adams New Homes		
Information we collect	Why we collect this	How we process this
Client name, home address, telephone numbers and e-mail address.	For the purpose of conducting business with the client.	Using email for awareness of suitable property developments (using Mail Chimp) for both current and future developments.
Copy client identification, Passports, Driving Licences, Utility bills, Bank details from purchasers.	To conform to the Money Laundering Regulations 2017.	Using secure office filing system.
Reservation forms, CML forms and sales Incentive forms for purchase.	For the purpose of business with the purchaser and developer.	Using secure office filing systems.
Name, address, telephone number and email address.	For the purpose of being financially qualified by our Independent Financial Adviser.	By email and telephone call to Financial Adviser.
Simply New Homes Database of registered prospective buyers.	For the purpose of conducting our New Homes business.	Using secure office filing systems.
<b>Transfer of Data</b>		
Data may be shared with solicitors and / or accountants from time to time dealing on any legal matters of a mutual client. Data may also be shared with Independent Financial Advisers and Estate Agents for the purpose of sales progression in a purchase.		
<b>Retention of Data</b>		
Archived files are kept for 7 years. Storage and destruction is outsourced. If you object to this retention, please contact us – details provided in the 'Contact' section.		
<b>Automated Decision Making</b>		
Prospective Applicant records, inactive for a period of 2 years will be archived.		

<b>Henry Adams Development Land</b>		
<b>Information we collect</b>	<b>Why we collect this</b>	<b>How we process this</b>
Client name, home address, telephone numbers and e-mail address.	For the purpose of conducting business with the client.	Data is accessed from secure office filing systems and is referred to throughout the duration of a contract.
Copies of Passports, Driving Licences, Utility Bills from clients who instruct us.	To conform to the Money Laundering Regulations 2017.	Verified copies of identification are held in our secure office filing systems.
Bank Details and proof of funds in the form of a copy of a Bank Statements from prospective purchasers.	To fulfil our obligations in acting as agents in a proposed sale.	Data is filed in our secure office filing systems.
Contact details for prospective purchasers of development land totalling.	To conduct our business on behalf of our client.	Data is sorted and filed in our secure office filing systems.
<b>Transfer of Data</b>		
Data may be shared with solicitors, land agents and other professional bodies for the purpose of business (sale/purchase process).		
<b>Retention of Data</b>		
The Development Land Department retain files for approximately 11 years from the last point of contact with a client. File archiving is then outsourced. Electronic files are then archived internally. If you object to this retention, please contact us – details provided in the 'Contact' section.		
<b>Automated Decision Making</b>		
n/a		
<b>Securing your Information</b>		
Henry Adams applies technical and organisational security measures in line with ISO 9001:2015. Adhere to and audited by RICS.		

<b>Henry Adams Planning</b>		
<b>Information we collect</b>	<b>Why we collect this</b>	<b>How we process this</b>
Client name, home address, telephone numbers and e-mail address. Details of property dealing with re. planning and a note of likely fee.	For the purpose of conducting business with the client.	A Job Sheet is completed and filed within our client file in the secure office filing system.
Confidential business case/viability information which could be in the form of financial information, business accounts etc.	To justify an exemption to planning policy requirements	Included as part of a Planning Statement/Case Report to a local authority/Planning Inspectorate. Kept on client file.
Property access arrangements.	To conduct viewings and property inspections.	Registered in our secure system.
<b>Transfer of Data</b>		
Data may be shared with a third party company such as one undertaking Ecological or Ground Surveys on behalf of the client. Data may include name of client, address and details of property where survey is to be		

undertaken and the correspondence address.

**Retention of Data**

The Planning Department retain files for 7 years from the last point of contact with a client. File archiving is then outsourced and electronic files are archived internally. If you object to this retention, please contact us – details provided in the ‘Contact’ section.

**Automated Decision Making**

n/a

**Henry Adams Professional**

<b>Information we collect</b>	<b>Why we collect this</b>	<b>How we process this</b>
Client name, home address, telephone numbers and e-mail address.	For the purpose of conducting business with the client.	Information is collected and if instructed, client files held in secure office filing system.

**Transfer of Data**

Data may be shared with other professionals within Henry Adams and external professionals such as solicitors, accountants, tax advisers, etc. In some circumstances we may need to provide Data to HMRC, The Probate Registry and HM Court Service/Property Tribunal if required in connection with the business undertaken for the client.

**Retention of Data**

Completed jobs (files) are kept for 12 years. On matters which do not proceed beyond a quote records can be deleted as soon as possible. If you object to this retention, please contact us – details provided in the ‘Contact’ section.

**Automated Decision Making**

n/a

**Securing your Information**

Henry Adams applies technical and organisational security measures in line with ISO 9001:2015. Adhere to and audited by RICS.

**Henry Adams Agricultural**

<b>Information we collect</b>	<b>Why we collect this</b>	<b>How we process this</b>
Client name, home address, telephone numbers and e-mail address.	For the purpose of conducting business with the client.	Details kept in secure office filing system.
Details regarding leases, tenancies etc. held by the client.	For the purpose of business with the client.	Details kept in secure office filing system.
Information on Basic Farm Payment.	To conduct business with the Rural Payments Agency on behalf of clients.	Copies of forms submitted are held in our secure office filing systems.
Data required for submission to the Environmental Scheme.	To conduct business with Natural England on behalf of clients.	Copies of forms submitted are held in our secure office filing systems.
Financial Data for rent collection.	To fulfil our Client contract.	Financial data held in our secure office filing system.

## DATA PROTECTION PRIVACY NOTICE – Henry Adams

Prospective applicant name, address email and telephone numbers.	To conduct our client rural agency business.	Electronic database password protected and secured in our office filing system.
AML evidence and proof of identification.	To conform to the UK Money Laundering Regulations 2017.	Once checked, data is secured in our internal office filing system.
<b>Transfer of Data</b>		
Data may be shared with solicitors and/or accountants as requested. Data may also be shared with the Rural Payments Agency and/or Natural England on claim forms for 'subsidies'.		
<b>Retention of Data</b>		
Due to the nature and processes of the Agricultural business, data (client files) is retained indefinitely. Files are archived internally In our secure office filing system and are destroyed or deleted when applicable. If you object to this retention, please contact us – details provided in the 'Contact' section.		
<b>Automated Decision Making</b>		
Prospective buyers or tenants records, inactive for a period of 2 years will be deleted.		
<b>Securing your Information</b>		
Information is stored electronically on our software system and our secure office filing systems, password protected. Adhere to and audited by the RICS.		

### Henry Adams Commercial

Information we collect	Why we collect this	How we process this
Client name, home address, telephone numbers and e-mail address. Terms and conditions for each project including proof of funds.	For the purpose of conducting business with the client.	All information is stored in our secure electronic office files.
Proof of identification such as passport or driving licence photo.	To conform to the UK Money Laundering Regulations 2017.	All data is stored in our secure electronic office files.
<b>Transfer of Data</b>		
Data may be shared with other professionals within Henry Adams and other external professionals such as solicitors, accountants, architects and other chartered surveyors.		
<b>Retention of Data</b>		
Given the nature of the services provided, data (client files) is retained indefinitely. Files are archived internally In our secure office filing system and are destroyed or deleted when applicable. If you object to this retention, please contact us – details provided in the 'Contact' section.		
<b>Automated Decision Making</b>		
Prospective buyer or tenant records, inactive for a period of 7 years will be deleted.		

### Henry Adams Fine Art

Information we collect	Why we collect this	How we process this
Client name, home address, telephone numbers and e-mail address. Bank details, property	For the purpose of conducting business with the client.	Some information is imported from online bidding platforms. Mostly information is verbally

## DATA PROTECTION PRIVACY NOTICE – Henry Adams

contents details, some details on death certificates. Bidding details, buying and selling history, item description and owner details.		taken and processed through our secure office filing systems and software systems.
Proof of identification such as passport or driving licence photo.	To conform to the UK Money Laundering Regulations 2017.	All data is stored in our secure electronic office files.
<b>Transfer of Data</b>		
Personal data will, when instructed, be passed to carriage / removal companies with a customer receipt and other departments within the Henry Adams business i.e. Henry Adams Residential Sales, Land & New Homes and Residential Lettings when requested. Using software systems, data is used to inform clients of upcoming auctions via Mailchimp.		
<b>Retention of Data</b>		
7 years or up to 20 years for insurance valuations. If you object to this retention, please contact us – details provided in the 'Contact' section.		
<b>Automated Decision Making</b>		
n/a		
<b>Securing your Information</b>		
Information is stored electronically on our software system and our secure office filing systems, password protected. Adhere to and audited by the RICS.		

### Use of cookies

Like many major websites, the Henry Adams Website may use "cookies" which store some information on computers accessing the Website. Cookies may be used by us for a variety of purposes. For example, we may use cookies to recognise a computer which has previously visited this Website and customise the Website according to previous preferences and site behaviour. Cookies may also be used to manage security and store information about the type of browser being used. With most Internet browsers, users can erase cookies from their computer's hard drive, block all cookies, or receive a warning before a cookie is stored. However, some parts of this Website may not function fully for users that disallow cookies. Further information on deleting or controlling cookies is available at [www.aboutcookies.org](http://www.aboutcookies.org).

### Contact details

We recognise that you may have questions on how we process and/or store your data, or may want to change either the data we hold on you or how we communicate with you in the future.

If you have given consent for processing, you are free to withdraw that consent. To let us know this is the case, email [dataprotection@henryadams.co.uk](mailto:dataprotection@henryadams.co.uk). If you have any questions in respect of this notice, or would like to exercise your rights as a data subject (for example, to correct data or to exercise your right to access):

- Henry Adams as data controller can be contacted at [dataprotection@henryadams.co.uk](mailto:dataprotection@henryadams.co.uk).
- Data Protection Officer can be contacted at [dataprotection@henryadams.co.uk](mailto:dataprotection@henryadams.co.uk).

If you are unhappy that we have not responded to your query adequately, or if you have a further complaint, the Information Commissioner's Office can be contacted at <http://ico.org.uk> 0303 123 1113.

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