



# PRIVACY & DATA POLICY

This privacy policy notice tells you what to expect us to do with your personal information.

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## 01. Contact Details

Post: The Stow Brothers, 236 Hoe Street,  
London, E17 3AY, GB  
Telephone: 0203 397 9797  
Email: [hello@stowbrothers.com](mailto:hello@stowbrothers.com)

## 02. What Personal Information We Collect, Use and Why

Our commitment to safeguarding your privacy is fundamental to our business practices at The Stow Brothers. This Privacy Notice outlines how we collect, use, and protect your personal information. As the data controller, we adhere to applicable data protection legislation, ensuring the confidentiality of your information and sharing it only in accordance with this Privacy Notice.

This policy covers all entities within The Stow Brothers, including but not limited to Stirling and Co.

Personal information includes any data that reveals details about you, such as your name, addresses, contact information, date of birth, National Insurance number, purchase and account history, credit reference information, website user information, photographs and video recordings, call recordings, records of meetings and decisions, biometric information (where used to identify someone) and other relevant details about your circumstances. Special categories of personal data, such as health information or religious beliefs, will be handled with additional justifications and in compliance with relevant regulations.

The types of information collected depend on the services we provide which are integral to providing a service including buying, selling, letting, or managing rental properties.

We process your personal information for various purposes, including fulfilling our contractual obligations, complying with legal requirements, and pursuing legitimate interests. This may involve sharing your information with third parties such as solicitors, developers, other estate agents in chains and referencing agencies, Finance companies such as Many Hands mortgages, Linear Financials Solutions, and AKA

Maintenance (t/a Neighbourhood Property Services) and contractors always with due consideration to your rights and privacy.

### **Lawful Basis for Processing Your Personal Information**

In accordance with data protection legislation, the utilisation of your personal information is permissible only when there is a legal basis to do so. We rely on the following legal bases for processing your information:

**Contractual Obligations:** Where we need information to fulfil the contractual agreement entered into with you.

**Legal Obligations:** When processing is necessary to comply with a legal obligation.

**Legitimate Interests:** Processing is deemed necessary for us, or a third party, to carry out activities within Stow Brothers legitimate interests. This is provided that your interests and fundamental rights do not override those interests. This includes:

**Promotion of Business:** Processing required to promote our business, brands, and products, and measure the reach and effectiveness of our campaigns. This involves sending marketing information, which you have the right to opt out of at any time.

**Real Estate Sector Knowledge Improvement:** Processing needed to enhance our understanding of the real estate sector through market analysis and research, aiming to provide more tailored and relevant services for our customers in the future.

### **Operational Efficiency:**

Processing necessary for the efficient and effective operation of administrative and technical aspects of our business. This includes verifying the accuracy of information, outsourcing administrative functions to specialised third parties, and ensuring network and information security.

In more limited circumstances, we may also rely on the following legal bases:

**Protection of Interests:** When processing is necessary to protect your interests or someone else's.

**Public Interest or Official Purposes:** When processing is needed in the public interest or for official purposes.

We may process special categories of personal information and criminal conviction information under the following limited circumstances:

**Employment-related Purposes:** When processing is required for employment-related matters.

**Explicit Consent:** With your explicit consent, wherein the purpose of information usage will be explained at the point of seeking your consent.

For specific details on how your personal information will be used in relation to the services you have requested, please refer to the information provided below.

**Finance:** Your personal data may be shared with Many Hands Mortgages or Linear Financials Solutions, independent companies as "preferred supplier" relationships with The Stow Brothers. This sharing is done on a referral basis to help arrange financing for property acquisition and provide the following services:

If you're using mortgage brokerage services, we'll share necessary personal information with lenders (and for high-value mortgage customers, private banks) to fulfil our obligations in finding funding options for you.

If you're an insurance customer, we'll share information with a chosen panel of insurance providers to obtain suitable options for your insurance needs.

**Anti-Money Laundering Regulations:** AML checks are required by law. Estate agents must conduct thorough checks for money laundering on individuals involved in property transactions, whether selling or buying. While we maintain the responsibility for ensuring the accuracy of these checks and ongoing monitoring, the initial verification process is outsourced to Smart Search on our behalf. We may also need to collect information on other individuals who have an interest in the property who are not considered

to be our customers such as where gifted funds are coming from.

Upon instructing us for your sale or upon acceptance of an offer for a property you intend to purchase, you will receive communication — via text, email, or both—to initiate this process.

**Other uses of your personal information:**

- If we sell any part of our business and/or integrate it with another organisation your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their advisers. If this occurs the new owners of the business will only be permitted to use your information in the same or similar way as set out in this privacy notice.

- We will share personal information with our regulators, governmental or quasi-governmental organisations, law enforcement authorities and with courts, tribunals and arbitrators as may be required from time to time in order to comply with our regulatory and legal obligations.

- Where we use third party services providers who process personal information on our behalf in order to provide services to us. This includes IT systems providers and IT contractors as well as third party referencing or screening agencies for the purposes of the prevention and detection of crime and for AML, right to rent checks, photographers, surveyors and compliance.

- We will hold your personal information on our client management systems and use this to provide you with marketing information via Brief Your Market software about similar services offered by The Stow Brothers to those which you have engaged us to provide which we feel you might find useful from time to time. You have the opportunity to opt out of receiving this information at any time.



## 03. Lawful Bases & Data Protection Rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

**Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.

**Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.

**Your right to erasure** - You have the right to ask us to delete your personal information. You can read more about this right here.

**Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. You can read more about this right here.

**Your right to object to processing** - You have the right to object to the processing of your personal data. You can read more about this right here.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.

**Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## 04. How We Keep Your Information Secure

Ensuring the security of your information is paramount to us. We employ measures like secure client management systems, restricted access, and secure data hosting to prevent unauthorized access or damage to your personal data.

## 05. For How Long Do We Keep Your Personal Information

The retention period for your personal information depends on the type of service you’ve requested. We may retain data longer for statutory or regulatory reasons or to address potential legal claims for up to 7 years.

## 06. Overseas Transfers of Your Personal Information

In some cases, we may transfer, store, or process your information outside the UK and the European Economic Area (EEA). Appropriate safeguards, such as standard contractual clauses, will be implemented to ensure your data’s protection.

## 07. The Use of Cookies by The Stow Brothers

When using our website, we employ strictly necessary cookies for optimal performance. Non-essential cookies are only utilized with your consent, which can be provided through the cookies banner.

## 08. Complaints

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:  
Information Commissioner's Office, Wycliffe House  
Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113  
Website: <https://www.ico.org.uk/make-a-complaint>

