Ruck & Ruck LLP Privacy Policy

This policy explains the what, how, and why, of the information Ruck & Ruck LLP collects when you register with us, or use our services. It also explains the specific ways we use and disclose that information.

Our use of your personal data is governed by this Privacy Policy. It will always be treated as confidential and in accordance with the applicable data protection legislation. Ruck & Ruck LLP take your privacy extremely seriously, and we never sell lists or email addresses.

We do not use cookies to collect information about persons visiting our website and we do not disclose information about persons visiting our website to any third parties.

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1. What is personal information and how we collect it

Personal information is any information that tells us something about you. This could include information such as name, contact details, date of birth, bank account details, or any information about your needs or circumstances which would allow us to identify you. Typically we obtain data directly from you on initial contact by phone, email or in person. We also obtain information from our affiliated third party websites.

2. The types of personal information we collect

On initial contact we will collect your full name and contact details (such as phone number, email address and postal address).

If we are providing a service to you, or on your behalf, and are required to do so by law, we will collect information to comply with Money Laundering regulations 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) and one form of documentation with proof of your place of residence (such as a recent utility bill).

3. How we use your personal information

Depending on the service that we provide to you (or on your behalf) we may also collect additional personal information as detailed below;

Selling or Letting

If you are selling or letting a property through us;

- We will collect a contact telephone number to get in touch with you about organising viewings and updating you on any offers received, or rental applications for your property.
- Where you are not the legal owner of the property we will request details from you as to your ability to sell or let the property such as a Power of Attorney, Guardianship Order or Grant of Probate.

Renting

If you are renting a property that we are listing;

- We will collect any specific access requirements you have so that we can find a property that is suitable for your needs
- Your bank / building / similar account details to allow us to manage an approved tenancy deposit account for you and to set up your rental payments.
- o If you are a tenant renting under the 'Right to Rent' scheme we will collect details of your Biometric residence card, your immigration status document and/or your birth certificate, your employers details and confirmation of your salary to carry out our required checks under this scheme.

<u>Purchase</u>

If you are purchasing a property that we are listing;

- We will collect any specific requirements you may have so that we can find a property that is suitable for your needs
- We will also collect personal information required to source a property for you and, if required, negotiate the purchase of a property on your behalf.

4. The legal basis for processing your personal information

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so. We rely on the following legal basis' to use your information;

- For employment-related purposes
- Where we need information to perform the contract we have entered into with you
- Where we need to comply with a legal obligation
- Where the processing is necessary for us to carry out activities for which it is in Ruck & Ruck LLPs' legitimate interests (or those of a third party) to do so and provided that your interests and fundamental rights do not override those interests, which includes:
 - o Processing that is necessary for us to promote our business, and service which will include sending you marketing information from time to time after you have engaged us to provide services or received services from us, which may be similar and of interest to you, and only where you have expressly indicated that you would like to receive such information.

You have the right to opt out of receiving this information at any time.

 Processing that is necessary to improve our knowledge of the real estate market this will include undertaking analysis and research so that we better understand trends in the property sector and provide better knowledge along with more tailored and relevant services for our customers in the future.

- Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively this will include: verifying the accuracy of information that we hold about you and create a better understanding of you as a customer; processing for administrative efficiency purposes; processing for network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access or to comply with a request from you in connection with the exercise of any of your rights.
- Where we need to protect your interests (or someone else's interests)
- Where it is needed in the public interest or for official purposes

5. How we share your personal information

For specific information on how we share your personal information and how it will be used for the services you have requested from us, please see below;

Buying, Selling, Renting and Letting

We use your personal information for the purposes of fulfilling our obligations to you to let or sell your property or, if you are a buyer or tenant, for the purposes of arranging a contract for sale or a lease for you.

Buying

If you are purchasing a property where we are acting as agents for the sale of, or you are selling a property through us, we will share your personal information with your appointed solicitors and the solicitors acting for the other side of the deal as is necessary to facilitate the sale or purchase.

Renting

If you are renting a property that we are acting as letting agents for, we will share your personal data with third party referencing agencies for the purposes of the prevention and detection of crime, fraud and/or money laundering and checking your suitability to rent that property. Where we are managing the property on behalf of the landlord we may need to pass your personal information on to third party contractors whom we have engaged to carry out maintenance.

In all cases in addition to sharing your personal information with any person working within Ruck & Ruck LLP in order to perform our obligations to you:

- We will share personal information with regulators, government 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:
 - o IT systems providers and IT contractors
 - Third party referencing or screening agencies for the purposes of the prevention and detection of crime
- 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 hold your personal information on our client management systems and use this to
provide you with marketing information about similar services offered by Ruck & Ruck LLP
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.

6. How long we keep your personal information

The period for which we will keep your personal information will depend on the information and the type of service you have requested from us. The retention period may be longer than the period for which we are providing services to you where we have statutory or regulatory obligations to retain personal information for a longer period, or where we may need to retain the information in case of a legal claim.

7. How we keep your information secure

The security of information is very important to us and we have measures in place which are designed to prevent unauthorised access to your personal information including but not limited to:

- Our client files are stored on our secure client management system Jupix. Access is restricted on our client systems to those within the business who are required to have access to your information for legitimate business purposes.
- Hard copy documentation is stored in locked cabinets, within the office or offsite in a secure lockup with 24hr security.

We ensure access to personal information is restricted to Ruck & Ruck LLP employees and workers or other persons working within Ruck & Ruck LLP on a need to know basis.

Training is provided to any of those Ruck & Ruck LLP employees and workers who need access to personal information.

For further information regarding your personal information, please *Ctrl + Click* on the relevant link below to view our detailed Charts:

<u>Lettings & Sales Enquirers</u>

Prospective Vendors & Landlords

Tenants & Ex Tenants

8. Your rights in relation to your personal information

You have a number of rights in relation to your personal information, these include the right to:

- Be informed about how we use your personal information
- Obtain access to your personal information that we hold
- Request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate

You may also request that we delete your personal information in the following circumstances:

- If Ruck & Ruck LLP is continuing to process personal information beyond the period when it is necessary to do so for the purpose for which it was originally collected.
- If Ruck & Ruck LLP is relying on consent as the legal basis for processing and you withdraw consent.
- If Ruck & Ruck LLP is relying on legitimate interests as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us continue with the processing
- If the personal information has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation)
- If it is necessary to delete the personal information to comply with a legal obligation:
 - Ask us to cease our data processing activities where you consider that:
 - personal information is inaccurate
 - our processing of your personal information is unlawful
 - where we no longer need the personal information but you require us to keep it to enable you to establish, exercise or defend a legal claim
 - where you have raised an objection to our use of your personal information

At any time:

- You may request a copy of the personal information that we hold about you. We will
 deliver this information in a commonly used electronic format. This right relates to all
 personal information that we hold about you, including information that you have
 provided to us that we need in order to perform our agreement with you, and personal
 information where we are relying on your consent to contact you
- You may object to our processing of your personal information where you believe we are relying on legitimate interests or exercise of a public interest task to make the processing lawful, where in fact this interest is not lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information, and if you do not agree you can make a complaint to the ICO
- If you would like to exercise any of your rights please contact postmaster@ruckandruck.co.uk

9. How to make a complaint or contact us

Complaints

If you have any complaints about the way we use your personal information please contact our Data Protection Officer at postmaster@ruckandruck.co.uk who will try to resolve the issue. If we cannot resolve any issue, you have the right to complain to the ICO (Information Commissioner's Office) https://ico.org.uk ICO number ZA398092.

Contact details

If you have any questions, comments or requests regarding any aspect of this Privacy Policy, please do not hesitate to contact us by sending an email to postmaster@ruckandruck.co.uk or writing to The Data Protection Officer, Ruck & Ruck LLP, Suite 15, 28 Old Brompton Road, London SW7 3SS.

We keep this Policy under regular review, the last review was on 31st March 2025. This Privacy Policy was last updated on 31st March 2025.