# **Privacy policy**

Beswick Relocation Services Limited ("BRS", "we" or "us") is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you or that you provide to us, how we will look after it and how it will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about how we contact you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

## Our Privacy Promise - we promise:

- To keep your personal data safe and private.
- Not to sell your personal data.
- Not to use your personal data for marketing purposes
- To give you ways to manage and review the way we contact you
- Not to use your data for automatic decisions

**Information we may collect about you -** we may collect and process the following data about you:

- Information that you provide when filling in an enquiry form
- If you contact us or we contact you, we may keep a record of that correspondence.
- If you purchase or use a product or service from us, you will be required to provide certain information (see 'Groups of Personal Information' below) as well as financial information (such as bank details). Financial information collected is used only to reimburse you costs where applicable.
- We may also ask you to complete surveys that we use for feedback purposes, although you do not have to respond to them.

## Contract

In providing us with your contact details and other information to allow us to deliver services to you (or your company), this will, in most cases, give us a lawful basis and/or fulfilling contracts to process your personal data in accordance with this policy. If we believe that the use of the information may include other uses not covered by this privacy policy, we may specifically ask for your express consent.

## **Groups of Personal Information**

We only collect information that is relevant to our remit and objectives, to do this we use different kinds of personal information, and group them together like this.

Type of personal information	Description
Contact	Your name, where you live and how to contact you.
Current Circumstances	An overview of your current situation, accommodation arrangements and commitments in your existing location
Historical information	History of where you have lived
Family	Overview of your immediate family who may be relocating with you or have an impact upon your move and our remit. This may include information for education, travel and accommodation needs.
Intentions, requirements and priorities	An understanding of what you are planning to do in respect to your move, including property requirements, interests, priorities budget and new location.
Expectations	An understanding of what you have already been offered and what you may expect to receive
Timescales	An understanding of the critical timelines of your move and how and why they may affect you
Financial	Relevant financial position, status and history
Socio-Demographic	This includes details about your work or profession, nationality, and affordability
Expenditure	Claims, costs and payments made to you or on your behalf
Contractual	Details about the products or services we provide to you and/or your employer/company/business
Communications	What we learn about you from letters, emails, and conversations between us.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence etc. for anti-money laundering obligations and/or right to rent etc.
IP and Cookies	Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address. Like most websites, ours uses cookies to improve the way it shows you things, and to make access easier for you. Cookies are small files of letters or numbers that, with your permission, we put on your computer. Some stay on it for a while, others disappear the minute you close the browser.
Consents	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you,
Feedback	The feedback you provide to us over our performance and the support you have received.

#### Where we collect personal data from you

We collect personal information about you (or your business) from these sources:

- When you talk to us on the phone or in person
- When you use our portal or mobile device apps
- In emails, attachments. letters and texts
- In relocation/expenses claims or other documents
- In assessments and reviews
- In customer surveys
- Data we collect when you use our services
- Reimbursement and transaction data
- Profile and usage data. This includes the profile you create to identify yourself when you connect to our portal and mobile apps. It also includes other data about how you use those services. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software. We only may use this information for verification/security purposes and do not use this information for any marketing purposes, directly or indirectly.

#### Where we may collect personal data from third parties

- Your employer/company/business that introduce you to us
- Removal companies
- Legal property conveyancers (solicitors)
- Education advisors/institutions
- Estate/Letting agents/property consultants/serviced or holiday accommodation providers
- Inventory companies
- Credit referencing agencies
- Utility companies and local authorities (council tax)
- Banking services
- EPC suppliers
- Surveyors
- Address Lookup & Validation

## Who we may share your personal information with

We may share your personal information with companies within Beswick Relocation Services and those organisations essential in the planning and delivery of our services to you.

- Panel and non-panel suppliers directly related to our remit and your support i.e. removal companies, letting/estate agents, property consultants, education advisors/institutions who we use to help support our services and products. You will be notified who the relevant suppliers are.
- Credit referencing agencies in relation to temporary accommodation, rental and purchase
- HM Revenue & Customs, regulators and other authorities
- Your employer/company or business that introduce you to us
- Fraud prevention agencies where requested
- Other companies you ask us to share your data with.
- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them during any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private and you will be notified in advance.

Where it is agreed to share your personal data with such parties we will do so only in fulfilling our contract with you.

Beyond this we will not share your information with any other company without your consent unless we are required to do so by law, We will never sell your information to any other company for marketing purposes.

#### How the law protects you

As well as our Privacy Policy and promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Beswick Relocation Services. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for	Our reasons	Our legitimate interests
<ul> <li>To manage our relationship with you and your employer/company or business.</li> <li>To get to know your circumstances to develop relocation solutions seamlessly .</li> <li>To develop new ways to meet our customers' needs and to grow our business</li> <li>To understand and learn how our customers use products and services from us</li> <li>To provide advice or guidance about our products and services.</li> </ul>	Fulfilling contracts. Our legitimate interests. Our legal duty.	<ul> <li>Keeping our records up to date, applying how our products and services may work for you and delivering our objectives.</li> <li>Developing products and services, and what we may charge for them.</li> <li>Defining types of customers for new products or services.</li> <li>Seeking your consent when and how we need to contact you.</li> <li>Being efficient about how we fulfil our legal duties.</li> </ul>
To manage how we work with other companies that provide services to us and our customers.	Fulfilling contracts. Our legitimate interests. Our legal duty.	Developing products and services, and what we charge for them. Defining types of customers for new products or services. Being efficient about how we fulfil our legal and contractual duties.

To detect, investigate, report, and seek to prevent money laundering. To manage risk for us and our customers. To obey laws and regulations that apply to us. To respond to complaints and seek to resolve them.	Fulfilling contracts. Our legitimate interests. Our legal duty.	Developing and improving how we deal with money laundering risks as well as doing our legal duties in this respect . Complying with regulations that apply to us. Being efficient about how we fulfil our legal and contractual duties.
To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit.	Our legitimate interests. Our legal duty.	Complying with regulations that apply to us. Being efficient about how we fulfil our legal and contractual duties.
To exercise our rights set out in agreements or contracts.	Fulfilling contracts.	Being efficient about how we fulfil our legal and contractual duties
Business to Business Marketing	Consent Our legitimate interests.	Developing old, new and existing relationships to advise corporate clients of new features and products

## Marketing

We <u>do not</u> use your information provided to fulfil our contracts to undertake any form of marketing although we may use your feedback on our website where you allow us to. The feedback used is completely anonymous but if you do not wish us to use any feedback you give us, such as a soundbite on our website, please let us know.

## Consent

Where we undertake marketing initiatives with former, new and existing corporate clients we will expressly provide a clear opt out/ in options.

## **Money Laundering**

We are subject to the Money Laundering Regulations 2007. In order to comply with our legal obligations, We may need to confirm your identity before we provide products or services to you or your business. Once you have become a customer of ours, we may also share your personal information as needed to help detect fraud and money-laundering risks. We can only use your personal information if we have a proper reason to do so. It must be needed either for us to obey the law, or for a 'legitimate interest'.

A legitimate interest is when we have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you.

We will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contracts you or your business has with us.

We may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime.

#### IP Address(es)

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and security. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

#### Cookies

Like most websites, ours uses cookies to improve the way it shows you things, and to make access easier for you. Cookies are small files of letters or numbers that, with your permission, we put on your computer. Some stay on it for a while, others disappear the minute you close the browser.

Here are the three types of cookies we use to help improve your experience on our Website:

'Session cookies' are like a token which records things like pages viewed as you move through the website, so you don't keep getting asked about things you've already told us. Session cookies (and the information they record) are erased when you close your browser after a browsing session.

'Tracking cookies' help us remember your details and settings for when you come back to our website in the future, which means you get easier, faster access. They stay on your hard drive until you delete them or they expire. They have various expiry dates, up to two years.

*'Web analytics cookies'* help us learn what content is most helpful for our users. They count the number of visitors, and then look at how they like to move around the website. This data helps us make your experience of the website much better because we'll know the sort of things you look for and can make sure you find them easily.

<u>No Personal Information Stored</u>: Remember, our cookies don't store information that can identify you, so no one will be able to use the information gathered by the cookies to contact you by phone, email or in any other way. Tracking is limited to the Website and never gets shared with anyone else.

Blocking Cookies: You can block cookies – just activate the setting on your browser that allows you to refuse them.

Acceptance of cookies: If your browser is set to accept cookies, our system will issue them when you visit the Website.

#### Links to other websites

We may offer links to third party websites. However, we are not responsible for the content or information collection policies of third party websites. If you visit a third party website, we advise you to review their privacy and other policies. We do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to the third party websites.

## Where we store your personal data

The data that we collect from you is held within the European Economic Area. It may also be processed by staff who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing.

## Security of personal data

Beswick Relocation Services Ltd take security of personal data information extremely seriously. All reasonable technical and organisational precautions are taken to prevent the deliberate or accidental loss, misuse or alteration of any personal information. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. All information you provide to us is stored on our secure servers using SSL certification with email TLS encrypted.

## **Data Breaches**

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We actively review our measures to prevent and monitor possible personal data breaches. Where cases are identified we will notify you as soon as reasonably possible.

## Sending data outside of the EEA

We will only send your data outside of the European Economic Area ('EEA') to:

- Companies <u>you</u> ask us to share your data with.
- Follow your clear instructions.
- Comply with a legal duty.

## If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you or your employer/company or business

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts or policies. It could mean that we cancel a product or service you have with us.

## How long we keep your personal information

We will keep your personal information for as long as you are an 'active', 'pending' or 'on hold' case of BRS. This is determined by the remit received from your employer/company or business and the dealings we have with you.

After your case has 'closed' or is 'cancelled (this is usually determined when your support has ceased, your move is complete or has been cancelled) we may keep your data for up to 7 years for one of these reasons:

- To report under our obligations to your employer/company or business
- To respond to any questions or complaints.
- To maintain records according to rules and legislation that applies to us.

## How to get a copy of your personal information

You can access your personal information we hold by emailing <u>administrator@brsuk.com</u> or by writing to us at this address:

The Data Handler - Beswick Relocation Services Limited, Church House, Parkway, Holmes Chapel, Cheshire, CW4 7BA

Please ensure you provide your full name, relationship with us, reference number (if known) address and current contact telephone number. Information requests will be provided within one month, unless the request is complex, when it may take longer. We will advise you if the request will take longer.

## Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

## What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it. We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It is not relevant any more, but you want us to keep it for use in the future.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

#### How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so (see contact details below).

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

## How to complain or Contact us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

The Data Handler - Beswick Relocation Services Limited, Church House, Parkway, Holmes Chapel, Cheshire, CW4 7BA

Alternatively, you can email <u>administrator@brsuk.com</u> phone us on 01477 533533 or by using the 'Contact Us' page online.

You also have the right to complain to the Information Commissioner's Office - https://ico.org.uk/