

WELCOME TO BIDWELLS LLP'S PRIVACY NOTICE

Introduction

Bidwells respects your privacy and is committed to protecting your personal information. This privacy notice will let you know how we look after your personal information generally as well as when you visit our website and tell you about your privacy rights and how the law protects you.

This privacy notice aims to give you information on how Bidwells LLP collects and processes your personal data. It is intended to cover all of your rights and information required under data laws including the General Data Protection Regulations (GDPR) and the UK Data Protection Act 2018. We may need to update the information from time to time.

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.

Who are we?

Bidwells LLP is the Data Controller and responsible for your personal data (collectively referred to as "Bidwells" "we", "us" or "our" in this privacy notice).

Bidwells has the associated companies listed below. If we need to share your personal information with any of these companies then for the purposes of this privacy notice, Bidwells will also refer to the relevant associated company.

Associated companies:

- Bidwells Holdings Ltd
- Copewell Ltd
- Creative Places LLP

What data do we collect about you?

We collect and process a range of personal information.

We will collect your full name and contact details (such as phone number, email address and postal address and company details if applicable) from you whenever you deal with us.

We may record telephone conversations which will log a recording of the call and your telephone number.

Your professional or personal online presence, e.g. LinkedIn profile, if you share it with us

Your contact history, transaction and instruction history with us.

When we provide our services to you, or on your behalf, where we are required to do so by law, we will collect information relating to your identity, which will be at least one form of photographic identification (such as a passport, a driving licence or an identification card confirming your date of birth) and one form of documentation with proof of your place of residence (such as a recent utility bill).

Your nationality and immigration status and information from related documents, and immigration information, e.g. if you are a potential tenant applying for a tenancy

Information to enable us to undertake Anti Money Laundering and Terrorist Financing electronic checks on you

Information about how you use our website, IT, communication and other systems

Your responses to surveys, competitions and promotions

The types of personal information we collect about you usually falls into the following categories:

- Identity and contact information from our direct interaction with clients and contacts in order to provide our professional services
- Financial information which may include bank account details
- Contact information from our clients and contacts in order to engage in direct marketing, keep you up to date on the services we offer and other issues that may be of interest to you
- From each visitor to our web site, we may automatically collect personally identifiable technical information about your visits, which includes information about your internet service provider, browser type, operating system, pages accessed on our sites and online sources, and the date and time of access in order to optimise your user experience and enhance your time spent with us online. We also receive information telling us which site you came to our site from. Of course, we may also collect details you post to our website or those of other sites and social media platforms. Our website and online services use [cookies](#) to distinguish you from other users. This helps us to provide you with a better experience and also allows us to improve our site and services. We also may collect non-personally identifiable information when you access and use our website. We are not responsible for the data collection, privacy practices or policies of any third-party websites that we may link to or that may link to our websites. We encourage you to read the privacy policy of every website you visit.

For the above purposes, a client includes any organisation or individual who is identified as a client on Bidwells systems (regardless of whether we charge any fees) and a contact includes any individual who is a contact of the firm whether a representative of a client or a former or prospective client, any supplier, consultant, another professional adviser, intermediary or agent.

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 services). In this case, we may have to cancel a service you have requested from us but we will notify you if this is the case at the time.

We may need to collect information from third party sources (for example, to verify your identity). The third party is responsible for your information and its disclosure to us and you should always check that privacy notices and statements from any entity that makes available information about you.

In relation to the technical information we collect, 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 our websites may become inaccessible or not function properly.

How and why do we use your personal information?

The law requires us to ensure we have a lawful basis for processing your personal information. This is usually because it is necessary for:

- the performance of a contract that you enter in to with us; and/or
- our legitimate interests or those of a third party; and/or
- compliance with a legal obligation.
- to assist in quality monitoring of staff
- to investigate and resolve a complaint

Sometimes we seek your consent for our use of your personal information.

We may ask you to consent to our collection and use of certain of your personal information. Where this is the case, you can change your mind and withdraw your consent at any time by e-mailing us at gdprinfo@bidwells.co.uk or visiting the marketing preferences section of this web site [here](#).

In relation to direct marketing, you can also always opt out of receiving our marketing messages – see below.

We use your personal information under the legitimate interest basis for using and processing. Legitimate Interest may be used as a basis for processing when we have a business or commercial reason to process your information, so long as this is not overridden by your own rights and interests.

Recording of calls is necessary to protect the interests of you, our staff or both.

You may request that your call isn't recorded. In this situation, you'll normally be advised to contact us either **in writing** or by **email**.

When we use and process your personal information for our legitimate interest, we will consider and balance any potential impact on you and your rights under data protection and any other relevant laws. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your valid consent or are otherwise required or permitted to by law).

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use personal information for	Our reasons
To provide services to you and managing activities related to your services	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Bidwells	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity. Screening for financial and other sanctions or embargoes. Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulators and supervisory bodies	To comply with our legal and regulatory obligations

Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Tailoring, developing, improving our services	Ensuring content from our web site is presented to you in the most effective manner for you and for your computer.
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information. To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, range of services or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you. To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract. To comply with our legal and regulatory obligations. For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations. For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services to: <ul style="list-style-type: none"> — existing and former customers; — third parties who have previously registered with us or expressed an interest in our services; — third parties with whom we have had no previous dealings including: <ul style="list-style-type: none"> — marketing and promotional messages — surveys — providing information relating to matters that may be of interest to clients and contacts — notifications of events and new services — newsletters 	<p>Consent to be obtained for all new marketing contacts.</p> <p>For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers and contacts.</p> <p>For our legitimate interests, when such information is in the public domain</p>

Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks, e.g. for ISO Standards or Investors in People accreditation and the audit of our accounts	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards. To comply with our legal and regulatory obligations

We do not collect, use or process special category personal information, such as racial or ethnic origin, political opinions, religious beliefs, trade union membership, genetic and biometric data, data concerning health, sex life or sexual orientation.

Who do we share your personal information with?

Your data may be accessed by and shared with all members of the Bidwells group of companies who are all committed to complying with the terms of this privacy notice.

We may need to share your details with others in order to perform our services to you. For example, we may need to deal with professional advisers, agents, brokers, lenders, credit reference agencies, tenants' vetting companies, electronic search providers, maintenance contractors and other parties on your behalf and in connection with our services, depending on the nature of the services you would like us to deliver.

A number of third party service providers are engaged by Bidwells to assist in the operation of our business and the running and maintenance of our systems e.g. website suppliers, case management system providers etc. All third party service providers are subject to a Data Protection Impact Assessment (DPIA) in order that we may independently assess their information security processes. When we use third party service providers, we disclose only the personal information that is necessary to deliver the service. We ensure we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

We may share aggregated data with service providers who provide us with reports on industry trends and other information to assist us in supplying our services to our clients.

We may release your information to third parties beyond the above only if we are required to do so by law (e.g. by a court order), in connection with the prevention of fraud or other crime or to comply with our legal and regulatory obligations.

How your personal information is collected

We collect most of this personal information directly from you — in person, by telephone, text or email and/or via our website. However, we may on rare occasions also collect information from publicly accessible sources, e.g. Companies House or HM Land Registry.

We may also collect information from other publicly accessible sources such as:

- directly from a third party, e.g.:
 - sanctions screening providers;
 - credit reference agencies;
 - customer due diligence providers;
 - from cookies on our website — for more information on our use of cookies, please see our cookies policy

How can you opt out of direct marketing?

You can ask us to stop sending you marketing messages at any time by:

- following the opt-out links on any marketing message sent to you
- contacting us at any time at the details or below or via gdprinfo@bidwells.co.uk
- amending your preferences via our Preference Centre [here](#)
- telephoning us as described above.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of the provision of our services or other transactions with us.

How do we protect the personal information you provide to us?

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.

We have 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.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Where your personal information is held

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: 'Who do we share your personal information with').

How long will you keep my information?

We will not to keep your personally identifiable information in a form that allows you to be identified for any longer than is reasonably necessary for achieving the permitted purposes. This means that data will be destroyed or erased from our systems or anonymised when it has reached the applicable retention period.

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 certain basic information about our clients for at least fifteen years after they cease being clients.

Will you transfer my information overseas?

Personally identifiable information may be transferred outside of the UK and/or the European Economic Area (“EEA”) to other third parties as set in the section above, and we will ensure that adequate protection is provided for that data as required under data protection laws.

What happens to your personal information on a change of control of our business?

In the event of a business change in control resulting from, for example, a sale to, or merger with, another entity, we may transfer your personally identifiable information to the new party in control. The recipient of the information will be bound by confidentiality obligations.

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information — in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information — in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party — in certain situations
To object	The right to object: — at any time to your personal information being processed for direct marketing; — in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights under the GDPR.

If you would like to exercise any of those rights, please:

Email, call or write to us — see above: ‘How can you opt out of direct marketing?; and

- let us have enough information to identify you;
- we may need to have proof of your identity and address; and
- let us know what right you want to exercise and the information to which your request relates

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The GDPR also gives you the right to lodge a complaint with a supervisory authority, where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

We may change this privacy policy from time to time —when we do we will inform you via email and/or via our website at www.bidwells.co.uk

How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Bidwells House, Trumpington Road, Cambridge, Cambridgeshire. CB2 9LD

gdprinfo@bidwells.co.uk

01223 841841