

Sequence Auctions - Privacy Notice (last updated on 25/05/2018)

1. Who we are

This Privacy Notice applies to the use and processing of personal information collected by Sequence (UK) Ltd. The ICO Registration number of Sequence (UK) Ltd. is Z8920800.

The phrases “us”, “we” or “our” will mean those businesses which are part of Sequence (UK) Ltd. on behalf of and in respect of whom this Privacy Notice is made.

For information concerning the collection, use and processing of personal information by any of our third party business partners or suppliers, please contact our representative with whom you usually deal.

2. Information covered by this Privacy Notice

- (i) **Personal data.** This is information, or any combination of separate pieces of information, that could be used to identify you
- (ii) **Special categories of personal data.** This is information which is classified as sensitive (for example details of your health)

Please read this Privacy Notice carefully. If you have any questions about this notice or our use of your personal data, please contact the Connells Group Data Protection Officer by email to DPO@connellsgroup.co.uk or in writing to Cumbria House, 16-20 Hockliffe Street, Leighton Buzzard, Bedfordshire, LU7 1GN.

Sequence (UK) Ltd. is part of the Connells Group, and all data protection matters are managed at Group level. Information concerning the make-up of the Connells Group can be found by visiting

<http://www.connellsgroup.co.uk/our-group>

3. Where we get personal information from

When you enquire or register for products and services provided by Connells Group, we may collect personal information from a variety of sources, including:

- Information we collect directly from you, either through face to face contact, by telephone, email or electronic communications such as messaging or through the internet
- Information we collect when you visit or create an account on our websites
- Information provided to us by third parties
- Information from publically available sources, for example, Land Registry

4. What information we collect

4.1 Information we collect directly from you

Depending on the type of service or product we are discussing, the following are examples of information we may collect directly from you:

- Name
- Date of birth
- Email address
- Postal address
- Telephone number
- Information about your health
- Payment information, such as a credit card and bank account details
- Your communication and marketing preferences

We may, during the course of your relationship with us, request additional information from you which is relevant to the provision of specific services.

Any telephone calls either to or from our customer service teams may be recorded for training, monitoring, compliance and security.

4.2 Information we collect when you visit our web sites

We use cookies and other technologies to collect information when you visit our web sites. Details of how we use cookies are provided in Section 13 'Our Use of Cookies'.

4.3 Information we obtain from third parties

Where we are required by law, or for business needs, we will obtain information about you from third parties, but only after we have your agreement to do so. For example (but not limited to) the third parties we may need to contact are credit reference agencies, banks, employers, accountants and solicitors in order to obtain references, undertake identity verification and basic criminal record checks, and validate your income level and financial history.

5. Who we share your information with

We may share your information both within the Connells Group of companies and also relevant third party business partners.

Where we engage third party service providers to provide products (such as mortgages, conveyancing, legal documents) or other business services and operations, we provide them with only the personal information they need to perform the service we request. We contractually require them to securely protect information, and not to use it for any other purpose.

We also provided a link from our website to Google Maps, to show the location of a branch or a property, and to allow you to input your postcode to get directions. If you use or access Google Maps you are bound by the Google Maps/Google Earth Additional Terms of Service https://maps.google.com/help/terms_maps.html including the Google Privacy Policy <https://www.google.com/intl/ALL/policies/privacy/index.html>

6. How we use your information

We will process the information you provide or we obtain from other sources to provide you with products and services and answer any questions you may have.

The following are examples of how we use the information we collect:

- To process your registration and confirm your identity
- To arrange survey and valuations
- To provide conveyancing services
- To provide will writing and associated legal services
- To provide property auction services
- To create and manage your on line account
- To process payment for our services
- To protect against and prevent fraud, unauthorised transactions, money laundering, tax evasion, claims, other liabilities and manage risk exposure and agent or franchise quality, integrity, compliance and security of business processes
- To provide, administer and communicate with you about Connells Group products, services, offers, programs and promotions, their issuers, acquirers, retailers and partners
- To operate, monitor, evaluate and improve our products, services and websites
- To evaluate your interest in and suitability for employment

6.1 Customer Surveys

From time to time we may provide your information to our customer service agencies for research, survey and analysis purposes so that we can monitor and improve the services we provide. We or our agents and sub-contractors may occasionally contact you including by post, email or telephone to ask you for your feedback and comments on our services.

6.2 Information about our products and services

We may also use your personal data to contact you by post, e mail, telephone or other electronic means to provide you with information about products and services from the Connells Group and carefully selected third parties which we feel may be of interest or relevant to your needs.

Please see Section 12 for information about how you can exercise your rights.

6.3 Credit scoring

Some of the services provided by third parties may involve an automated decision and/or credit scoring to determine whether we are able to provide a service or product.

Using third parties to undertake searches and collate information on our behalf helps make fair and responsible decisions. When coming to these decisions we and third parties will consider:

- the information provided on the application form
- information about previous account conduct , including any payment arrears and
- official public records information such as fraud record information and insolvency records

Any credit scoring methods used by third parties are regularly tested to ensure they remain fair, effective and unbiased.

For further information about automated decisions or credit scoring, please contact the Connells Group Data Protection Officer by e mail at DPO@connellsgroup.co.uk

7. Lawful basis of processing

Connells Group processes your information under any of the following lawful conditions:

- (i) **Performance of a contract** - this is where the collection and processing of your data is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract
- (ii) **Legal obligation** - this is where the collection and processing of your data is necessary for compliance with a legal obligation, for example verification of identity and fraud prevention
- (iii) **Consent** - where we process information under consent we will seek your clear and unambiguous consent before processing your data, for example to send and/or receive marketing information from other Connells Group companies
- (iv) **Legitimate interests** - some information is processed by Connells Group Companies as part of its legitimate interests which include network and information security, direct marketing, web analytics, updating customer details, lettings, sales, and other core services provided

8. Other situations

We may transfer or otherwise process your personal information:

- As part of the sale of a Connells Group business to another company, or in relation to the purchase of another business
- When we have received your instruction to pass the sale of your property to another agent
- To enforce our terms and conditions
- When required by law and/or government authorities
- When requested by the Property Ombudsman Service or any other consumer ombudsman or trade association

9. How long we keep your information for

We will keep your information for as long as is reasonably necessary for the purposes set out in this privacy notice, and to fulfil our legal and regulatory obligations.

For further information about how long we will keep your information, please contact the Connells Group Data Protection Officer by email at DPO@connellsgroup.co.uk

10. When we communicate with you

We will send you service related communications

We may also contact you in order to provide you with information about our products and services which we believe may be of interest to you, and which relate to your needs.

11. How we communicate with you

For service related communications, we will contact you either by e mail or through the post. We may also telephone you or send you SMS messages.

We give you choices about how we communicate promotions and offers to you.

11.1 By e mail

We only send you promotional emails if you explicitly select to receive these (you opt in). You can stop receiving promotional email messages from Sequence (UK) Ltd. by following the opt-out or unsubscribe instructions provided in any e mail you receive.

11.2 By post

We only send you promotional postal mail if you explicitly select to receive these (you opt in). You can stop receiving promotional postal mail from Sequence (UK) Ltd. by following the opt-out or unsubscribe instructions included in those communications.

11.3 Telephone

We will only contact you by phone for promotional reasons if you explicitly select to receive these (you opt in). You can opt out of receiving promotional telephone calls from Sequence (UK) Ltd. by informing our telephone agents.

12. Your statutory rights

You have a number of rights concerning the personal information we use. These include the right to:

- ask us *for access to a copy* of your personal information we hold about you
- ask us *to correct* your personal information
- ask us *to delete* your personal information

You can delete your online account at any time. This will delete any personal information in your account that we have about you, and it will mean any data about how you've used the online account will be made anonymous.

However, deleting your online account will not delete any data you've shared with us for reasons that are not connected with your online account. If you wish us to delete your data which is unconnected with your online account, please contact us as described below

- *withdraw your consent* to use your personal information

Where you have provided consent for our processing of your personal data, you may withdraw that consent at any time. If you withdraw your consent, your previous consent will remain valid in respect of our use of your data in relation to good or service we are still contracted to provide

If you would prefer not to receive information from the Connells Group or carefully selected third parties you can opt out by contacting your local Estate Agency Branch, or by emailing unsubscribe@sequencehome.co.uk

You can also update your communication preferences at any time via your online account.

We will act to respond to your request to stop receiving promotional email, phone, text or postal messages from Connells Group as quickly as is practicable (around 10 working days, as systems take time to replicate). We will keep information for record keeping purposes, to ensure we fulfil your request not to send particular types of messages.

- ask us to *restrict the use* of your personal data, including direct marketing
- *object to* our use of your personal data
- *object to an automated decision*, including profiling (for example, in terms of credit risk)
- *lodge a complaint* with the Information Commissioner's Office, if you object to the way we use your personal information. For more information please go to www.ico.org.uk

If you wish to make a request for access to a copy of your personal data, please write to the Connells Group at Group Legal Services, Bridgegate House, 5 Bridge Place, Lower Bridge Street, Chester CH1 1SA or email DSAR@connells.co.uk

If you wish to exercise any of your other rights, please write to the Connells Group Data Protection Officer at Connells Group, Cumbria House, 16-20 Hockliffe Street, Leighton Buzzard, Bedfordshire, LU7 1GN or e mail DPO@connellsgroup.co.uk

We will acknowledge your request and let you know what we will need from you to carry out your request. Every effort will be made to respond to or comply with your request as quickly as possible, and we will ensure our systems are updated as soon as is practicable in response to your request.

13. Our use of cookies

A cookie is a small file placed on your device when you visit a website that can be understood by the site that issued the cookie. We use the information collected by cookies to remember who you are to log you in and to store your preferences when using a particular site. It may contain a unique identifier to ensure that you are not shown the same information and/or are only shown information you have stated that you are interested in.

A cookie records your preferences when using a particular site, ensuring that you are not shown the same information and/or are only shown information you have stated that you are interested in. In order to use the Site you agree to let cookies be saved as they are an important part of navigation of the Site.

The following are examples of information we may collect:

- Information about your device browser and operating system
- Your internet protocol (IP) address assigned to your internet service
- The web pages you visit on our websites
- Any embedded links you view

We also use the cookie to allow you to log into the MyAccount part of the site. This will store some personal information (e.g. first name, last name, email address, phone number) that may be used should you need to fill out an enquiry form. This information is removed when you log out of MyAccount, or when your session expires.

13.1 Third party cookies used on the site

We use Google Analytics to provide us with information about your visit to our website. We do this in order to help improve our website service to customers.

Their cookies typically store anonymous aggregated information such as whether a visitor has been to the site before, and the time of the current visit.

We or our third party advertisers may also use cookies to monitor the effectiveness of advertising on the site.

13.2 Other Technologies

Our security software may use your IP address and browser version to help protect our systems and provide diagnostic information in the case of an issue.

14. How we protect your information

We store your personal information on our computer systems and in our paper records. We have implemented strict security procedures to ensure that personal information is not damaged, destroyed or misused, and to prevent unauthorised access to your information.

The information that we collect is stored in a secure facility with restricted physical access.

We also use a number of security measures to prevent electronic access.

Where - in line with this Privacy Notice - information is shared with third parties, similar security measures are used to protect your information.

15. Data Transfers

We ourselves do not currently transfer the personal information we collect about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information.

If in the future we or our partners need to transfer your information to recipients in other countries we will:

- (i) perform those transfers in accordance with the requirements of applicable law and subject to appropriate safeguards, and
- (ii) protect the transferred personal information in accordance with this Privacy Notice

16. Children's privacy

We do not offer any products or services to children. In certain circumstances (for example a mortgage application) we may need to collect the name and date of birth of children from mortgage applicants, and share this with the selected mortgage provider.

17. Links to other websites

Our websites, other electronic portals and documentation may provide links to other websites for your convenience and information. These may operate independently from us and have their own privacy notices or policies, which we strongly suggest you review.

Where linked websites are not owned or controlled by us, we are not responsible for their content or data privacy practices.

18. Our Promise to you

When you provide us with this information, you agree to the collection, use and sharing of your information in accordance with this data privacy notice. Our promise to you is that

- We'll work with other businesses to put together offers we think you might like
- You are in control of your data

- You can change your privacy settings at any time
- If you don't think the data is correct tell us and we'll put it right
- We will keep your data secure
- We also promise to collect, process store and share your data safely and securely and to make sure the businesses we work with do the same

19. Updates to our Privacy Notice

We will occasionally update our Privacy Notice, so we suggest that you review this Notice from time to time. If we make substantial changes to our Privacy Notice, we will endeavour to inform you directly about these changes.