



Privacy Notice

The following information constitutes our privacy notice. In this document, "we", "our", or "us" refer to Finlay Graham Property Ltd.

Our registered office is at 40 University Street, Belfast, BT7 1FZ.

You can contact us by e-mail about privacy at contact@finlaygrahamproperty.com.

Introduction

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We take seriously the protection of your privacy and confidentiality. We understand that you are entitled to know that your personal data will not be used for any purpose unintended by you and will not accidentally fall into the hands of a third party.
3. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
4. Our policy complies with the Data Protection Act 2018 (Act).
5. The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org
6. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website or otherwise.

Personal information we may process

We aim to process data, whether personal data or not, only to the extent necessary for us to provide our clients with our services and for other agreed purposes.

Often, we may aggregate information in a general way and use it to provide class information. If we use it for this purpose, you as an individual will not be personally identifiable.

Personal information that we may process may include:

Client information

If you are a client, personal information may include your identity and contact information, information about your family members, and financial information.

We may also process information deemed to be “special category” information, such as your race or ethnic origin, and information about criminal records.

In most cases, your personal data will have been provided to us by you. However, with your consent, or if it is necessary in order to provide you with our services, we may have obtained your personal data from a third party source.

Related third party information

We may process your personal data if you have a personal or business connection with any of our clients or suppliers. For example, you may be a family member, business partner, other adviser, supplier, or transaction counterparty.

The data we process may include contact information, information about your business activities, and financial information such as that relating to income and expenses.

We may be given your personal data by our clients or suppliers, or by third parties acting on the instructions of a client or a supplier.

Supplier information

If you supply our business with goods or services, including subcontracted services that we supply to our clients, then we may process your personal information. However, we do so only to the extent necessary to contract with you.

The bases on which we process information about you

The law requires us to determine under which of six defined grounds we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

7. Information we process because we have a contractual obligation with you

When a contract is formed between you and us, in order to carry out our obligations under that contract we must process personal information.

As examples, a contract between us could be formed by:

- your signing an agreement to allow us to act as agent for you
- your signing an agreement to allow us to carry out services required in order to let or to buy a property
- your agreement to our terms and conditions when you register on our website

We use your information in order to provide you with our services under that contract, for example:

- to help you find properties, prospective buyers or tenants
- to verify your identity for security purposes
- to carry out credit checks and to obtain personal references
- to provide other parties with whom you have expressed interest to contract and their representatives with sufficient information to make a decision as to whether to enter into a contract with you, and then to enter into a contract with you
- to negotiate on your behalf

- to provide you with advice
- to pay rent we have collected into your bank account

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

8. Information we process with your consent

Only when you have given us explicit permission to do so, do we process your personal information under the basis of consent.

For example, you might have agreed that we may track your actions on our website or pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by telling us. However, if you do so, you may not be able to use our services further.

9. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest of doing so, either to you or to us.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business
- responding to communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

10. Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

Specific uses of information you provide to us

11. Communicating with you

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

12. Dealing with complaints

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

If the complaint relates to information on our website and we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

We may compile statistics from information relating to complaints to assess the level of service we provide, but not in a way that could identify you or any other person.

13. Office visitors

Closed circuit television (CCTV) may be used at our premises and surrounding area in order to deter and to help investigate crime.

We process personal information including images and behaviours on the basis of legitimate interests.

This information may be shared with the data subject, our employees and agents and the police.

Our landlords and their agents may also use CCTV.

14. Customer relationship management system

We use a customer relationship management (CRM) system to process personal data.

Data subjects include existing, former and prospective clients and their agents and representatives.

Personal data that we process includes the name of the person, information about his or her employer and job position, and contact information.

We process this data on the basis of consent for purposes that include:

- managing and developing our business or services
- informing clients and prospective clients about our services
- determining relationships between clients and our partners and employees
- analysing whether we provide clients with a high level of service

We do not sell or share any personal data with third parties unless we have explicit consent to do so from the data subject.

15. Job applications and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

Use of information we collect through automated systems when you visit our website

16. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience, and the website owner with statistics about the actions you have taken.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- 16.1. to track how you use our website
- 16.2. to record whether you have seen specific messages we display on our website
- 16.3. to provide a consistent personalised experience across our site
- 16.4. to record your answers to surveys and questionnaires on our site while you complete them
- 16.5. to record the conversation thread during a live chat with our support team

17. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information that could identify your location, such as your IP address. We also record information reported by the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not

signed in to our website. However, our policy is not to use such data for the purpose of personal identification.

18. Our use of re-marketing

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our services when you visit some other website.

An advertisement that you see for our services may have been shown because we have used a third party to provide us with re-marketing services. However, we advertise in many places and an advertisement shown for our services may be coincidental to your visit to our website.

Disclosure and sharing of your information

19. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

20. Third party advertising on our website

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

21. Data may be processed outside the European Union

Our websites are hosted in the United Kingdom.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly, data obtained within the UK or any other country could be processed outside the European Union.

We use the following safeguards with respect to data transferred outside the European Union:

- 21.1. the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
- 21.2. the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union [, specifically that in the country of ...]
- 21.3. we comply with a code of conduct approved by the supervisory authority in the United Kingdom.
- 21.4. we are certified under an approved certification mechanism as provided for in the Act.

Management of your information

22. Access to your personal information

- 22.1. At any time you may review or update personally identifiable information that we hold about you.
- 22.2. To obtain a copy of the information we hold about you, please contact us.
- 22.3. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

23. Removal of information

If you wish us to remove personally identifiable information from our website, you should contact us.

This may limit the service we can provide to you.

24. Verification of your identity

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

25. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 25.1. to provide you with the services you have requested;
- 25.2. to comply with other law, including for the period demanded by our tax authorities;
- 25.3. to support a claim or defence in court.

Other matters

26. If you are not happy with our privacy policy

- 26.1. If you are not happy with our privacy policy or if you have any complaint then you should tell us.
- 26.2. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- 26.3. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

27. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

28. Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please [contact us](#).