

William Nelhams & Co Customer Privacy Notice

Please find below our privacy policy in compliance with data protection regulations.

Blue Poppy Estates Limited trading as William Nelhams & Co is an independent company established in Childs Hill in 1975 handling residential sales, lettings and management in North West London. Company registration number: 10139956

We are Members of Propertymark & are part of their Client Money Protection Scheme, Moneyshield and Members of The Property Ombudsman Scheme Membership Number T00577.

The type of personal information we collect

We currently collect and process the following information:

- Identity Information: including your full name.
- Contact Information: such as your address, phone number, and email address (personal or work-related).
- Identity Verification Details: information required by law to comply with the Money Laundering Regulations 2017.
- Banking Information: such as account details when needed for service requests or use of our services.
- Financial, Economic, and Tax Data: including tax identification, tax status, country of residence, income, other earnings, and asset valuation.
- Personal and Household Information: including marital status, property ownership, household composition, and owned properties.
- Communication Records: including emails and other correspondence with us during product or service inquiries.

If we are legally required to collect personal data (such as to fulfill our obligations for fraud prevention and money laundering) or need it under the terms of a contract with you, and you do not provide the requested data, we may be unable to fulfill or proceed with the contract (for example, providing our services). In such cases, we might need to cancel a product or service you have with us, but we will inform you if this happens.

Special Categories of Personal Data

This information may be processed to fulfill our legal and health and safety responsibilities, including any access needs you may have. While this data is not collected regularly, you might provide it to help us identify suitable properties for you. The information you choose to share may include special category personal data, such as details about any disabilities or other health-related information.

How we get the personal information and why we have it

We collect and process your data for various reasons, depending on the specific circumstances, but we will only do so when we have a legal basis for it. Below, we outline the purposes and legal grounds for using each type of data.

Your personal data may come directly from you or from other sources, such as parties involved in the services we provide e.g., financial advisors or legal representatives, agents we act on behalf of, professional organizations, financial institutions, suppliers, or contractors. We may also obtain data from public sources like the Land Registry.

This list is not comprehensive, and given the nature of the property industry, new types of personal information may be shared with us as new needs arise. Therefore, we regularly review and update this policy. We then process it for one of the following reasons:

- To maintain and manage our relationship with you
- To deliver services you require
- To address your inquiries
- To fulfill our legal responsibilities as a business

- To inform you about properties and services that may be of interest
- To provide guidance regarding the services you purchase from us

More detailed examples may include:

- To meet our obligations to you while providing our property services
- To share your information with others as needed to fulfill our property services or when acting as an agent for a third party
- To request and collect premiums for Buildings Insurance when arranged by us or by landlords directly or through brokers
- To comply with statutory and regulatory requirements, including verifying your identity, preventing fraud and money laundering, managing immigration, and assessing your creditworthiness
- To request and collect service charges on behalf of managed clients
- To provide you (or allow third parties to provide you) with information about goods or services we believe may interest you, provided you have given us permission
- To collect tenancy deposits
- If you are an existing customer, to contact you by electronic means (including email or SMS) with information about our own goods and services similar to those you have already received from us or negotiated to obtain from us. You can opt out of these marketing messages at any time.
- For statistical purposes to analyze data that helps us manage our business and plan for the future
- To inform you of any changes to our services or business

We rely on the below lawful bases for processing this information under the UK General Data Protection Regulation (UK GDPR):

- **Your consent:** If you have provided consent, you can withdraw it at any time by contacting us.
- **Contractual obligation:** We have a contractual duty to process your data when it is necessary for fulfilling a contract you are part of or to take steps before entering into a contract with you to provide our products and services.
- **Legal obligation:** We may process your data to comply with legal requirements, such as those under Money Laundering legislation, or to provide information to law enforcement agencies or courts.
- **Legitimate interest:** We may process your data when it is necessary for our legitimate interests, provided that these interests do not conflict with the rights, interests, or freedoms of individuals (including you).

To assess this, we will consider several factors, such as the information provided to you when you submitted your data, your expectations regarding the processing of your personal data, the nature of the data itself, and the potential impact of the processing on you. Our legitimate interests may include activities aimed at improving and promoting our services and products, understanding our customers' interests and knowledge of the property market, and managing the technical aspects of our services and products.

Or on rarer occasions:

- **Where we need to protect your interests** (or someone else's interests); and/or
- **Where it is needed in the public interest** or for official purposes

Data sharing

We only disclose your personal information when there is a legal, regulatory, or professional requirement to do so, in order to enforce the applicable rules and protect the rights or safety of all parties involved. Occasionally, we may share your data with third parties. This may include:

- Landlords and vendors, along with their professional advisors such as solicitors, accountants, and surveyors.
- Engaging third-party service providers to carry out various business functions on our behalf. This includes service providers for specific tasks, such as IT support, legal counsel for legal advice and guidance, or contractors performing maintenance or repairs on properties where you may reside.
- When we arrange Buildings Insurance for the properties we manage.

- In instances where we collect tenancy deposits registered with The Dispute Service Limited.
- Regulatory bodies, law enforcement agencies, and courts.
- In the event of a sale of all or part of our business, to the buyer and their professional advisors.
- If we are obligated to disclose or share your personal data to meet any legal or regulatory requirements, or to protect the rights, property, or safety of our company, our customers, or others. This includes sharing information with other companies and organizations for fraud protection and reducing credit risk.

Third party (Sub-Processor) organizations

For our everyday data processing tasks, we rely on third-party organizations and systems to assist us in managing and overseeing the services we offer:

- For IT and software services (such as Microsoft, which provides our office software) to help manage our customers, staff, and office administration.
- For financial transactions and accounting (e.g., payments to our company and those made on behalf of clients are processed through our Barclays accounts).
- To distribute newsletters, promotional information, industry updates, or other content that may interest you.
- To enhance our services.
- For managing our website and customer interactions.
- For obtaining legal advice related to the services we provide.

Access to your personal information is granted only when legally required or necessary for us to fulfill our service obligations. We do not and will never sell your personal information to third parties.

International transfers

At times, your personal data may be transferred outside the UK. For instance, this could occur when our services involve parties in other countries (such as agents, buyers, or sellers) or when we collaborate with partners and service providers located outside the UK (e.g., Microsoft for our IT services). In such cases, your personal data may be accessed or processed in those other countries.

We have established measures and safeguards to ensure that any data transfer complies with our data protection laws. For example, when the UK Government has determined that the country receiving your data provides an adequate level of protection. If the transfer is to a country not deemed adequate by the UK Government, we ensure that Standard Contractual Clauses or International Data Transfer Agreements, approved by the Information Commissioner's Office (ICO), the UK Government, or the European Commission, are in place. This is done after a thorough assessment to confirm that the companies receiving your data can adhere to these clauses. Please contact us if you would like more information.

Keeping your information safe and secure.

We are dedicated to safeguarding personal information to prevent inappropriate or accidental access, use, sharing, destruction, or loss. We strive to ensure that our suppliers implement similar security measures to protect your data. Additionally, we take organizational steps to maintain information security and provide ongoing training for our staff on data protection practices.

How long we keep your data

We will retain your data only for as long as needed to fulfill the original purposes for which it was collected. Once those purposes have been met, your data will be permanently deleted unless a new reason for processing it arises.

Typically, we will keep your personal data for five (5) years after our last interaction with you or the conclusion of our contract. In some cases, depending on the service you have selected, a longer retention period may be necessary.

Your data protection rights

Under data protection law, you have rights including:

- Your right of access: You have the right to request copies of your personal information from us.
- Your right to rectification: You have the right to ask us to correct any personal information you believe is inaccurate, as well as to request the completion of any information you think is incomplete.
- Your right to erasure: You have the right to request the deletion of your personal information in certain situations.
- Your right to restriction of processing: You have the right to request a restriction on the processing of your personal information under certain conditions.
- Your right to object to processing: You have the right to object to the processing of your personal information in specific circumstances.
- Your right to data portability: You have the right to request that we transfer your personal information to another organization or to you in certain situations.
- Your rights regarding automated decision-making and profiling: Generally, you have the right not to be subjected to a decision made solely through automated processing, including profiling. However, we may carry out such automated decisions if it is necessary for the performance of a contract with you, authorized by law or regulation, or if you have provided explicit consent.

You are not usually required to pay any charge for exercising your rights. If you make a request, we have a calendar month to respond to you.

Please contact us if you wish to make a request.

Cookies

William Nelhams & Co's website (williamnelhams.com) does not use any cookies that store information of its users and only uses session cookies.

Session cookies fall under the categorization of strictly necessary cookies under the [General Data Protection Regulation \(GDPR\)](#), applicable in the European Union and the UK. Strictly necessary cookies like session cookies are exempt from the consent requirements underlined in the GDPR.

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Document Last Updated: 16/10/2024