

# Privacy Policy

Last updated July 25, 2020

Thank you for choosing to be part of our community at Alexander Russell Estate Agents Limited, doing business as Alexander Russell Estate Agents (“**Alexander Russell Estate Agents**”, “**we**”, “**us**”, or “**our**”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at [mail@alexander-russell.co.uk](mailto:mail@alexander-russell.co.uk).

When you visit our website <https://alexander-russell.co.uk> (the “**Website**“), and more generally, use any of our services (the “**Services**“, which include the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website), as well as any related services, sales, marketing or events.

**Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.**

## TABLE OF CONTENTS

### **1. WHAT INFORMATION DO WE COLLECT?**

### **2. HOW DO WE USE YOUR INFORMATION?**

### **3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

### **4. WHO WILL YOUR INFORMATION BE SHARED WITH?**

### **5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

### **6. DO WE USE GOOGLE MAPS?**

### **7. HOW LONG DO WE KEEP YOUR INFORMATION?**

### **8. HOW DO WE KEEP YOUR INFORMATION SAFE?**

### **9. DO WE COLLECT INFORMATION FROM MINORS?**

## **10. WHAT ARE YOUR PRIVACY RIGHTS?**

## **11. CONTROLS FOR DO-NOT-TRACK FEATURES**

## **12. DO WE MAKE UPDATES TO THIS NOTICE?**

## **13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

# **1. WHAT INFORMATION DO WE COLLECT?**

## **Personal information you disclose to us**

***In Short:** We collect information that you provide to us.*

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Website (such as by posting messages in our online forums or entering competitions, contests or giveaways) or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use. The personal information we collect may include the following:

**Personal Information Provided by You.** We collect names; phone numbers; email addresses; mailing addresses; contact preferences; contact or authentication data; and other similar information.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

## **Information automatically collected**

***In Short:** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Website.*

We automatically collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about who and when you use our Website and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called ‘crash dumps’) and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet or other device you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, operating system configuration information.
- *Location Data.* We collect information data such as information about your device’s location, which can be either precise or imprecise. How much information we collect depends on the type of settings of the device you use to access the Website. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Locations settings on your device. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

### **Information collected from other sources**

***In Short:** We may collect limited data from public databases, marketing partners, and other outside sources.*

In order to enhance our ability to provide relevant marketing, offers and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, as well as from other

third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs and custom profiles, for purposes of targeted advertising and event promotion.

## 2. HOW DO WE USE YOUR INFORMATION?

***In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and logon process.** If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.
- **To post testimonials.** We post testimonials on our Website that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the consent of the testimonial. If you wish to update, or delete your testimonial, please contact us at [mail@alexander-russell.co.uk](mailto:mail@alexander-russell.co.uk) and be sure to include your name, testimonial location, and contact information.
- **Request feedback.** We may use your information to request feedback and to contact you about your use of our Website.
- **To enable user-to-user communications.** We may use your information in order to enable user-to-user communications with each user's consent.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
  
- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention).

- **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
  
- **Fulfill and manage your orders.** We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Website.
- **Administer prize draws and competitions.** We may use your information to administer prize draws and competitions when you elect to participate in our competitions.
- **To deliver and facilitate delivery of services to the user.** We may use your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
  
- **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Website, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time (see the “**WHAT ARE YOUR PRIVACY RIGHTS**” below).
- **Deliver targeted advertising to you.** We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
  
- **For other business purposes.** We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Website, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

### 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share your data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Website, which will enable them to collect data on our behalf about how you interact with our Website over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes. We have contracts in place with our data processors, which are designed to help

safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.

#### **4. WHO WILL YOUR INFORMATION BE SHARED WITH?**

*In Short:* We only share information with the following third parties.

We only share and disclose your information with the following third parties. We have categorized each party so that you may easily understand the purpose of our data collection and processing practices. If we have processed your data based on your consent and you wish to revoke your consent, please contact us using the contact details provided in the section below titled “**HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**”.

- **Advertising, Direct Marketing, and Lead Generation**  
Google AdSense, Facebook Audience Network and Loop Software Limited
- **Cloud Computing Services**  
Loop Software Limited, JotForm, Calendly, Trello, iamProperty/ MoveButler
- **Communicate and Chat with Users**  
Chaport Live Chat

- **Content Optimization**  
Google Site Search, YouTube video embed and Contact Form 7 for WordPress
- **Data Backup and Security**  
Dropbox Backup, Microsoft One Drive, iCloud Drive and Google Drive Backup
- **Invoice and Billing**  
Free Agent Accounting
- **Retargeting Platforms**  
Google Ads Remarketing , Google Analytics Remarketing, Facebook Custom Audience and Facebook Remarketing
- **Social Media Sharing and Advertising**  
Facebook advertising, LinkedIn advertising, Twitter advertising and Instagram advertising
- **Web and Mobile Analytics**  
Google Analytics and Facebook Analytics
- **Website Hosting**  
WordPress.com and Ionos by 1&1

## **5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

*In Short:*We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our [Cookie Policy](#).

## **6. DO WE USE GOOGLE MAPS?**

***In Short:**Yes, we use Google Maps for the purpose of providing better service.*

This Website uses Google Maps APIs which is subject to Google's Terms of Service. You may find the Google Maps APIs Terms of Service [here](#). To find out more about Google's Privacy Policy, please refer to this [link](#).

## **7. HOW LONG DO WE KEEP YOUR INFORMATION?**

***In Short:**We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information indefinitely.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **8. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:**We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

## 9. DO WE COLLECT INFORMATION FROM MINORS?

*In Short:*We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Website, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Website. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [mail@alexander-russell.co.uk](mailto:mail@alexander-russell.co.uk).

## 10. WHAT ARE YOUR PRIVACY RIGHTS?

*In Short:*In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the [contact details](#) provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

If you are resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

**Cookies and similar technologies:**Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website. To opt-out of interest-based advertising by advertisers on our Website visit <http://www.aboutads.info/choices/>.

## **11. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## **12. DO WE MAKE UPDATES TO THIS NOTICE?**

*In Short:* Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## **13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), Mr Russell Leask, by email at [mail@alexander-russell.co.uk](mailto:mail@alexander-russell.co.uk), by phone at 01843 269188, or by post to:

Alexander Russell Estate Agents Limited  
St Augustines Business Centre  
125, Canterbury Road  
Westgate-on-Sea  
CT8 8NL  
United Kingdom

### **How to complain**

You can also complain to the ICO if you are unhappy with how we have used your data. Our ICO Registration No. is: ZA773125

The ICO’s address:  
Information Commissioner’s Office

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>

#### **HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please visit: <https://alexander-russell.co.uk/update-contact-preferences>. We will respond to your request within 30 days.

This privacy policy was created using [Termly's Privacy Policy Generator](#).

## **Cookie Policy**

**Last updated July 25, 2020**

This site uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping baskets, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the **'About Cookies'** website which offers guidance for all modern browsers

## **Referral Fee Disclosure**

**Last updated July 25, 2020**

Generally we do not accept referral fees. We wish to remain impartial and not to have our judgement or advice compromised/ clouded by a financial consideration or conflict of interest. We may on occasion receive a referral fee from 3rd party companies or services we recommend to our clients. Where we do we will try to give the money back to the employees at that business in gifts to show our appreciation for their help and assistance. The amount we receive will normally be detailed on the quotation you receive. If not you can ask us and we will tell you exactly how much it is.

# Disclaimer

**Last updated July 25, 2020**

To the best of our knowledge, the information contained within this website is accurate.

## WEBSITE DISCLAIMER

The information provided by Thuleshore Limited trading as 'Alexander Russell Estate Agents' ("we," "us" or "our") on <https://alexander-russell.co.uk> (the "Site") is for general informational purposes only. All information on the Site is provided in good faith, however we make no representation or warranty of any kind, express or implied, regarding the accuracy, adequacy, validity, reliability, availability or completeness of any information on the Site. UNDER NO CIRCUMSTANCE SHALL WE HAVE ANY LIABILITY TO YOU FOR ANY LOSS OR DAMAGE OF ANY KIND INCURRED AS A RESULT OF THE USE OF THE SITE OR RELIANCE ON ANY INFORMATION PROVIDED ON THE SITE. YOUR USE OF THE SITE AND YOUR RELIANCE ON ANY INFORMATION ON THE SITE IS SOLELY AT YOUR OWN RISK.

Any reference to financial services does not constitute any form of financial advice.

## EMAIL DISCLAIMER

The information in this email is confidential and solely for the use of the intended recipient(s). If you receive this email in error, please notify the sender and delete the email from your system immediately. In such circumstances, you must not make any use of the email or its contents. Views expressed by an

individual in this email do not necessarily reflect the views of Alexander Russell Estate Agents. Computer viruses may be transmitted by email. Alexander Russell Estate Agents accepts no liability for any damage caused by any virus transmitted by this email. E-mail transmission cannot be guaranteed to be secure or error-free. It is possible that information may be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. This communication is from Thuleshore Limited trading as Alexander Russell Estate Agents. Tel: 01843 269188. Trading Address: St Augustine's Business Centre, 125 Canterbury Road, Westgate-on-Sea, CT8 8NL. Registered Address: 27 Old Gloucester Street, London, WC1N 3AX. Company No. 10757092 | VAT Reg No. 351374803 | TPO Member no. T05145 | ICO Reg No. ZA773125. Thank you for your co-operation.

NB. Before entering into a new agreement with any estate agent, please consider the terms if you are currently or have recently been in an agreement with another agent. If you think this may affect you, please feel free to contact us for advice on the matter.

## Complaints Procedure

We are committed to providing a professional service to all our clients and customers. If things go wrong, we need you to tell us about them. This will help us to resolve issues as soon as possible and improve our service going forward.

If you have a complaint, please put this in writing (letter or email) to us. We will acknowledge receipt and respond in line with the timescales and stages set out below. The process should take no longer than 8 weeks.

We consider the needs of the individual and, where appropriate, make reasonable adjustments for consumers who might be disadvantaged because of factors such as their age, infirmity, disability, lack of knowledge, lack of linguistic or numeracy ability, economic circumstances, bereavement or do not speak English as a first language.

### Stage 1 – Your Complaint

Please put your complaint in writing either by letter or email and address it to:

Russell Leask (Director)  
Office 24  
St Augustines Business Centre  
125, Canterbury Road  
Westgate-on-Sea  
CT8 8NL

Email: [russell@alexander-russell.co.uk](mailto:russell@alexander-russell.co.uk)

Please include as much detail as possible, including dates, names of any members of staff you dealt with, and where you are able to enclosing/attaching any supporting evidence.

## Stage 2 – Our Acknowledgement

Your complaint will be acknowledged and we will start our in-house complaints process. We will send you a letter acknowledging receipt of your complaint within three working days of receiving it.

## Stage 3 – Our Investigation

We will then investigate your complaint. This will normally be dealt with by the office manager who will review your file and speak to the member of staff who dealt with you. A formal written outcome of our investigation will be sent to you within 15 working days of sending the acknowledgement letter.

## Stage 4 – Our Final Investigation

If, at this stage, you are still not satisfied, you should contact us again and we will arrange for a separate review to take place by a senior member of staff.

We will write to you within 15 working days of receiving your request for a review, confirming our final viewpoint on the matter.

## Stage 5 – The Property Ombudsman

If you are still not satisfied after the last stage of the in-house complaint procedure (or more than 8 weeks has elapsed since the complaint was first made) you can request an independent review from The Property Ombudsman without charge.

The Property Ombudsman

Milford House, 43-55 Milford Street, Salisbury SP1 2BP

01722 333306 // [www.tpos.co.uk](http://www.tpos.co.uk) // [admin@tpos.co.uk](mailto:admin@tpos.co.uk)

**Please note the following:**

You will need to submit your complaint to The Property Ombudsman within 12 months of receiving our final viewpoint letter, including any evidence to support your case.

The Property Ombudsman requires that all complaints are addressed through this in-house complaint's procedure, before being submitted for an independent review.