

Privacy Notice

About us

Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd are an independent firm of Chartered Surveyors and Commercial Property Consultants and are engaged in the provision of the following service areas:

- Property Agency
- Valuation
- Development and Project Management
- Professional (Lease Renewals, Rent Reviews, Rating Appeals)
- Property Management Services

Robert Pinkus & Co. LLP & Robert Pinkus Property Management Ltd has its head office at:

16-18 Riversway Business Village
Navigation Way
Ashton-on-Ribble
Preston
PR2 2YP

Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd are proud to be an RICS accredited practice.

Robert Pinkus & Co. LLP & Robert Pinkus Property Management Ltd serve most major lenders, investors, developers, commercial businesses, corporations, local authorities, housing associations and the general public via our small but friendly team. Full details can be found on our website <https://www.pinkus.co.uk/our-company/>

Your Information

1 Types of information we collect

Typically Robert Pinkus & Co. LLP & Robert Pinkus Property Management Ltd collect the following information when welcoming you as a new client or accepting you as an 'applicant' for the purposes of assisting you with your property requirement or to schedule viewings with you.

Applicants:

1. Title
2. First name
3. Middle name
4. Surname
5. Email address
6. Postal Address
7. Telephone numbers
8. Company name
9. Nature of business
10. Property types of interests/size/budget/areas/tenure
11. Company size
12. Sources of funding
13. Payment methods
14. Date of birth
15. Future communication preferences
16. Telephone number and voicemail recordings when you call our phone line

Clients/Employers & Tenants/Purchasers:

1. Title
2. Client/Employer Name/Registered Company Name (individual or Ltd Co. etc.)
3. Client/Employer Address
4. Client employer/nominated contact email address/addresses
5. Trading names
6. Company incorporation number (s)

7. Any relevant personal address/addresses
8. Nominated contact details (if applicable)
9. Job Title
10. Relationship details to Client/Employer
11. Company size
12. Department
13. Company website
14. Property address/addresses
15. Tenure information
16. Landlord Details
17. Tenant Details
18. Sources of funding
19. Payment methods
20. Future communication preferences

2 Collection methods

In the general conducting of business, Robert Pinkus & Co. LLP & Robert Pinkus Property Management Ltd collects information relevant to the services being sought across the range of services it offers (listed previously) from:

- The Robert Pinkus & Co. LLP & Robert Pinkus Property Management Ltd Website
- “trusted” sources including Property Portals (i.e. Zoopla/CoStar Focus etc. where you provide details to access information relating to property searches
- through consent to third parties disclosing information about you to us that they have collected

Such information will generally be collected directly via the use of any of our standard forms over the internet, via email, in our offices or through a telephone conversation with you. We may also collect personal information through our affiliates or suppliers. In addition, you may choose to submit your information/enquiry directly to us via several methods, including:

- through Robert Pinkus & Co. LLP & Robert Pinkus Property Management Ltd and affiliates websites (i.e. Zoopla)
- in response to marketing or other communications
- through social media

- by signing up for a Robert Pinkus & Co. LLP & Robert Pinkus Property Management Ltd product or service
- through participation in an offer, program or promotion such as a prize draw
- in connection with an actual or potential business or employment relationship with us
- at events, conferences, and seminars

You may also agree to third parties disclosing information about you to us that those third parties have collected.

We use Google Analytics to help us analyse how visitors use our websites and apps.

The "Your rights" section of this Privacy Notice specifies your ability, to opt out or limit the usage of the information collected.

3 Purposes of collection

Robert Pinkus & Robert Pinkus Property Management Ltd process information under the bases of legitimate interest. When you contact us to request materials, we will use your personal information to fulfil your request as follows:

- Accepting and assessing applicants and providing Robert Pinkus & Co. LLP & Robert Pinkus Property Management Ltd products / services
- Conducting business, developing relationships with Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd and affiliates
- Process payments / transactions including: Accounting, Authorisation, Auditing, Billing, Reconciliation, Collection, Complaints, Enquiries, Credit Checks and related dispute resolution activities
- Protect against and prevent fraud, unauthorised transactions, money laundering (please see below), tax evasion, claims, other liabilities and manage risk exposure and agent /franchise quality, integrity, compliance and security of business processes
- Provide, administer and communicate with you about Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd products, services, offers, programs and promotions, their issuers, acquirers, retailers and partners.

- Compile internal business directories and lists, including business contact information
- Operate, monitor, evaluate and improve our products, services, websites and business services.
- Developing new products and services to our offering
- Managing communications, assess effectiveness and optimisation of advertising
- Functionality of our website
- Evaluate your interest in employment and contact you regarding possible employment opportunities
- Enforce Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd “Terms of Engagement”, other legal rights as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd or its affiliates.
- Comply with industry standards and Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd policies
- In order to provide focussed marketing and information to you.

Anti-Money Laundering

In addition to help you with a property related service we have to comply with certain regulations for example the “Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to as “the Regulations).” Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd are required to obtain certain information from you to comply with regulations. The information provided will only be used by Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd in relation to complying with the Regulations and will not be shared with any other party unless we are required to do so under law.

If you decide to enter in to a business relationship with Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd to comply with the aforementioned regulations;

We will require two separate Identification documents one primary and one secondary document even if it appears on both lists whether you are:

1. A new Client
2. Purchaser/Vendor/Landlord/Owner

Primary documents - proof of ID:

- Valid Passport with MRZ
- Valid full UK photo driving licence
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Valid EU/EEA/Switzerland photo driving licence.
- Valid EU/EEA/Switzerland national Identity Card.
- Valid UK Armed Forces ID Card.
- Valid UK Biometric Residence Permit (copy of both sides.)
- Valid Blue disabled drivers pass. (With photo)
- Valid Freedom Pass
- Valid Local Authority Bus pass.
- Department for Works & Pensions letter confirming pension details including
- National Insurance Number dated within the last 12 months.

Secondary documents - proof of address

- Valid full UK photo driving licence.
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Local authority council tax bill (dated within the last 12 months).
- UK Bank / Building societies statements/bills showing activity, dated within the last six months. Including account number and sort code. (Internet printed acceptable.)
- UK mortgage statement (dated within the last 12 months.) (Internet printed acceptable.)
- Utility bill dated within the last 6 months including - Electricity bill

We employ a third party electronic verification for the purpose of verifying identity. This search will not affect your credit rating, though it will leave a footprint on your credit file.

4 Lawful basis of processing

Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd process your information under the following:

- Performance of a contract: where you enter into a contract with Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd and we need to process your information as part of this contract
- Legitimate interests: some information is processed by Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd as part of its legitimate interests

which include: Fraud, risk assessment, due diligence, network and information security, suppressions and managing opting out of communications, profiling, direct marketing, monitoring, web analytics, cloud storage, acquisitions, updating customer details, lettings, sales, financial services and other core products and service provided by the data controller

- Public interest: some information is processed in accordance with public interest such as relocations
- Consent: where we process information under consent we will seek your clear and unambiguous consent prior to processing your data

5 Protection of your information

The security of your personal information is very important and Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd are committed to protecting the information we collect. We have implemented administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd stores personal information only for as long as it is necessary and for the fulfilment of the purpose for which the personal information was collected. We limit access to personal information to those who have a genuine business need, unless otherwise required or authorised by applicable law.

6 Information we share

We never sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- When we have received instruction to pass the sale, letting or management of your property to another agent
- When we contractually require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements

- In the general conducting of our business where we have the need to pass on information to vetted affiliates and partners such as lawyers/financial institutions/accountants and insurance companies to facilitate property transactions as instructed by you
- To enable us to comply with RICS and other statutory legislation
- Councils, health and care providers
- Other Law firms
- Credit agencies, Land Registry Office, Her Majesty's Revenue and Customs (HMRC), Financial Conduct Authority (FCA) and other relevant regulatory bodies

Additionally, we may share information about you, if required legally:

- to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities.
- Perspective employers requesting references via your written consent

On websites, features may be accessed where we partner with other entities that are not affiliated with Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd. These include social networking, geo-location tools etc. and are operated by third parties (indicated appropriately) who may use or share personal information in accordance with their own privacy policies. It is recommended that you review the third parties' privacy policies if you use the relevant features.

7 Information Retention Period

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep your information for as long as necessary. We generally keep personal information for 12 years after last contact with you. However Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd reserves the right to keep information for longer if we feel that this is in the legitimate interests of Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd.

8 Profiling

For the purposes of business conduct, enhancement, identification of fraud, money laundering and other potential un-authorised activities, Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd engages profiling activities via direct use or anonymisation of sensitive personal information.

8.1 Direct profiling

Direct profiling is engaged for the fair and lawful purposes, to provide Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd the ability to enforce Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd "Terms of Engagement", legal reporting as may be required by applicable laws, regulations, policies / standards or requested by any judicial process or governmental agency having or claiming jurisdiction over Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd or its affiliates; including, but not limited to:

- Benchmarking employees: appraisals, performance, bonus payments, disciplinary actions, improvement plans, promotions and awards.
- Background checks for existing or new employees, clients, business partners or affiliates
- Financial Viability analysis / reports
- Business partner / client portfolio position, performance, risk positions
- Anti-money laundering
- Tax reporting
- Credit defaulting / exposure

8.2 Indirect profiling

Indirect profiling via anonymisation of personal information is also used for preparing and furnishing aggregated data reports showing anonymised information, including, but not limited to, the following:

- Compilations, analyses, analytical and predictive models and rules, and other aggregated reports for the purpose of advising our partners / affiliates and servicing institutions, retailers and other customers regarding past and potential future patterns of service usage, spending, fraud, and other insights that may be extracted from this data.
- Compiling and communicating promotional and marketing information about products and services that Robert Pinkus & Co. LLP and Robert Pinkus

- Property Management Ltd, affiliates and other organisations that we have affiliations with have and that may be of interest to you.
- Conducting market research
- Facilitating our internal business operations, including the fulfilment of any legal requirements.

9 Your Rights

9.1 Your rights of access and correction

Your rights regarding the sensitive / personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information, and how we communicate with you.

You may have the right to:

- obtain confirmation that we hold personal information about you
- request access to and receive information about the personal information we maintain about you
- receive copies of the personal information we maintain about you

The right to access personal information may be limited in some circumstances by local law requirements. To exercise these rights, please contact us as set forth below.

9.2 Update and correct inaccuracies in your personal information

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to information we hold about you.

9.3 Object to the processing of your personal information

If you would like to object to any processing of your information by Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd you can contact us outlining what processing of information you would like to object to.

9.4 Have the information blocked, anonymised or deleted.

If you would like Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd to delete, block or anonymise information we hold about you. You can contact us outlining what information you would like deleted, blocked or anonymised.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please email sarah@pinkus.co.uk

9.5 Opting out of processing

You can opt out of collection of personal information by automated means when interacting with our website, it's forms and any subsequent mailings to you.

We have a Cookie Consent tool displayed on the website when it is first accessed on any new device (the browser you use may provide options on how to opt out of receiving certain types of cookies). However, without cookies you may not be able to use all of the website features and/or online services.

You have the right, at any time, to have your details removed from our systems whether we have contacted you for either;

1. Marketing or promotional purposes relating to our business /services
or
2. Directly in relation to a property requirement you have made to us

We ask for your consent on all of our web forms in relation to storing and sharing your information in the way of tick boxes which you should consider before submitting to us.

Email Communications

You can stop receiving promotional material or marketing material via email at any time by advising us in writing by email or post.

You can use the link at the foot our mailings to opt in/out or completely unsubscribe yourself from our property mailings. We will only mail shot you properties where you have given us permission to do so and only those which match with your requirements which you have provided to us.

You can also update your requirements and close your enquiry at any time by using the “update your preferences” link on our mailing emails which are titled “Your Property Search”.

Postal communications

You can stop receiving promotional material or marketing material by post at any time by advising us in writing by email or post.

Telephone Communications

You can ask us, whenever we call you, to be removed from our database and we will close your enquiry/remove your contact details within 48 hours.

9.6 Withdrawal of consent

If we obtain your information by consent you have the right to withdraw any consent you previously provided to us.

If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information.

Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd we will apply your preferences going forward. Doing so will mean that you cannot take advantage of certain Robert Pinkus & Co. LLP and Robert Pinkus Property Management Ltd and affiliate products, services and promotions.

The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.

On receipt of this request we will remove your personal data from our CRM system and all email marketing will cease within 48 hours.

10 Contacting us

10.1 Complaints

If you wish to make a complaint about a breach of your personal information, applicable privacy laws / principles or have a concern about Robert Pinkus & Co. LLP and Robert

Pinkus Property Management Ltd privacy practices, or would like access and/or update information or preferences you provided to us you may e-mail us at: sarah@pinkus.co.uk

Or write to us at: Sarah McGee – Data Controller
Agency Support & Compliance
Robert Pinkus & Co. LLP
16-18 Riversway Business Village
Navigation Way
Preston
PR2 2YP

10.2 Feedback

If we fall short of your expectations in processing your personal information or you wish to make a complaint about our privacy practices, please contact us as above.

To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time.

If we cannot for lawful reasons complete your request we will explain this to you to the extent that we lawfully can.

11 Updating this Policy

We will update this statement from time to time so we suggest that you review this statement at regular intervals. Where we undergo substantial changes to our privacy statement we will endeavour to inform you directly about these changes.