

Mawson Collins Ltd

Privacy Notice - May 2018

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. 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.

None of the personal data we collect is special category data as defined in the Law.

Our website and mobile applications are operated on our behalf by Expert Agent (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.
- 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 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 verify your identity and source of wealth to enable us to comply with our legal and regulatory obligations;
- Where the processing is necessary for the legitimate interests of the Company, including:
 - i) As part of our efforts to keep our site safe and secure and to prevent or detect fraud;
 - ii) To comply with the Law;
 - iii) 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 may be held in hard and/or soft copy in Guernsey in our files or on our private business servers or transferred to a Cloud-based hosting facility typically located outside of Guernsey.

Our current data retention policy is 7 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 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 Mawson Collins Ltd 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 Data Protection Office 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 supervisory authority in Guernsey and either **Howard Mawson** or **Mike Collins** at the Company.

The details for the Supervisory Authority are:

Office of the Data Protection Commissioner
Data Protection Office
Guernsey Information Centre
North Esplanade
St Peter Port
Guernsey GY1 2LQ

Tel +44 (0) 1481 742074

Appeals

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