

Privacy Policy

Commitment

Savvas Michael Investments Limited is committed to conduct business in compliance with the highest professional standards and to complying with all laws, regulations and other requirements which govern us. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event that you have a complaint.

When we use your personal data we are regulated under the General Data Protection Regulation (“GDPR”) which applies across the European Union (including in the United Kingdom) and the Data Protection Act 2018 (“DPA”). We are responsible as ‘controller’ of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, DPA other relevant UK and EU legislation and our professional duty of confidentiality.

Scope

The scope of this policy embraces all clients and external service providers.

Savvas Michael Investments Limited is involved in the provision of property finder services (“the Services”) to individuals and corporate entities. When engaging external service providers this also includes individuals and corporate entities. Corporate entities are not data subjects; however, as part of these instructions personal information can be provided to us. If you are an individual whose personal information is processed by us as a result of us providing services to you or instructing you to provide services to us, we will process a variety of different information.

Approach

Savvas Michael Investments Limited has set out the following approach in relation to compliance with GDPR:

Personal data we collect about you

Clients

Personal data we will collect

Personal data we may collect depending on why you have instructed us

Your name, address and telephone number

Your National Insurance and tax details

Information to enable us to check and verify your identity, e.g. your date of birth or passport details

Your bank and/or building society details

Relevant information as required by Know Your Client and/or Anti Money laundering regulations

Electronic contact details, e.g. your email

address

Details of your professional online presence, e.g. LinkedIn profile

and mobile phone number

Information relating to the matter in which

Details of your spouse/partner and dependants or other family members

you are seeking our advice

Your financial details so far as they are relevant to your instructions, e.g. the source of your funds if you are instructing on a purchase transaction

Your employment status and details including salary and benefits,

Other information relevant to the Information to enable us to undertake a credit or other financial checks on you

\provision of the services

This personal data is required to enable us to provide the Service to you. If you do not provide personal data we ask for, it may delay or prevent us from providing the Services to you.

External Service Provider

Name, address, email address and telephone number

Payment information

How your personal data is collected

We collect most of this information from you direct however, we may also collect information:

1. from publicly accessible sources, e.g. Companies House or HM Land Registry;
2. directly from a third party, e.g.:
 - sanctions screening providers;
 - credit reference agencies;
 - client due diligence providers;
 - a referral
3. from a third party with your consent, e.g.:
 - your bank or building society, another financial institution or advisor;
 - consultants and other professionals we may engage in relation to your matter;
 - your employer and/or trade union, professional body or pension administrators;
 - your doctors, medical and occupational health professionals;

4. via our information technology (IT) systems, e.g.:

door entry systems and reception logs;

automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so. The reasons we will usually rely on are as follows:

1. to comply with our legal and regulatory obligations;
2. for the performance of our contract with you or to take steps at your request before entering into a contract;
3. for our legitimate interests or those of a third party; or
4. where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we process your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
To provide the Services to you as an Individual	For the performance of our contract with you or to take steps at your request before entering into a contract
To provide legal services to you as a	

corporate entity

For our legitimate interest or trust of a third party, i.e. to provide the Services to you

Conducting checks to identify our clients and verify their identity

To comply with our legal and regulatory obligations

Screening for financial and other sanctions or embargoes

Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator

Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies

Ensuring business policies are adhered to, e.g. policies covering security and internet use

To comply with our legal and regulatory obligations

For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you

Operational reasons, such as improving efficiency, training and quality control

For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price

Ensuring the confidentiality of commercially sensitive information

For our legitimate interests or those of a third party, i.e. to protect our intellectual property and other commercially valuable information

Statistical analysis to help us manage our practice, e.g. in relation to our financial performance, client base, work type or other efficiency measures

To comply with our legal and regulatory obligations

Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Updating and enhancing client records	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you
	To comply with our legal and regulatory obligations
	For the performance of our contract with you or to take steps at your request before entering into a contract
	To comply with our legal and regulatory obligations
	For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients about existing and new services
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations
	For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services to: —existing and former clients; —third parties who have previously expressed an interest in our services;	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former clients
Credit reference checks via external credit reference agencies	For our legitimate interests or a those of a third party, i.e. for credit control and to ensure our clients are likely to be able to pay for our services
External audits and quality checks and the audit of our accounts	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards
To recover debts or defend proceedings	To comply with our legal and regulatory obligations
To instruct you to provide a service to us as an individual external service provider	For our legitimate interest
	For the performance of a contract with you

To instruct you to provide to us a corporate external service provider

For our legitimate interest or those of a third party, i.e. to provide services to you

The table does not apply to special category personal data, which we will usually only process where one of the following applies:

- You have given your explicit consent;
- processing is necessary for the establishment, exercise or defence of legal claims or wherever courts are acting in their judicial capacity.

Promotional communications

We may use your personal data to send you updates (by email, text message, telephone or post) about legal developments that might be of interest to you and/or information about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal data for promotional purposes (see above 'How and why we use your personal data'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by contacting us via email address gillianmichael@btinternet.com

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Who we share your personal data with

We routinely share personal data with:

1. professional advisers who we instruct on your behalf or refer you to, e.g. accountants, tax advisors or other experts;
2. other third parties where necessary to carry out your instructions, e.g. your mortgage provider or HM Land Registry in the case of a property transaction or Companies House;
3. our insurers and brokers;
4. external auditors, e.g. in relation to the audit of our accounts;
5. our bank;
6. external service suppliers, representatives and agents that we use to make our business more efficient, e.g. analysis suppliers.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

Where your personal data is held

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see 'Who we share your personal data with').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal data when this occurs, see below: 'Transferring your personal data out of the EEA'.

How long your personal data will be kept

We will keep your personal data after we have finished advising or acting for you. We will do so for one of these reasons:

1. to respond to any questions, complaints or claims made by you or on your behalf;
2. to show that we treated you fairly;
3. to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

Transferring your personal data out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal data outside the European Economic Area (EEA), e.g.:

1. where your and our service provider is located outside the EEA;
2. if you are based outside the EEA;
3. where there is an international dimension to the matter in which we are advising you.

These transfers are subject to special rules under European and UK data protection law. If you would like further information please contact us.

Your rights

You have the following rights which you can exercise at any time free of charge:

1. Access - The right to be provided with a copy of your personal data (the right of access)

2. Rectification - The right to require us to correct any mistakes in your personal data
3. To be forgotten - The right to require us to delete your personal data in certain situations
4. Restriction of processing - The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
5. Data portability - The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party in certain situations
6. To object - The right to object:
 - at any time to your personal data being processed for direct marketing (including profiling);
 - in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
7. Not to be subject to automated individual decision-making - The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please email, call or write to Gillian Michael - see below: 'How to contact us'; and provide

1. enough information to identify you (e.g. your full name, address and client or matter reference number);
2. proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
3. what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information. You also have the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

How to contact us

Please contact us and/or Gillian Michael by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are:

Savvas Michael Investments Limited
TC Group
6th Floor
King's House
9-10 Haymarket
London
SW1Y 4BP

T 07956 458184

www.savvasmichaelinvestments.co.uk

Review

This policy will be reviewed at least annually by the Partners and following any changes to legislation or Client requirements in order to gauge its effectiveness and identify opportunities for continuous improvement.

We may change this privacy policy from time to time, when we do we will inform you in your preferred method of communication.

