

THE ZOE NAPIER GROUP

Privacy Statement, General Data Protection Regulation Compliance and Company Information

This statement informs you of the regulatory details surrounding our company, and the data that we hold about you, and how we might use and share that data. It also includes how you can limit our use of your data, and states that we may only contact you according to your preferences and for the purposes you have agreed to. This ensures we safeguard your data and privacy in accordance with the Data Protection Regulation (GDPR) as it applies in the UK, tailored by the Data Protection Act 2018, and in accordance with the UK Information Commissioner's Office (ICO) guidance, statutory ICO codes of practice, and European guidance published by the European Data Protection Board (EDPB).

Company Details

Office Address:

Zoe Napier Group
The Toll House
Fullbridge Quay
Maldon
Essex
CM9 4LE

Tel. 01621 840333
Email: info@zoenapier.co.uk

The Zoe Napier Group is a trading name of Zoe Napier & Associates Limited

Registered Address:

RICHARD EDWARDS GROUP LLP
The Maltings Rosemary Lane
Halstead
Essex
CO9 1HZ

Registered in England No. 07253534
VAT No. GB 104276737

The company has public liability and professional indemnity insurance



Data Use

We will only use your data in the ways that you have agreed with us or if you are wishing to commit to a sale or purchase through us.

We only store the minimum amount of data required for us to complete the business transactions requested by you and required for that purpose.

We may use your data within our own business Marketing Department to contact you over properties, services or products that you may be interested in.

In order for us to complete certain business transactions as part of your contract or enquiry with us, your information may need to be shared with trusted third parties with whom we are satisfied conform to the same privacy and data protection regulations as ourselves.

Your data may be used by us for mandatory compliance and validation checks in accordance with our regulator and the statutory regulations applicable to our business. These checks are automated and performed on our behalf by a trusted third party (Smartsearch). These checks are made at the start of property transactions including (but not limited to) sellers wishing to appoint the Zoe Napier Group to market their home, and buyers (whether an offer is accepted or not) who make a formal offer on any property within the Zoe Napier Group portfolio.

Smartsearch are an Industry recognised body for streamlining verified data on individuals (both UK & International individual checks), Trusts and business checks to allow the Zoe Napier Group to comply with their legal obligations of due diligence in respect to Anti Money Laundering, Sanctions & PEP screening, Monitoring (and retrospective checks), KYC & CDD (customer due diligence), EDD (enhanced due diligence), Fraud Prevention and Triple Check.

We may use your data to conduct our own research and analysis to enable us to improve our products and services.

We will never disclose your data to any non-trusted third party, nor any trusted party that is not relevant to your requested or required business transactions with us.

Data we collect and hold about you

Any or all of the following data may be collected and held by us after your consent to do so. Note that we may not collect all this information at one time, since we only hold data relevant for your needs and preferences (see "Data Use" below). We make use of a trusted third party (Smartsearch) for compliance data validation.

We collect personal data about you including data from certain third parties and other sources (such as from publicly available sources where permissible).

The data obtained will be regularly (automated) checked and updated throughout the process of your sale or purchase through the Zoe Napier Group.

We have set out below the types of personal data we will collect:

- Name and contact details;
 - such as first and last name, email address, postal address, phone number and other similar contact data
- Personal identification numbers;
 - such as your social security number or national insurance number, driving license number or passport number



- Family circumstances information;
 - your marital status and dependents if you are a PEP or a close associate of a PEP
- Employment or role details;
 - for example the organisation you work for, public roles (including political, diplomatic, religious, judicial, military and trade union roles), your job title and education history
- Professional and personal affiliations;
 - organisations and individuals that you may be associated with in your professional or personal capacity
- Financial information relevant to understanding your income or wealth;
 - for example bankruptcy or insolvency filings
- Your inclusion (if any) on sanctions lists or on public lists of disqualified directors or other positions of responsibility
- Public domain data about actual or alleged money laundering or terrorist financing crime
- Information about our dealings with you;
 - such as what information we have sent you, who in our organisation knows you, and what meetings, events or webinars you have attended. It also includes your behaviour in response to our interactions with you, such as whether you have opened our emails, clicked on a link or watched a video.
- Information about the device you are using to access our websites;
 - such as the type of device, its operating system, browser, its IP address, and what cookies are on it
- Information about your use of our websites;
 - such as what pages you have visited and what content you have downloaded
- Information capture via your use of our Mobile App SmartIDV;
 - this may include but is not limited to your passport, driving license, ID card, and residency permits
- We may also receive information about you from third party service providers such as credit reference agencies, fraud detection agencies and registration or stockbroking industry exchanges
- We may also receive personal data from third party social media services such as Google, LinkedIn and Facebook, or other commercially available sources. We do not control the information on you that such networks obtain, or the technology they use to do so
- Some of the personal data we collect about you may be special category data, as defined in the Data Protection Laws. We will only collect and use this information if the Data Protection Laws allow us to do so and will take extra care with this data. We generally process special category data for reasons of substantial public interest on the basis of applicable law.
Special categories of data includes information about:
 - Physical and mental health
 - Sexual orientation
 - Racial or ethnic origin
 - Political opinions
 - Religious and/or philosophical beliefs
 - Trade union memberships
 - Criminal convictions and offences
 - Genetic and biometric data
 - Health data including gender

More information about Smartsearch can be found via <https://www.smartsearch.com/privacy-policy>



Data Retention and Security

This data will be retained by us for a maximum period of 5 years from the last transaction date with you.

Your data is securely held on our office systems that have suitable protection from physical, virtual, local, remote or other types of malicious attacks.

We have implemented and follow strict security procedures and processes to ensure only authorised personnel access your data for the uses that you have agreed to.

Your Rights

You have the following rights as defined under GDPR (see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>)

- The right to be informed of the data we hold about you
- The right of access to your data
- The right to rectification of incorrect data
- The right to erase your data from our systems (we may, however, have an over-riding regulatory and legal obligation to retain your data for the full 5 year period, in which case we will inform you that full erasure is not possible, what data we are retaining, and the reasons why)
- The right to restrict processing of your data
- The right to data portability (sharing of your data)
- The right to object to the way we use your data
- Rights in relation to automated decision making and profiling

You may contact us at any time to update your preferences, or to make a request regarding any of the points above by emailing: info@zoenapier.co.uk

Your Agreement

We have various methods by which you can agree to the data we hold, your preferences, and how it is used. These may be via online systems, email, or a written contract as part of our normal business transactions with you.

You can request the amendment or removal of your data at any time by contacting us as detailed above.

By submitting your information to us, you consent to the terms of this policy.