

## Landreeve Ltd Privacy Notice

### Introduction

At Landreeve Ltd, we take privacy and confidentiality very seriously. We adhere to the UK's data protection legislative framework, including the European General Data Protection Regulation (GDPR) and the UK's own legislation, as well as the confidentiality obligations that apply to us as arbitrators and RICS Regulated surveyors.

In the course of providing surveying and dispute resolution services and advice to our clients and operating our business, we collect and use personal information about a number of different categories of people. We have written this privacy notice to be completely transparent about the personal information we collect and use.

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## Who is the data controller?

For the purpose of the Data Protection Act 2018 (“the Act”), the data controller is Landreeve Ltd (company number 12594915) of 13D The Stables, Sansaw Business Park, Hadnall, Shrewsbury SY4 4AS. We are registered with the Information Commissioner’s Office (“the ICO”) for Data Protection under reference number ZB290385.

## Who does this privacy notice apply to?

We have written this privacy notice for the benefit of the following categories of people (hereinafter referred to in this notice as “you”):

- Our clients and anyone who represents them or works for them;
- Customers of our clients, that our clients have instructed us to advise or act for;
- Anyone who enquires about our services;
- Anyone who has signed up to receive our updates, posts, videos or initial assessments through the “Submit a Site” function on our website, or that we might otherwise contact to offer our services;
- People who follow us on any social media channels or who visit our website;
- People who are involved in one of our client’s matters, including expert witnesses or the other party in a transaction or dispute;
- Our business contacts;
- Suppliers that either we or our clients use; and
- Professional bodies who regulate or supervise us, our insurers, auditors and professional advisers.

We have not written this privacy notice for the benefit of the following categories of people (for whom we have separate privacy notices):

- Our employees, past employees or anyone interested in working for us.
- Any clients to whom we provide a service as a data processor.

In the event that you believe we are processing personal information of yours, but you are not included in the above list, then please contact us so that we can investigate.

## What does this privacy notice cover?

Please read this privacy notice carefully as it contains key information about the following:

- The different types of personal information that we collect and use;
- The lawful bases we rely on to collect and use personal information;
- The reasons why we collect and use this personal information;

- The sources of the personal information that we obtain;
- The people and organisations we share the personal information with;
- The length of time we store information and how we ensure it is held securely; and
- The privacy rights you have in relation to the information that we collect.

This general privacy notice should be read alongside any specific privacy notice we may issue to you from time to time, in relation to your personal information.

### **How do we ensure compliance?**

We have a Data Protection Officer (DPO) who has been appointed to ensure compliance with our responsibilities when it comes to data processing. Our DPO is Harrison Riddle, Managing Director of Landreeve Ltd. He can be contacted by email at [harrison.riddle@landreeve.co.uk](mailto:harrison.riddle@landreeve.co.uk).

### **Which categories of personal information do we collect?**

We collect personal information including the following:

- Basic information including your name (including your salutation and any given titles or post nominals), the company that you work for, your position and how you are related to a person.
- Contact information including your correspondence address, email addresses and phone number(s).
- Client identification and background information provided by you as part of our anti-money laundering checking processes. This typically includes your date of birth and current residence, although it can include your previous addresses, passport number, National Insurance number and driving licence number.
- We may also collect information about the circumstances that led to you instructing or wishing to instruct us. This could include special category data if relevant to the matter we are working on for you and information about members of your family.
- We will also keep records of your contact with us such as emails, post and notes from phone calls.
- In the event that you are involved in one of our client's matters, we will collect information about you that is relevant to the matter which may include special category data.
- Financial information, such as payment bank account details and information relevant to funding.
- Technical information from when you visit our website, which could include information about the type of device you are using, your operating system and version, browser type, the content you view, the search terms you enter and your IP address and geographic location.
- Information that you provide to us through the interactive parts of our website including file uploads and the types of property you are interested in.

Where we collect or receive your personal information in the context of us providing you with a surveying or dispute resolution service, we may receive information from third parties such as your relatives, employees,

employer and other parties involved in the matter in respect of which we are acting (such as the other party in a transaction or dispute) or others such as regulators. The information we collect will be relevant to the service we are providing you and may include special categories of data where it is lawful for us to process it.

### How do we obtain personal information from you?

We collect personal information from a range of sources, set out below:

- Directly when you engage with us by filling in forms or requesting updates on our website or corresponding with us by post, phone, email or otherwise.
- We collect additional information when undertaking client checks in order to comply with our statutory and regulatory obligations or where such checks are in our legitimate business interests.
- We collect and generate personal information through the course of providing surveying or dispute resolution services and advice and possibly if we assist you with obtaining funding or insurance.
- We collect contact details and additional information from business contacts.
- We obtain information from publicly available sources such as H M Land Registry, the internet, news articles, social media, online forums and directories.
- We collect personal information while monitoring the performance of our website and also email and social media communications. This could be via cookies.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For information about our use of tracking devices and cookies, please refer to our Cookies Policy.

### What are the lawful bases that we rely on for processing personal information?

We process your personal information relying on the following legal bases:

<b>Performance of a contract</b>	This means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
<b>Legal obligation</b>	This means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
<b>Legitimate interests</b>	We may collect and use your personal information to further our legitimate business interests. We only do this where we are satisfied that your privacy rights are protected

satisfactorily. You have a right to object to any processing of your personal information based on this legal basis (see below).

**Establishment, exercise or defence of a legal claim**

This applies where we need to collect or use personal information to enable us to establish, exercise or defend a legal claim of our own or when we are working on matters for our clients or their customers.

**Consent**

We may (but usually do not) need your consent to use your personal information. You can withdraw your consent by contacting us (see below).

**Public interest**

Although we are not a public body, we do collect and use some personal information where this is necessary to perform tasks that are in the public interests.

### Why do we collect and use personal information?

We collect and use personal information for the following purposes, relying on the specific lawful bases set out in the table below:

**Why**

**The legal bases**

**To manage and administer our relationship with our clients and to provide surveying and dispute resolution advice and services to them**

Performance of a contract  
Establishment, exercise or defence of a legal claim

**To manage and administer our relationship with customers of our clients and to provide surveying and dispute resolution advice and services to them**

Legal obligation  
Legitimate interests  
Establishment, exercise or defence of a legal claim

**To undertake background checks on potential clients including checking identity and checks undertaken for anti-money laundering, anti-terrorism reasons, to avoid conflicts of interest, financial and reputational checks. We do not undertake any automated decision making, but we use credit reference and fraud prevention agencies who may do so**

Legal obligation  
Legitimate interests  
Public interest

<p>To assist our clients with obtaining funding and insurance to help them pursue their matters and for sourcing and obtaining financial products</p>	<p>Legitimate interests Consent</p>
<p>To assist our clients (or their customers) to obtain support with their matters from experts counsel, professional advisers and funders</p>	<p>Performance of a contract Legitimate interests Establishment, exercise or defence of a legal claim</p>
<p>To ensure that we provide excellent standards of client service through our own audit, review and quality assurance checks or by those undertaken by our clients, regulators, auditors, professional advisers and certification bodies</p>	<p>Legitimate interests</p>
<p>To manage and administrate our relationships with suppliers of good and services to us</p>	<p>Performance of a contract Legal obligation Legitimate interests</p>
<p>To make and manage client and supplier payments, including collecting payments due to us</p>	<p>Performance of a contract Legal obligation Legitimate interests</p>
<p>To look into any complaints or queries</p>	<p>Performance of a contract Legitimate interests</p>
<p>To otherwise carry out the day-to-day operations of our businesses efficiently including managing our financial positions, business capability, planning, communications, corporate governance and audit</p>	<p>Legal obligation Legitimate interests Public interest</p>
<p>To undertake activities designed to promote and market our services including sending out newsletters, legal updates, holding events and seminars, inviting you to enjoy our hospitality and hosting you, and keeping records of your interests in these activities</p>	<p>Legitimate interests Consent (where legally required)</p>

**To undertake on-line marketing activities including using a variety of digital and social media channels**

Legitimate interests  
Consent (where legally required)

**To provide “added value” services to our clients**

Legitimate interests

**To train and develop our staff and people who work for us**

Performance of a Contract  
Legal obligation  
Legitimate interests

**To run our corporate social responsibility programmes**

Legitimate interests

**To prevent and respond to actual or potential fraud or illegal activities**

Legal obligation  
Public interest

**To establish, exercise or defend our legal rights or for the purpose of legal proceedings in which we may be involved**

Establish, exercise or defend legal rights

We may also collate, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal information but it is not considered personal information as it does not directly or indirectly reveal your identity. For example, this could be to check the percentage of visitors to our website that click on a particular page.

However, if we combine or connect aggregated data with your personal information so that it can directly or indirectly identify you, then we treat the combined data as personal information which will be processed and used in accordance with this privacy notice.

### **Will we send you marketing communications?**

We do a number of things which are designed to build stronger relationships with our clients and business contacts, and to provide added value and market other services we believe may interest you. Although we want to keep you informed about beneficial services we can offer you, we don't want to send you unwanted marketing material or gifts. Consequently, we do our best to tailor the information we send out.

In order to do this we have to store information about your professional and personal interests and preferred methods of communication. We may also track your level of engagement with us including via our website to further tailor our marketing. Whilst we do not need your consent to collect and use personal information for

marketing reasons, as the data protection legislation recognises this is in our legitimate business interests, we are obliged to inform you that you have a right to object to this.

The law further provides for us to send marketing communications by electronic means to existing clients and business contacts without consent but, again, you have the right to object to this if you wish. If we send marketing communications (with or without consent), we will make sure to include a simple “unsubscribe” option. However, if you have any issues using this, or wish to find out more about how we have used your personal information for this activity, then please do not hesitate to contact us.

We do not intend to share your personal information with any company outside of Landreeve Ltd for marketing purposes but we would obtain your express prior opt-in consent before doing so.

### **Do we share your personal data?**

We do not sell, rent or otherwise make personal information commercially available to any third party. However, we may have to give access to or share your personal information with the parties set out below for the purposes outlined in the table above. Certain third parties may also collect personal data about you on our behalf in order for us to provide our services to you.

- Providers, who are themselves bound by obligations of confidentiality, who supply goods and services (such as IT and system administration services) and professional advice to us to help us run our business.
- Credit reference agencies who we use to help us undertake identity, adverse media and anti-money laundering checks.
- Third parties engaged in the course of us providing services to our clients such as other experts, counsel, solicitors, other professional advisors, funders and insurance brokers or providers.
- Third parties involved in our clients matter such as the other party in a transaction or litigation, their advisers and representatives, courts, tribunals and expert determiners, government and law enforcement agencies.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- We may in the future choose to use a telephone answering service, to provide switchboard services. As part of this service the provider will take personal details, included but not limited to contact details, about you to allow them to notify us that you have called us and so that we may call you back.

### **Can you choose not to give us your personal information?**

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, we cannot act for you unless we are able to check your identity, run a conflict of interest check and anti-money laundering checks). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.



## **How long do we retain your personal information?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We have developed a Data Retention Policy setting out the retention periods for different aspects of your personal data. We delete or destroy personal information securely in accordance with the Data Retention Policy. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **How do we keep your data secure?**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. If you wish to discuss the security of your information please contact us.

## **What are your legal rights in relation to your personal data which we have?**

You have the following rights with respect to your personal data, unless subject to an exemption under the data protection laws:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable 9i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Should you wish to exercise any of the rights set out above, please contact us using the details below.

#### **Have there been any changes to this privacy notice?**

This privacy notice was written on 07 February 2023. We will keep this privacy notice under review and may update it from time to time to reflect changes in the law and our privacy practices. We encourage you to check this privacy notice for any changes on a regular basis.

#### **Are there ways you can help keep your data secure?**

There is always a risk that written communication, particularly by email, may be intercepted by third parties. You should ensure that your personal computer and any other devices which you use to communicate with us on have the appropriate protection and security in place, with robust password protection and that all appropriate security updates are installed.

Please take care that any email you receive purporting to be from us is genuine. If you receive something that appears suspicious do not click on any links in the email, do not open any attachments, do not reply directly to the email and do not call the number noted in the email. Instead, please contact the surveyor who is dealing with your matter on the number quoted in the engagement letter.

Due to the increased risk of fraud and cyber-crime we recommend that you verify our bank details with us over the phone before making payment. At the very least we recommend that you ensure the bank details on any invoice we send you matches the bank details provided to you in our Terms and Conditions of Business.

Please also keep us informed if your personal data changes during your relationship with us (for example if your contact details change because you have moved house, or purchased a new phone and not ported your old number). This will ensure we do not send communications to your previous address.

Our website may include links to third-party websites, plug-ins and other applications. Clicking on those links or enabling those connections may allow such 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, which must be read separately.

### **How can you contact us regarding data protection?**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please contact our DPO Harrison Riddle in the first instance using the details below:

Landreeve Ltd  
13D The Stables  
Sansaw Business Park  
Hadnall  
Shrewsbury  
SY4 4AS

Tel: 07792 686284

Email: [harrison.riddle@landreeve.co.uk](mailto:harrison.riddle@landreeve.co.uk)

If this does not resolve your complaint you also have the right to complain to the Information Commissioner's Office (ICO). More information about this is available on the ICO's website available at [www.ico.org.uk](http://www.ico.org.uk).