

# MARTIN LACEY BUCKLEY

## CHARTERED SURVEYORS



### GDPR/Privacy Policy

We ask that you read this website privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This website privacy policy is divided into the following sections:

- Who we are
- Our website
- Do you need extra help?
- Data Controller
- Compliance Officer
- Contacting US
- Contacting the Regulator
- Our Website
- Our collection and use of your personal information
- Our legal basis for processing your personal information
- Who we share your personal information with
- Transfer of your information out of the UK and EEA
- Your rights
- Exercising your Rights
- Responding to your requests
- Keeping us informed
- If you fail to provide personal data
- Keeping your personal information secure
- Cookies and other technologies
- Marketing
- Changes to this website privacy policy

#### Who we are

This website is operated by Martin Lacey Buckley Limited, The Office, Ludwell Barn, Hook Lane, West Hoathly, West Sussex, RH19 4PX is a limited liability company registered at Companies House with registration number: 08169876. Our registered office address is 4 Heath Square, Boltro Road, Haywards Heath, West Sussex, RH16 1BL. Our Value Added Tax registration number is 857 8575 59.

We are independent property Professionals who are chartered surveyors and valuers and for more information see [http://www.martinlaceybuckley.com/About\\_Us/index.php](http://www.martinlaceybuckley.com/About_Us/index.php).

We are committed to respecting and protecting the privacy of all visitors to our website (the “website”) and of its clients and contacts. In this document, we refer to Martin Lacey Buckley Limited as “we” “us” and “our”.

Please read this policy to understand how we collect, use, and store and protect the personal information that you provide to us or that we obtain or hold about you and understand what your privacy rights are in relation to personal information that we hold about you.

When we collect, use or store personal information about you, we are regulated under the [General Data Protection Regulation](#) which applies across the European Union and the United Kingdom and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

### **Do you need extra help?**

If you would like this document in another format (or example: audio, large print, braille) please contact us (see “Contacting Us” below).

### **Data Controller**

We are the Data Controller for your personal data, unless we notify you otherwise. This means that we are responsible for determining the purposes for which, and the manner in which, your personal data is collected, used, stored and protected.

### **Compliance Officer**

David Buckley is the Director who is responsible for overseeing compliance with this policy and for dealing with all data privacy matters.

### **Contacting Us**

You may contact us at Martin Buckley Lacey, The Office, Ludwell Barn, Hook Lane, West Hoathly, West Sussex, RH19 4PX (<https://martinlaceybuckley.com>) or telephone 01444 416792.

Alternatively, any questions or comments about this policy or the way in which we use your personal information or any requests in relation to your rights or any concerns about the use of your personal information may be addressed to us at [info@martinlaceybuckley.com](mailto:info@martinlaceybuckley.com).

### **Contacting the Regulator**

We hope we can resolve any query or concern you raise about our use of your information but in the event that we do not do so to your satisfaction you can contact the Information Commissioner’s Office (“ICO”) for information, advice or to make a complaint via its website <https://ico.org.uk.concerns> or telephone 0303 123 1113.

### **Our website**

This privacy policy relates to your use of our website, <http://www.martinlaceybuckley.com> only.

We may, from time to time, contain links to and from third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies.

For privacy information relating to these other third party websites, please consult their privacy policies as appropriate.

Our website is not intended for use by children.

## **Our collection and use of your personal information**

There are a number of ways in which we may collect your personal information:-

- We may automatically collect technical information about you when you visit our website, such as your IP address (a series of numbers that identifies a computer, mobile or other device on the internet), login data, marketing preferences, browser type and version, or browsing activity while on our website (see 'Cookies' below), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. We will use this information to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to improve our website to ensure that content is presented in the most effective manner for you and for your computer. It may also be necessary to allow you to participate in interactive features of our service, when you choose to do so, or as part of our efforts to keep our website safe and secure, or to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- You may provide contact information and identity information directly when making an enquiry through our website or contacting us by telephone / email or otherwise and asking us to contact you, such as your name, title, address, telephone number and/or email address and any other information you provide when you register to use our site, subscribe to or request information about our services, book you onto a course or an event, request marketing information be sent to you, provide us with feedback, or when you report a problem with our website.
- When you visit any of our office(s) which may have CCTV systems operated for the security of both staff and visitors, if we do, we may collect identity information as these systems may record your image during your visit.
- If you ask us to provide an estimate of costs for our services, or if we provide you with free initial advice or you enter into a contract with us or become our client, or we are asked to undertake the necessary steps prior to you becoming our client or before entering into a contract with you, you may be asked to provide us with contact information so that we may introduce you to our property professionals, administer any application you might make, and identity information to verify your identity e.g. your address, date of birth, passport details, or photo driver's licence details, and transactional information (details about your matter and circumstances) as well as contact information for you and other parties to the matter along with any additional information that we consider relevant as part of your instruction so that we may provide legal services.
- We may collect information about you from publicly available sources, for example from Companies House, HM Land Registry or the relevant planning department.
- We may also receive information about you from third parties such as other law firms, insurers, estate agents, accountants, banks, surveyors, and other advisors and specialists. Our clients and matter contacts may also provide us personal information about you if you are involved in a dispute with one of our clients or have a connection with them such as being a tenant of a client.
- Depending on the nature of the work that we are undertaking, we may in certain cases collect special categories of personal data (this includes details about your race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We may in certain cases also need to collect information about criminal convictions and offences.

- We may combine this information we receive from other sources with information you give to us and information we collect about you. We may use the combined information for the purposes set out above (depending on the types of information we receive).

### **Our legal basis for processing your personal information**

When we use your personal information we shall only use it for the purpose it was collected and where we have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why and we may rely upon more than one legal basis for which we are using your personal information.

The legal bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose
- **contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract and/or to provide you with information and services that you request from us.
- **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations). For example in carrying out anti-money laundering checks or where we are obliged to pass on details of people suspected of being involved in money laundering to law enforcement
- **vital interests:** where our use of your personal information is necessary to protect you or someone else's life. For example, if you were unfortunate enough to fall ill or suffer an injury on our premises
- **public task:** where our use of your personal information is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests). For example, in a way which might reasonably be expected in the course of conducting or managing our business for example to advise you of updates which affect your position or tell you about our services that we think may be of interest to you or to administer, support improve and develop our business generally, make our systems and procedures more efficient and secure and to give you the best service and the best and most secure experience

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). If you have any questions concerning how we assess our legitimate interests against any potential impact on you in respect of specific activities you can contact us at [info@martinlaceybuckley.com](mailto:info@martinlaceybuckley.com).

If we process any special categories of information (i.e.: details about your race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) we must have a further lawful basis for the processing. This may include where:-:

- you have given us your explicit consent to do so e.g. to cater for your medical or dietary needs at an event
- it is necessary to protect your vital interests or someone else's vital interests
- you have made the information public
- it is necessary for reasons of substantial public interest e.g.: to undertake activities in relation to the prevention or detection of fraud or other unlawful or dishonest activities.

If we process any information relating to your criminal convictions or offences, we will typically rely on one of the following lawful bases:

- preventing or detecting unlawful acts
- complying with our regulatory requirements in relation to unlawful acts or dishonesty
- dealing with suspicions of terrorist financing or money laundering
- where it is necessary for us to obtain legal advice or establish, exercise or defend legal rights.

We will not use your personal information otherwise than is permitted by law nor in any way that is inconsistent with the original purpose(s) for which it was collected, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at any time.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your consent, in compliance with the above rules, where this is required and permitted by law.

### **Who we share your personal information with**

We may in certain circumstances share your personal data with third parties.

When we transfer the information to third parties to enable them to process it on our behalf, we ensure that the providers meet or exceed the relevant legal or regulatory requirements for transferring data to them and keeping it secure.

Third parties to whom we may in certain circumstances need to transfer your personal data to may include: -

- Service providers acting as processors who provide IT and System administration services, analytics and search engine providers that assist us in the improvement and optimisation of our website;
- Members of our group, including subsidiaries or ultimate holding company (if any HM Revenue and Customs, regulators and other authorities, law enforcement or fraud prevention agencies acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances);
- Lawyers, other experts, brokers, agents, bankers, auditors and insurers who provide such relevant services
- Organisations or professional advisers with whom we are working on client matters or to whom we are referring you for additional or separate advice. If you agree to act as a referee

for us in relation to property work we are tendering for, we will only do this with your prior permission.

- In the event that we acquire other businesses or assets or merge with another business entity or chose to sell, transfer, or divest parts of our business or assets, or we carry out internal corporate restructuring, your personal information may be disclosed to prospective sellers or buyers and shall be transferred to our new business partners or owners or new corporate entities who shall continue to use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes in accordance with our instructions.

Some of our third-party refers may be based outside the European Economic Area – for further information, including how we safeguard your personal data when this occurs, see “Transfers of your personal information out of the EEA”.

We will not share your personal information with any other third party.

### **Transfer of your information out of the UK and EEA**

Some of the information you provide to us will be held on our computers in the UK and will only be accessed by or given to our employees, agents or affiliates working in the UK.

Information you provide to us may also be transferred to, stored and processed by third-party organisations which process data for us and on our behalf, such as third-party IT platforms (including cloud-based platforms), suppliers of administrative and support services, suppliers of other specialist products. These third parties may be based (or store or process information) in the UK or elsewhere including outside of the EEA.

Any transfer of your personal information will be subject to appropriate safeguards as permitted under the GDPR or such other relevant applicable laws that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information.

Please contact [info@martinlaceybuckley.com](mailto:info@martinlaceybuckley.com). If you would like further information about the specific mechanism used by use when transferring your data outside of the EEA.

We will not otherwise transfer your personal data outside of the area comprising the UK and EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

### **Your rights**

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations

- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on an individual's rights under the General Data Protection Regulation.](#)

### **Exercising your rights**

If you would like to exercise any of those rights, please:

- email, call or write to our Data Protection Officer
- let us have enough information to identify you, for example, your name, file number registration details,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates including any account or reference numbers, if you have them

### **Responding to requests**

We shall try to respond to all legitimate requests within one month of your providing us with proof of your identity and any additional information we may require in order to speed up our response to your request. Occasionally it may take us longer than a month if your request is particularly complex or you have a number of requests. In this case, we will notify you and keep you updated.

You will not generally have to pay a fee to access a copy of your personal data (or to exercise any of your rights). However, in certain circumstances we may be entitled to charge a reasonable fee to meet our costs in providing you with details of the information we hold about you, for example whether your request is clearly unfounded, repetitive or excessive. In such circumstances, we may also be entitled to refuse to comply with your request.

### **Keeping us informed**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under a contract we have with you and you fail to provide information when requested, we may not be able to perform the contract we have or are

trying to enter into with you. In this case, we may have to cancel the terms of engagement which you have with us, but we will notify you if this is the case at the time.

### **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

Whenever we collect or process your personal data, we will only store it for as long as is necessary for the purpose for which it was collected including for the purposes of satisfying any legal, accounting or reporting requirements.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

For information on our retention of information policy you can contact us at [info@martinlaceybuckley.com](mailto:info@martinlaceybuckley.com).

### **Cookies and other tracking technologies**

A cookie is a small text file which is placed onto your device (e.g.: computer, smartphone or other electronic device) when you use our website. Cookies help websites to perform certain functions, for example, to know who you are if you log into a restricted part of a website, or for tracking purposes.

If you do not want to receive cookies, you can usually reject them in your browser setting provided they are not necessary for the delivery of a website or its services.

Information gathered through cookies and similar technologies are used to measure and analyse information on visits to our websites, to tailor the websites to make them better for visitors and to improve technical performance. We will not use the data to identify you personally or to make any decisions about you.

Further information on cookies, our use of cookies, when we will request your consent before placing them and how to disable them, please contact: [info@martinlaceybuckley.com](mailto:info@martinlaceybuckley.com)

### **Marketing**

We would like to send you information about our services, which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email, telephone, text message (SMS).

We may send you marketing communications if you have requested information from us or purchased services from us or if you provide us with your details and, in each case, have not opted out of receiving marketing communications from us.



We wish to ensure that you receive the information that you wish to receive in the way you want to receive it. If you no longer wish to be contacted in this way, you may opt-out or amend your preferences by emailing us at [info@martinlaceybuckley.com](mailto:info@martinlaceybuckley.com) at any time.

We will never sell your information to third party marketing companies.

For more information on your rights in relation to marketing, see “Your Rights” above.

### **Changes to our privacy policy**

We may make changes to this policy from time to time as our business and / or the law changes. If we do make changes, we may, where appropriate, inform you in advance but you should visit our website frequently to check for changes or to view the most current version of our privacy policy.

Martin Lacey Buckley Limited

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