

## **Mawson Collins Ltd**

### **Privacy Notice - May 2023**

Mawson Collins Limited (the **Company**) is committed to ensuring that your privacy is protected in accordance with applicable data protection legislation, including the Data Protection (Bailiwick of Guernsey) Law 2017 (the **Law**).

This notice sets out the basis upon which personal data we collect from you, or that others provide to us, will be processed and held by us.

### **How we obtain information about you**

We may collect and process the following information or data about you:

#### ***Information you give us or that we may collect from you***

You may give us information about you by completing forms on our website or by corresponding with us by phone, email or otherwise or by providing documents to us such as your passport or a utility bill .

The information you give us may include your name, title, date of birth, address, email address, phone number or other contact information, username, password, financial details, and the records and contents of any correspondence and communications you have with us or any feedback which you leave for us.

It may also be necessary for us, in relation to specific matters, to request personal information revealing an individual's health data (**Special Category Data**), in which case we will only do so for the purposes as stated below.

Our website and mobile applications are operated on our behalf by Expert Agent ([www.expertagent.co.uk](http://www.expertagent.co.uk)).

Each time you visit our site, it may use Cookies (temporary files added to your computer) to automatically collect the following information:

- Technical information, including but not limited to the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, identification number, online identifier, location data and other similar identifying information required for your devices to communicate with websites and applications on the internet;
- Information about your visit, including but not limited to the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); pages you viewed or searched for; 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 and any phone number used to call us;

The Company may collect and report on the adoption and usage of specific features, crashes and exceptions and other useful, anonymous metrics.

- In addition, we receive anonymised reports of website activity ('hits') via Google Analytics. You can click here to learn more about [Google's Privacy Policy](#).

### ***Information we receive from other sources***

- We may also work with third parties, for example credit reference agencies, or Banks to obtain financial and credit status information about you from them, your employer, to obtain a character reference, and governmental services or charities where the provision of social and health care may be an issue.
- Information provided by other individuals or organisations in the course of acting for you or another client, for example where act as a property manger.

### **How we use your information**

We will use the information you give us for legitimate business purposes only, as follows:

- To provide the services you request from us pursuant to our terms of business or to provide such services on behalf of another client, for example where we act as a property manager. This may include disclosure of your information to third parties engaged by us, for example, where we buy, sell or let a property for you, in which case we may disclose your data to the prospective landlord or buyer, or their professional advisors or to our service providers, for example our bank when engaged in the setting up of a payee's bank details;
- To enable us to comply with our legal and regulatory obligations;
- Where the processing is necessary for the legitimate interests of the Company, including those stated above and:
  - i) As part of our efforts to keep our site safe and secure and to prevent or detect fraud;
  - ii) To help enforce or apply our terms of business or other agreements or protect the rights, property, safety and financial interests of the Company, our clients, or others. This includes providing information to statutory agencies for the purposes of fraud protection and working with third parties, for example credit reference agencies and/or banks to obtain financial and credit status information about you from them.

### **How we store and handle your information**

The information we collect from or about you is held in hard and/or soft copy in Guernsey in our files or on our private business servers located in Guernsey or transferred to a Cloud-based hosting facility, for which data is stored in the United Kingdom or the European Union and Iceland.

The United Kingdom is an authorised jurisdiction for transfers as it has been deemed adequate by the European Commission. Although Iceland is not an EU Member State, it is treated as such for data protection purposes.

In the event of a transfer of personal data to third parties, such as those located outside of Guernsey and the EU, which may not have the same data protection laws as Guernsey, the Company will only transfer such data to another jurisdiction if it is necessary in the context of our providing the services explained above, including taking steps at your request prior to entering into such a contract.

Where personal data is required to be transferred to another jurisdiction which may not have equivalent data protection laws to Guernsey, appropriate safeguards will be applied in accordance with the Law.

Our current data retention policy is 6 years from the termination of the contract or conclusion of the services we have provided.

### **Your rights**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information we hold about you.
- Right of rectification – you have a right to correct data we hold about you that is inaccurate or incomplete.
- Right to erasure – in certain circumstances if you no longer wish to be contacted by us, you may email [info@mawsoncollins.com](mailto:info@mawsoncollins.com) or write to us heading your communication ‘GDPR – Unsubscribe’ and this request will be processed as quickly as practicable.
- Right to restriction of processing – where certain conditions apply, you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing, grounds of public interest, or historical or scientific purposes.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to complain - in the event the Company refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.
- Right to be notified of rectification, erasure and restrictions on processing.
- Right to be subject to decisions based on automated processing.

All of the above requests will be forwarded on to any third parties involved in the processing of your personal data but we cannot ourselves enforce any request received.

Enforcement powers are vested in the Office of the Data Protection Authority (the **Authority**) operating under the Law.

### **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by the Company (or third parties as described above), or how your complaint has been handled, you have the right to lodge a complaint directly with the Authority and **Mike Collins** at the Company.

The details for the Authority are:

Office of the Data Protection Authority  
St Martin’s House  
Le Bordage  
St Peter Port  
Guernsey GY1 1BR

Tel +44 (0) 1481 742074

## **Appeals**

You also have a right to appeal in respect of the conduct or determination of the Authority in certain circumstances. You should take your own legal advice in this regard at the time.

## **Right to Withdraw Consent**

Where you have provided your consent to processing (e.g. to receive information about products and services which may be of interest to you), you may withdraw your consent at any time by contacting [info@mawsoncollins.com](mailto:info@mawsoncollins.com)

## **Failure to Provide Personal Information**

Where the Company requires your personal information to comply with AML or other legal requirements, failure to provide this information means the Company may not be able to assist you.

## **How to contact us**

If you have any questions about our use of your personal information, please contact us at [info@mawsoncollins.com](mailto:info@mawsoncollins.com)