

## **1. Introduction**

Savills is committed to ensuring that your privacy is protected and our use of your personal information is governed by this Privacy Notice. On this site, "Savills", "our" and "we" each mean all the UK companies in the Savills plc group (including but not limited to Savills plc, Savills (UK) Limited, Savills Management Resources Limited, Prime Purchase Limited, Savills Advisory Services Limited, Savills Capital Advisors Limited and Savills Investment Management LLP and their respective subsidiaries) which collect and use your information in the manner set out in this Privacy Notice. Any reference to "you" or "your" refers to anyone whose personal information we process.

Our use of your personal data will be governed by this Privacy Notice.

Savills is a controller for the personal information that it collects and uses about you. We will treat your personal information as confidential and in accordance with applicable data protection legislation and your personal information will only be shared with others in accordance with this Privacy Notice.

This Privacy Notice explains;

- What personal information is
- How we collect your personal information
- The types of personal information we collect
- How we use your personal information
- The legal basis for processing your personal information
- How we share your personal information
- How long we keep your personal information
- How we keep your personal information secure
- Overseas transfers of your personal information
- Your rights in relation to your personal information
- How to make complaints and how to contact us

If there are any changes to the way in which your personal information is used, this Privacy Notice will be updated.

## **2. What is personal information?**

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.

Some personal information is classified as "special" data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious beliefs or political opinions and sexual orientation. This information is more sensitive and we need to have further justifications for collecting, storing and using this type of personal information. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data.

Any references to **personal information** in this privacy notice will include personal data, and where relevant, special categories of personal data.

### **3. What personal information do we collect?**

We will collect your **full name and contact details (such as phone number and email address)** from you whenever you engage with us.

We will also confirm whether you have any relatives or close connections working at Savills so that we can consider potential conflict of interests and if identified how to manage these, in accordance with our statutory and regulatory obligations.

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

#### **Buy, Sell, Let, Rent**

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.
- We will collect your bank account details to arrange onward payment of rent due to you

If you wish to rent a property we are listing;

- Specific access requirements 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.
- 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 to carry out our required checks under this scheme

If you wish to purchase a property we are listing for sale where you have specifically provided us with these, we will collect personal information relating to any specific access requirements you may have in relation to a property 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, where required, negotiate the purchase of a property on your behalf.

#### **Other**

If you subscribe to receive research, news or other market updates from us, then in addition to the above we will collect details about the sector in which you work and the type of content that you would like to receive.

### **4. How we use your personal information**

#### ***What is the legal basis of our data processing?***

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 bases to use your information;

- 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 Savills legitimate interests (or those of a third party) to do so and provided that your interests and fundamental rights do not override those interests, including: Processing that is necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns. – this will include sending you marketing information from time to time after

you have engaged us to provide services or received services from us either which may be similar and of interest to you or 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 sector – this will include undertaking market 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 such as where we outsource certain administrative functions to third parties who are specialise in such services; 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 outlined below.

In more limited circumstances we may also rely on the following legal bases:

- Where we need to protect your interests (or someone else's interests); and/or
- Where it is needed in the public interest or for official purposes

We may process special categories of personal information and criminal conviction information in the following limited circumstances:

- With your explicit consent, in which case we will explain the purpose for which the information will be used at the point where we ask for your consent.

### **How we use your personal information**

For specific information on how your personal information will be used for the services you have requested from us, please select from any of the options below:

- **Buy, Sell, Let, Rent**

- 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.
- If you are purchasing a property we are acting as agents for the sale of or 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.
- If you are renting a property we are acting as letting agents of, 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.

- **Investment**

- Where you engage us for portfolio management services we will share your personal information with third party lenders as is necessary to allow us to fulfil our obligations to you, to raise finance for you and to properly manage and advise you on your property investments.
- Where you engage with Savills Investment Management we will collect and hold your personal data to maintain a register of investment holdings in order to comply with our Financial Conduct Authority requirements. Our registers are held by a third party administrator, Langham Hall UK LLP.

- **Other uses of your Personal Information**

- 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 share personal information with our regulators, governmental or quasi-governmental 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 IT systems providers and IT contractors as well as third party referencing or screening agencies for the purposes of the prevention and detection of crime.

- We may share your personal information with any person working within the Savills Group on a need to know basis to ensure we are able to perform our obligations to you.
- 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 Savills 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.

#### **What happens if you do not provide information that we request?**

We need some of your personal information to perform the services you have requested from us. For example:

- where we are selling a property on your behalf we need to know your contact information so that we can update you with information on viewings, offers and the progress of the sale;
- where you have asked us to find you a property which meets certain access requirements, we may need to know some further details about your particular circumstances so that we can find you a suitable property;

We also need some information so that we can comply with our legal obligations. For example, we may need identity documents from you to meet our obligations to prevent fraud and money laundering.

If you do not provide the information required for these purposes, we will not be able to perform our contract with you and may not be able to provide services to you or continue to provide certain services to you. We will explain when this is the case at the point where we collect information from you.

#### **5. How to 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 systems. 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

All data is hosted in datacentres which have systems and protections in place to protect against both unauthorised access, and other external factors that could cause damage to, your personal data. There are strict access requirements in place and access is restricted to those absolutely necessary.

We ensure access to personal information is restricted to Savills employees and workers or other persons working within the Savills Group on a need to know basis. Training is provided to any of those Savills employees and workers who need access to personal information.

#### **6. For how long do we keep your personal information?**

The period for which we will keep your personal information will depend on 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. Overseas transfers of your personal information**

We may transfer, store, or process your personal information in locations outside the UK and the European Economic Area (EEA). Where the countries to which your personal information is transferred do not offer an equivalent level of protection for personal information to the laws of the UK, we will ensure that appropriate safeguards are put in place.

We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the European Commission Justice website.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here on the European Commission Justice website.
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. You can find out more about data protection on the European Commission Justice website.

## **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
- Request that we erase your personal information in the following circumstances:
  - If Savills 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 Savills is relying on consent as the legal basis for processing and you withdraw consent
  - If Savills 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 restrict 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
- Request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal 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 consent to process your personal information

- Object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing 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
- Not be subject to wholly automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights please write to us at: [kontakt.rodosavills.pl](mailto:kontakt.rodosavills.pl).

## 9. Complaints and Contact Details

### ***Complaints***

If you have any complaints about the way we use your personal information please contact the Customer Relations Officer at [complaints@savills.com](mailto:complaints@savills.com) who will try to resolve the issue. If we cannot resolve any issue, you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK, in Poland: Chairman of the Office for Personal Data Protection). If you need more information about how to contact your local data protection authority please let us know by contacting [data@savills.com](mailto:data@savills.com).

### ***Contact details***

If you have any questions, comments or requests regarding any aspect of this Privacy Notice, please do not hesitate to contact us by sending an email to [kontakt.rodosavills.pl](mailto:kontakt.rodosavills.pl) or writing to Savills Sp. z o.o, al. Jana Pawła II 22, 00-133 Warsaw.

## 10. How do we use cookies?

### ***What are cookies?***

Cookies are small text files that are IT data, downloaded on your computer when you visit certain websites and allows websites to recognise a user's computer. Cookies are used to help users navigate websites more efficiently and to perform certain functions, as well as to provide information to the owners of the website. Part of the information may remain on the device after closing the internet browser.

Most web browsers accept collecting cookies automatically. Settings on your browser concerning cookies are crucial when it comes to the consent to use cookies by the data controller – in accordance with appropriate provisions of law the consent may be given by adjusting the settings of the browser. In case you do not give such consent, you may change your cookies setting by adjusting your browser preference.

More detailed information how to modify or adjust settings related to cookies as well as their removal and blocking are available in your browser's help.

### ***Why do we use cookies?***

On our website we use the cookies indicated in the table below. The table below lists the cookies used by this website and provides a description of how each cookie works, clicking the '+' symbol will expand the box to give further explanation on each cookie. Where further information about a cookie exists on an external website a link has been provided under 'More information'.

Two types of cookies are used on this website:

- session cookies (temporary) – temporary files stored on your device until you log out, close the browser or close the software;
- perpetual cookies – remain on a user's device for a set period of time specified in cookie settings until user removes them.

## Google Analytics

### **Purpose**

The Savills Website uses Google Analytics, a web analytics service provided by Google. This sets a cookie in order to evaluate your use of our website and compile reports for us on activity of our website. Google may also transfer this information to third parties where required to do so by law, or where such third parties

process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

#### **More information**

How to reject or delete this cookie: <http://www.google.com/intl/en/privacypolicy.html>

#### **Marketizer**

##### **Objective**

Savills website uses Marketizer tools which can automatically find available information concerning the site visitors, i.e. their company name, address, e-mail address and phone or social media profiles. Marketizer retrieves precise information on the visitors' behaviors i.e. in that way and how long they use the website, how many and which subpages are displayed and how the visitor have reached the website. The data may then be used to contact your company and present our offer within the limits of and pursuant to applicable law. The use of Marketizer services requires implementing a tracking code into the code of our website. Any personal data retrieved from the reports generated from Marketizer tools will be stored for up to 3 months.

##### **More information:**

For more details on Marketizer tools, visit <http://www.marketizer.pl/>

#### **Polylang**

Polylang uses a cookie to remember the language selected by the user when he comes back to visit again the website.

##### **More information**

<https://polylang.pro/doc/is-polylang-compatible-with-the-eu-cookie-law/>

How to reject or delete this cookie: <https://kb.webtrends.com/articles/Information/Opting-out-of-Tracking-Cookies-1365447872915>

#### **11. Amendments of the Privacy Notice.**

Savills is entitled to amend the Privacy Notice, in particular:

- it is necessary to adjust the Privacy Notice to applicable provisions of law or to make editorial changes in Privacy Notice;
- the revision of controller data set out in Privacy Notice is required;
- changes to the content, modifications or properties of website occur;
- any other circumstances provided by law.

The Privacy Notice will be amended by posting updated Privacy Notice on the website.

Savills will notify the relevant amendments and the date of their entry, by posting message and updated Privacy Policy on the website, no later than 7 days before the entry of changes into force.

By continuing to use the website following any amendments, you agree to be bound by the new Privacy Policy.

The Privacy Notice will be in force from: 27<sup>th</sup> July 2018