



## Privacy Policy

### SCHEDULE 1

Data about our clients, and all individuals in respect of whom we have acquired personal information in connection with any products or services offered by us (including directors, shareholders, consultants, employees or other personnel of our clients)

WHAT WE COLLECT	WHERE WE COLLECT THE INFORMATION FROM?	HOW WE MAY USE YOUR INFORMATION	WHO WE SHARE YOUR INFORMATION WITH
Contact details such as your name, home/ work addresses, email address, landline/ mobile phone or fax numbers.	Real Estate Brokerages Real Estate Agencies Individual / Corporation Referrals	If it is necessary for the performance of our contract or for the purposes of entering into a contract: for the purpose of negotiating and entering into contractual agreements with you, in the course of receiving services from you e.g. contacting individuals where we need to do so to provide instructions and discuss work involved.	How we share information within the Group  1.We may share information about you with any company within the Group for the purposes set out in this Privacy Policy (e.g. customer relationship management, software and service compatibility and improvements and to provide you with any information, applications, products or services that you have requested).
Employment Information such as your position / title, employment history, professional specialisms and qualifications.	Real Estate Brokerages Real Estate Agencies Individual / Corporation Referrals	If it is in our legitimate business interests to do so: for internal record keeping for administration purposes, for the purpose of communications in relation to establishing a supplier relationship, obtaining evidence of identity of our suppliers, communications regarding our service and fees, for insight purposes (e.g. to analyse market trends and demographics, and develop the service which we offer to you or other individuals in the future) and sending information to you about products and services which we think may be of interest to you for marketing purposes.  Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements	How we share information outside the Group  2. Please note that personal information we are holding about you may be shared with and processed by:  2.1 regulators or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;  2.2 credit reference and fraud prevention agencies;  2.3 any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);  2.4 other parties and/or their professional advisers involved in a matter where required as part of the conduct of the services;  2.5 our own professional advisers and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
Payment information such as bank details and transaction history.	Individual / Corporation	If it is necessary for the performance of our contract: for the purpose of making or receiving payments in the course of the supplier's services.  If it is in our legitimate business interests to do so: for internal record keeping for administration purposes, for the purpose of retaining evidence of payment transactions, for insight purposes (e.g. to analyse market trends and demographics in relation to our fees), for establishing our client's ability to pay costs and to develop the service which we offer to you or other individuals in the future).	

WHAT WE COLLECT	WHERE WE COLLECT THE INFORMATION FROM	HOW WE MAY USE YOUR INFORMATION	WHO WE SHARE YOUR INFORMATION WITH
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**Identification information** contained in or provided to us as part of our client ID checks. This includes details included in copy personal photo and residential ID documents we receive.

Individual / Corporation

**Compliance with a legal obligation:** in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements.

**If it is our legitimate business interests to do so:** for the purposes of obtaining evidence of identity of our client and internal record keeping for administration purposes.

**Compliance with a legal obligation:** in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements.

**Consent:** if disclosing to other organisations where we cannot rely on any legal obligation to do so.

- 2.6 our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, our bank, payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services and information you have requested;
- 2.7 third parties as part of the arrangements for any event for which you have expressed an interest in attending;
- 2.8 third parties for marketing purposes (with your consent), e.g. our partners and other third parties with whom we work and whose products or services we think will interest you; and
- 2.9 another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguards are in place).

Updated: 6 March 2024