

Welcome to Jacobs Steel & Company Limited and Jacobs Steel Lettings Limited (hereafter referred to as “Jacobs Steel”, “We”, “Us”, “Our”) privacy notice.

Jacobs Steel aim to provide our customers and clients with the best possible safe and secure service. We are committed to protecting and respecting your privacy. We use the personal information you share with us to tailor our services to your requirements; and to provide the best possible user experience on our website jacobs-steel.co.uk and social media platforms.

The purpose of this privacy policy (hereafter “Policy”, “Privacy Notice”) is to give you a clear explanation about how Jacobs Steel use, store, share and control the personal and behavioural information you provide (or that we collect from you) when you contact us or otherwise engage with us via our website or other media. This can be done in a variety of different ways, which can include but are not exclusively limited to:

- in person via our office
- by telephone
- by post
- by SMS
- by email
- live web chat
- social media
- via our website
- via third party websites (if appropriate)
- via property portals such as www.rightmove.co.uk, www.zoopla.com, www.onthemarket.co.uk

By engaging the services of Jacobs Steel or by visiting our website you are accepting and consenting to the practices described in this policy.

This privacy notice will tell you about your privacy rights and how the law protects you. All your personal data shall be processed in accordance with the Data Protection Act 2018, together with any legislation that replaces it in whole or in part.

Please use the glossary to understand the meaning of some of the terms used in this policy.

1. Important information and who we are Purpose of this privacy notice

This privacy notice aims to give you information on how Jacobs Steel collects and processes your personal data through your use of our website, including any data you may provide through the website when you engage our services or when you engage or use our services.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Jacobs Steel is the controller and responsible for your personal data

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this

privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

Our full details are:

Full name of legal entities: Jacobs Steel & Company Limited and Jacobs Steel Let-tings Limited Email address: DPO@jacobs-steel.co.uk

Postal address: 54 Chapel Road, Worthing, West Sussex, BN11 1BE

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated in February 2020 and supersedes any earlier versions.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. 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 statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

As a business we collect, use, store and transfer different types of personal data depending on who you are. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

If you are purchasing or selling or letting or renting a property through Jacobs Steel, or purchasing or selling or letting or renting a property from one of our clients, we collect and use your personal data in order for us to provide you with our services. The personal data we collect and use may include:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and proof of residency.
- **Contact Data** includes correspondence address, email address and telephone numbers. Employment Data includes employment and income information (for qualifying potential tenants for properties).
- **Financial Data** includes bank details and credit search history (for qualifying potential tenants for properties).
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Property Entry Data** includes details about keys and alarms at the property
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage

Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can ask us to rectify or update your personal information at any time by email to the data protection manager at the details listed above.

If you fail to provide personal data

Where we need to collect 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, to provide you with our services). 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.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions

You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Enquire to receive information about properties listed on our website or related portals such as Rightmove and On The Market;
- Walk in to any branch office or telephone us;
- Register as a potential property purchaser;
- Register as a potential property seller;
- Register as a potential Landlord;
- Register as a potential tenant;
- Subscribe to our service or publications;
- Request marketing to be sent to you;
- Contact us through social media;
- Enter a competition, promotion or survey; or
- Give us some feedback.

Automated technologies or interactions.

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

Third parties or publicly available sources.

We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- analytics providers such as Google Analytics based outside the EU;
- advertising networks
- search information providers Contact, Financial and Transaction Data from providers of technical, payment and delivery services

Identity and Contact Data from data brokers or aggregators such as:

- Rightmove based inside the EU;
- On The Market based inside the EU;
- Zoopla Property Group based inside the EU;
- Facebook group of companies based outside the EU;
- LinkedIn based inside and outside the EU.

Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered in to with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. This may include:
 - passing the names of new tenants to utility companies;
 - disclosing details of a tenant who has left leaving rent arrears to a tracing agent or debt collector to help them recover money owed;
 - passing on forwarding addresses of former tenants to utility companies;
 - providing tenant's contact details to repairers or contractors in relation to repair or maintenance work that needs to be carried out;
 - informing the guarantor where the tenant has failed to pay rent
 - Where we need to comply with a legal or regulatory obligation. This may include the right to rent legislation or gas safety requirements

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting the data privacy manager.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact the data privacy manager if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a potential buyer or seller or landlord or tenant of property	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To carry out our obligations arising from any contracts entered into between you and us and to provide with you the information, products and services you request from us such as information contained in Property Match emails	(a) Identity (b) Contact (c) Profile (d) Marketing & Communications (e) Property Entry Data (f) Employment Data (g) Financial Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for running our business and providing you with our services)
To permit selected third parties: •to provide you with information about services which we feel may interest you •to assist us in the improvement and optimisation of advertising, marketing material and content, our services and the website	(a) Identity (b) Contact	(a) Consent (in relation to SMS and email marketing communications) (b) Necessary for our legitimate interests (to develop our service offering)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

5. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

Where required we may share limited personal information you provide when you register with us or enter in to a transaction with us, as necessary and only for the purposes and on the lawful grounds de-scribed above with various third parties who process your personal information on our behalf (Data Processors) including software and system providers, including but not limited to Jupix. Website Hosts and analytics platform providers including but not limited to PMW, Brief Your Market, Google Analytics, Google Ads & The Google Display Network.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time clicking on the “mange your preferences” or unsubscribe” link in emails and unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting the data privacy manager at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

If you do withdraw your consent to receiving marketing messages, we will still process your personal data in order to fulfil our contract with you and in accordance with our legal, accountancy and regulatory obligations.

If you no longer wish to be contacted by third parties for marketing purposes, please follow the instructions in their marketing communications, or consult their privacy policies about how to unsubscribe.

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.

Change of purpose

We will only use your personal data for the purposes for which we collected it, 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 the data privacy manager.

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 knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- 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 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 and in accordance with our instructions.

7. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

8. Data security

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.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We have 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.

9. Data retention

How long will you use my personal data for?

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.

By law we have to keep basic information about our customers (including Contact, Identity and Financial Data) for

six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

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.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact the data privacy manager.

No fee usually required

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 fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

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.

Time limit to respond

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.

11. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting the privacy manager

Performance of Contract 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. **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based in the United Kingdom who provide IT and system administration services, anti-money laundering service providers and other services to enable us to perform our contract with you.

- Professional advisers acting as processors or joint controllers including lawyers, financial advisers, surveyors, professional photographers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Mortgage Advice Bureau acting as processor or independent controller who provides mortgage brokerage services (where you have consented for us to do so).
- Property developers acting as processors or independent controllers based in the United Kingdom who process your personal data in order to arrange and facilitate your visit to their marketing suite.
- Solicitors acting as processors or independent controllers based in the United Kingdom who process your personal data in order to advise you in relation to the sale or purchase of property (where you have consented for us to do so).
- Financial advisors acting as processors or independent controllers based in the United Kingdom who process your personal data in order to advise you on financial matters.
- Surveyors acting as processors or independent controllers based in the United Kingdom who process your personal data in order to provide you with surveyor services.
- Landlords and necessary third parties such as contractors, utility management companies, tenancy deposit protection companies, credit and referencing agencies, inventory providers, banking organisations to assist in the maintenance and other services related to a leased property.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

