



## Privacy Policy

Effective date: 25th May 2018

Michael Jones & Co. Limited ("us", "we", or "our") operates the [www.michaeljones.co.uk](http://www.michaeljones.co.uk) website (the "Service").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

All your Personal Data shall be held and used in accordance with the EU General Data Protection Regulation 2016/679 ("GDPR") and national laws implementing GDPR and any legislation that replaces it in whole or in part and any other legislation relating to the protection of personal data. If you want to know what Personal Data we collect and hold about you, or to exercise any of your rights as set out below, please email us at [marketing@michaeljones.co.uk](mailto:marketing@michaeljones.co.uk).

Michael Jones & Company (Estate and Letting Agents) is the controller of your Personal Data for the purposes of the GDPR and is a company registered under number 03627931 and whose VAT number is GB 665 1530 40.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Terms used in this Privacy Policy have the same meanings as our Terms and Conditions, which are provided when undertaking our Service.

\*Michael Jones & Company, Michael Jones & Bacon and Michael Jones & Curtis all trade under Michael Jones & Co. Limited and are therefore covered under the same privacy policy.

### Definitions

#### Personal Data

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

#### Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

#### Cookies

Cookies are small pieces of data stored on a User's device.

#### Data Controller

Data Controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your data.

### **Data Processor (or Service Providers)**

Data Processor (or Service Provider) means any person (other than an employee of the Data Controller) who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

### **Data Subject**

Data Subject is any living individual who is the subject of Personal Data.

### **User**

The User is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

### **Information Collection and Use**

We collect several different types of information for various purposes to provide and improve our Service to you.

### **Types of Data Collected**

#### ***Personal Data***

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

Residential Sales		
Information collected	Reason we collect it	How we process it
Client name, home address, telephone numbers, email address	To engage in business with the client	Secure property management software and secure office filing system
Photographic identification and proof of residency (can include bank statements)	Compliance with UK Money Laundering Regulations 2017	Secure office filing system
Property keys and alarm details	To engage in day to day business (estate agency)	Secure code system
Transfer of Data		
Data may be shared with necessary third parties such as solicitors, financial advisors, surveyors, professional photographers and relevant departments within Michael Jones & Co. Limited, when dealing with legal matters of mutual clients and / or for the purpose of aiding a property purchase.		
Retention of Data		
All collected data will be held indefinitely in accordance with our processes. This applies to anyone who has sold, bought or had a property valued by Michael Jones & Co. Limited. You have the right to object to our retention policy, if so please contact us by contacting the email above.		
Automated Decision Making		
7 years		
Securing your Information		
We store all electronically on our software system which is securely password protected. This is in adherence with NAEA regulations.		

Lettings (including Michael Jones & Bacon)		
Information collected	Reason we collect it	How we process it
Client name, home address, telephone numbers, email address	To engage in business with the client, to meet the terms and conditions and tenancy agreements	Secure property management software and secure office filing system
Photographic identification	For verification of clients' identity and undertake assessments for Right to Rent	Secure property management software and secure office filing system
Bank details	To pay clients' money in accordance with agreed contracts	Secure property management software
Credit search history	For qualifying potential tenants for properties	Secure property management software and secure office filing system
Employment and income information	For qualifying potential tenants for properties	Secure property management software and secure office filing system
Property keys and alarm details	To engage in day to day business (estate agency)	Secure code system
Transfer of Data		
Data may be shared with landlords and necessary third parties such as contractors, utility management companies, tenancy deposit protection companies, credit and referencing agencies, inventory providers, banking organisation's, Home Office, HMRC and relevant departments within Michael Jones & Co. Limited, solicitors, financial advisors and letting agents when dealing with legal matters of mutual clients and / or for the purpose of aiding a property to be let.		
Retention of Data		
All collected data will be held for a period of 7 years from first client engagement and / or 7 years following the termination of a contract. You have the right to object to our retention policy, if so please contact us by contacting the email above.		
Automated Decision Making		
7 years		
Securing your Information		
We store all electronically on our software system which is securely password protected. Audited in accordance with ARLA regulations.		

New Homes		
Information collected	Reason we collect it	How we process it
Client name, home address, telephone numbers, email address	To engage in business with the client	Sending emails (via MailChimp) about suitable property developments (current and future)
Photographic identification (passport, driving license), utility bills, bank statements from purchasers	Compliance with UK Money Laundering Regulations 2017	Using our secure office filing system
Reservation forms, CML forms and sales Incentive forms for purchase	To conduct business with the purchaser and developer	Using our secure office filing system

Name, address, telephone number and email address	To ensure we are financially qualified by our Independent Financial Adviser	Via email and phone to Financial Adviser
<b>Transfer of Data</b>		
Data may be shared with necessary third parties such as solicitors, financial advisors, surveyors, professional photographers, contractors, relevant departments within Michael Jones & Co. Limited and estate agents when dealing with legal matters of mutual clients and / or for the purpose of aiding a property purchase.		
<b>Retention of Data</b>		
Archived files are kept for 7 years. You have the right to object to our retention policy, if so please contact us by contacting the email above.		
<b>Automated Decision Making</b>		
7 years		

Commercial		
Information collected	Reason we collect it	How we process it
Client name, home address, telephone numbers, email address. Agreements such as terms and conditions, and proof of funds required.	To engage in business with the client	
Photographic identification (passport, driving license)	Compliance with UK Money Laundering Regulations 2017	
<b>Transfer of Data</b>		
Data may be shared with solicitors, financial advisors, surveyors, professional photographers, architects and other departments within Michael Jones & Co. Limited.		
<b>Retention of Data</b>		
Data (client files) are retained indefinitely. Files are archived internally on our secure system and destroyed / delated when applicable. You have the right to object to our retention policy, if so please contact us by contacting the email above.		
<b>Automated Decision Making</b>		
7 years		

You may provide us with information in a number of ways:

- by supplying us with the Information as listed above, on an individual basis by registering as to use our Service or subscribing to receive updates or offers from us.
- by corresponding with us by email, in which case we may retain the content of your email messages together with your email address and our responses
- through any preferences and areas of interest as advised by you on subscribing to our online services;

- by Information provided when you use our mobile optimised website from your portable hand-held device including details of your physical location, where you have agreed to it being used.

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us at any time, by following the unsubscribe link at the bottom of the emails or by contacting us directly.

### ***Usage Data***

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

### ***Tracking Cookies Data***

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

### **Use of Data**

Michael Jones & Co. Limited uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

## **Retention of Data**

Michael Jones & Co. Limited will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Michael Jones & Co. Limited will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

In certain circumstances, once we have deleted or anonymised your data, we may need to retain parts of it (for example, your email address), in order to comply with our obligations under GDPR or other legislation, or for fraud detection purposes.

## **Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your country where the data protection laws may differ than those within your area.

If you are located outside the United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Michael Jones & Co. Limited will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

## **Disclosure of Data**

### **Disclosure for Law Enforcement**

Under certain circumstances, Michael Jones & Co. Limited may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Legal Requirements**

Michael Jones & Co. Limited may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Michael Jones & Co. Limited
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## **The legal basis for processing your Information**

- Under GDPR, the main grounds that we rely upon in order to process your Personal Data are the following:
- Necessary for compliance with a legal obligation – we are subject to certain legal requirements which may require us to process your Personal Data. We may also be obliged by law to disclose your Information to a regulatory body or law enforcement agency;
- Necessary for the purposes of legitimate interests - either we, or a third party, will need to process your Personal Data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your Information protected. Our legitimate interests include responding to requests and enquiries from you or a third party, notifying of changes to our Service, optimising our website and user experience, informing you about related and relevant properties and ensuring that our operations are conducted in an appropriate and efficient manner;
- Consent – in some circumstances, we may ask for your consent to process your Personal Data in a particular way.

## **Security Of Data**

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## **Your Rights**

Michael Jones & Co. Limited aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

Whenever made possible, you can update your Personal Data directly within your account settings section. If you are unable to change your Personal Data, please contact us to make the required changes.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the right:

- To access and receive a copy of the Personal Data we hold about you
- To rectify any Personal Data held about you that is inaccurate
- To request the deletion of Personal Data held about you

You have the right to data portability for the information you provide to Michael Jones & Co. Limited. You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it.

To the extent that we are processing your Personal Data based on your consent, you have the right to withdraw your consent at any time. You can do this by unsubscribing via the link provided in any direct marketing communication or contacting us at the email address set out above.

You can exercise any of the above rights by contacting us at the email address set out above. You can exercise your rights free of charge.

Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

Please note that we may ask you to verify your identity before responding to such requests.

## **Service Providers**

We may employ third party companies and individuals to facilitate our Service ("Service Providers" or "Data Processors"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **Analytics**

We may use third-party Service Providers to monitor and analyse the use of our Service.

**Google Analytics** is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the [Google Privacy Terms web page](#).

## **Behavioral Remarketing**

Michael Jones & Co. Limited uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our Service.

**Google AdWords** remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the [Google Ads Settings page](#).

Google also recommends installing the [Google Analytics Opt-out Browser Add-on](#) for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the [Google Privacy Terms web page](#).

**Facebook** remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting [this page](#).

To opt-out from Facebook's interest-based ads follow [these instructions](#) from Facebook.



Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the [Digital Advertising Alliance](#) in the USA, the [Digital Advertising Alliance of Canada](#) in Canada or the [European Interactive Digital Advertising Alliance](#) in Europe, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit [Facebook's Data Policy](#).

### **Trusted Third Parties**

In order to provide certain services, we will share your Personal Data with third party service providers such as IT infrastructure companies and email logistics / marketing automation providers. We will not share your Personal Data with any third party where it is not necessary to do so to provide a service to you.

- CRM systems and IT infrastructure companies include: [Reapit](#) and [Qube SLM](#)
- Collecting customer feedback: [Trustpilot](#) and [Yomdel](#)
- Email logistics / automation provider: [MailChimp](#) and [Fragra](#)
- Marketing Agency: [Tiger Marketing](#)

### **New Business Owners**

If we or our business merges with or is acquired by another business or company, we will share your Personal Data with the new owners of the business or company and their advisors. If this happens, you will be sent notice of such an event.

### **Links To Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **Children's Privacy**

Our Service does not address anyone under the age of 13 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

### **Changes To This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us by visiting our [contact page](#) on our website.

## **Making a Complaint**

If you are unhappy about our use of your Information, you can contact us at the link above. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods:

**Telephone:** 0303 123 1113

**Website:** <https://ico.org.uk/concerns/>

**Post:** Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF