



## **WBM Privacy Policy**

### **Introduction**

WBM Commercial Property Limited are committed to maintaining the trust and confidence of our clients, applicants, fellow agents, visitors to our website and all those who access our services. WBM Commercial Property Limited has not (and never will) sell, rent or trade email lists to other companies, agencies or businesses for marketing purposes. We will only use our marketing lists for legitimate business purposes. In this Privacy Policy we have provided information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

Any questions regarding this policy and our privacy practices should be sent to [info@wbmproperty.co.uk](mailto:info@wbmproperty.co.uk). Alternatively, please call our office on 01793 232658.

### **Who we are?**

WBM Commercial Property Limited (WBM), are a UK based RICS regulated firm of chartered surveyors & commercial property consultants providing commercial property advice.

We are registered with the Information Commissioner's Office and our registration number is ZA447937.

### **How we collect your personal data**

We primarily collect your personal data in one of two ways:

- When you contact us, either verbally or by letter or by e-mail or via the contact form on the website, to request details, register interest or instruct us to provide a product or service for you, we need to know your name, postal and e-mail addresses and telephone number. We may also collect further personal data from you during the course of providing our services to you.
- If you apply to work for WBM either as employee or consultant, we may need to collect other personal information from you, such as existing employment history and salary, educational history, professional qualifications and training.

We gather this information to allow us to process your application, registration, enquiry, or any orders for products/services you may make and any offers you make for a property. The relevant information is then used by us, our agents and sub-contractors to provide any services requested by you and to communicate with you on any matter relating to the provision of the service(s) in general.

WBM securely stores personal data both electronically and in paper form.

### **How is your personal data used?**

Depending on your relationship with us, we may use your information for the following purposes:



- **Mailing Lists**

- To send you information regarding property sales and lettings
- To provide you with property market research emails
- To provide you with news and information about WBM Commercial Property Limited and our services.

When we electronically send marketing material or a newsletter these are sent 'in house'. We do not gather statistics around email opening and clicks.

You can unsubscribe to any of our general mailings by simply responding to any email from us and replacing the title field with 'Unsubscribe'. You will then be omitted from further mailings and you have the right to ask for your data to be erased.

## **Anti-money Laundering**

We have a legal requirement to check and confirm the identity of individuals and businesses and to establish the beneficial owners of a business or transaction. This includes but not limited to a client wanting to appoint us, tenant/prospective tenants, purchasers and vendors.

In order to comply with the requirements of the Anti-Money Laundering regulations, we may be required to obtain evidence to verify your identity. This may be physical documents and copy documents requested from you or by electronic search. The required documents may include copies of passport, driving licence, and proof of address or other identification documents. We will retain this information for the duration of any negotiation and for seven years post completion of the transaction or service or other such amended or extended period that the legislation requires.

## **CCTV**

Some of the properties we manage have CCTV in operation. On behalf of our clients we may as necessary use CCTV footage in the undertaking of our services. We have access to CCTV systems on sites where it is present and via a mobile app, to view incidents as and when we deem necessary. Footage or extracts from it will be used when necessary in the provision of our contracted services and be forwarded on to comply with Contracts we have in place or Legal requirements.

## **Retention of personal data**

In general we will retain account information for 12 years from termination of an instruction or dealings with a particular client. Information relating to a service or instruction will generally be kept for six years following the completion of that work.

We will retain business and contact information relating to our clients for the duration of our relationship and an amount of time once the relationship has ended. This period may vary depending on the type of client and work we have performed.



If you would like to request to have any personal data removed from our systems, please see the next section on “Your Rights Under GDPR”.

## **Your Rights Under GDPR**

Data protection law gives you rights to help you understand and control how personal data about you is used. For further information about the rights available to you, please see: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to make a request in relation to any of these rights, please contact us at: [info@wbmproperty.co.uk](mailto:info@wbmproperty.co.uk)

You also have a right to complain to the Information Commissioner’s Office (ICO) should you have any concerns about the handling of your personal data. For further information, please see: <https://ico.org.uk/make-a-complaint/>

## **Who we share your personal data with**

WBM may also be asked on occasion to share specific information with law enforcement, government agencies or public bodies – this can be a legal requirement. Examples of this may include, but not limited to:

- The prevention, investigation and detection of crime, fraud and misrepresentation;
- The apprehension/prosecution of offenders;
- The assessment or collection of taxes or duty owed to HMRC;
- In connection with legal proceedings.

In relation to our Anti-Money Laundering obligations, for any services we provide and for any letting or sales transaction that we are involved with, you give us consent to undertake the required checks via SmartSearch, a third-party search tool, that enables us to undertake electronic checks of individuals and companies. SmartSearch uses data powered and held by Equifax, Dow Jones & Experian. We will share this data where we are legally required to do so. If consent is not given we would be unable to act for you and any sale or letting transaction could not proceed.

## **Website**

Our Website is hosted via Site Ground on a Wordpress platform. Other than functional cookies we don’t use website cookies to collect or hold any information.

## **Security**

We hold physical and electronic files that will contain details such as names, email address & phone numbers. These files are kept for the necessary amount of time, in a secure location. We then dispose of



this information securely. Our appointed IT Company recommend and provide anti-virus software and other such software to ensure our networks are secure. However, whilst reasonable precautions have been taken to ensure that any electronic emails or correspondence and any attachments are free from viruses or other malicious code, no guarantee is implied or given.

### **Update and review**

DATE REVIEWED/UPDATED	COMMENTS	APPROVED BY
06/09/19	Updated for upload to new Website	AJB