

Data Retention Policy

We wish to keep consumers advised of our services and therefore retain data for marketing purposes. From time to time consumers request that we stop providing them with information about our services.

In the event that this request is made then the data is anonymised & frozen within our system and put 'beyond use'; this means that apart from the Data Protection Officers, the data will no longer appear to exist to all other members of staff, or be visible on any of our computer systems save for, the automated system checks carried out, which are compulsory in order for us to ensure they are not contacted again if they have asked not to be contacted or marketed to.

We have been advised by the ICO to have a granular Data Retention Matrix (please find on next page).

From time to time consumers ask that their data be deleted.

Once a consumer's data falls outside of our Legal Retention periods', a consumer may insist that their data is deleted. As far as is reasonably possible we will delete the data and advise the consumer that as we acquire data from various legitimate sources, their contact details may be purchased and added back into our database which may therefore mean that they could be contacted in a future marketing campaign. At that point, they would be required to submit a request to invoke the companies Right to Erasure Procedure contained herein. As part of this procedure a consumer can either choose the right to be forgotten whereby their data is anonymised and frozen or insist their data be deleted again.

In the unfortunate event that we have a legal requirement to produce data by the courts, the police or other public authority, that request should be made in writing to The Data Protection Officers, details of which can be found below and/or on our website.

The Data Protection Officers will facilitate the unfreezing of the data within the system to comply with the public authorities to produce said data.

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1) Data Retention Matrix – Clients and Potential Clients

You give your consent for us to hold your information and contact you when you are registered by our staff as looking to buy, rent or reside in a property, you will also receive a copy of our privacy policy

We will retain your data for the following periods of time:

| Description | We will send you marketing emails and newsletters until you | We may communicate with you by phone, email or letter until you | We will retain information on you in our systems but not use it for any marketing purposes until | In addition to our obligations under the Limitations Act 1980 and to Statutory bodies we retain this information because |
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| If you have been referred to us or we have provided you a quote for a Financial Service | Unsubscribe Or Have not responded to any of our email communications for 3 years | Tell us not to do so Or 6 years from your registration with us | 14 years after you register with us | We have obligations under the Financial Conduct Authority Guidelines and for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise. |
| We have provided you with a Financial Service | Unsubscribe Or Have not responded to any of our email communications for 3 years | Tell us not to do so Or 6 years from your offer being processed as not progressing by us | 14 years after we supply you with product or service. | We have obligations under the Financial Conduct Authority Guidelines and for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise. |

2) Data Retention Matrix – Interviewee, Employee, or Next of Kin

You give your consent for us to hold your information and contact you when you are registered by our staff when being offered employment, an interview or when provided as Next of Kin, you will also receive a copy of our privacy policy.

We will retain your data for the following periods of time:

| Description | We will send you marketing emails and newsletters until you | We may communicate with you by phone, email or letter until you | We will retain information on you in our systems but not use it for any marketing purposes until | In addition to our obligations under the Limitations Act 1980 and to Statutory bodies we retain this information because |
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| If you have registered for an interview with us | Unsubscribe Or Have not responded to any of our email communications for 3 years | Tell us not to do so Or 3 years from your last interview with us | 3 years after you interview with us | There is no requirement for extended retention |
| If you have been registered as an employee | Unsubscribe Or Have not responded to any of our email communications for 1 year after the end of your employment | Tell us not to do so Or 6 years from the end of your employment with us | 6 years after you have ceased employment with us | We have obligations for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise. |
| If you are registered with us as an employee’s Next of Kin | We will not send you any marketing material | We will not communicate with you unless necessary for Next of Kin purposes | 6 months after the employee for which you are Next of Kin leaves the company’s employment | We will not retain your personal data longer than is necessary as Next of Kin |

You have the right at any time to request that your data be made unavailable to all of our staff except our Data Protection Officers or Statutory Bodies with legal rights to view the data.