GREETHAM GILBERT LTD

PRIVACY POLICY

Data Controller: Greetham Gilbert Ltd

1. Introduction

At Greetham Gilbert Ltd, we are committed to protecting your privacy and ensuring that your personal information is handled lawfully, fairly, transparently and securely.

We recognise the importance of maintaining the confidentiality of the information entrusted to us by our clients, customers and other individuals with whom we interact.

This Privacy Policy explains how we collect, use, store, share and protect personal information in connection with our estate agency, residential lettings, property management, student accommodation and related services.

It also explains your rights under applicable data protection legislation and how you can exercise those rights.

This policy applies to landlords, tenants, prospective tenants, guarantors, property sellers, buyers, prospective buyers, website visitors, contractors, suppliers and other individuals who engage with our business.

We process personal information in accordance with applicable legislation, including:

- The UK General Data Protection Regulation (UK GDPR).
- The Data Protection Act 2018, as amended.
- The Data (Use and Access) Act 2025, where applicable.
- The Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), as amended.
- Other relevant UK legislation governing estate agency, lettings, property management, financial transactions and anti-money laundering.

2. Who We Are

Greetham Gilbert Ltd is an independent estate agency providing residential property sales, lettings, property management and associated property services.

For the purposes of UK data protection legislation, Greetham Gilbert Ltd is generally the data controller of personal information collected and processed in connection with our services.

Company name: Greetham Gilbert Ltd
Registered company number: 14923496
Registered office: The Basement, 25 Osborne Road, Newcastle Upon Tyne, NE2 2AH
Trading offices: Jesmond, Newcastle upon Tyne, and Park View, Whitley Bay
Website: www.greethamgilbert.co.uk
Email: hello@greethamgilbert.co.uk
Telephone: 0191 691 3344
ICO registration number: ZB561284

We determine the purposes and means of processing personal information in connection with our estate agency activities.

In certain circumstances, we may act as a processor on behalf of another data controller, or act alongside another organisation as an independent or joint controller. Where applicable, the relevant responsibilities will be established through appropriate arrangements.

For questions about this policy or how we handle personal information, please contact us using the details above.

3. Personal Information We Collect

The personal information we collect depends on your relationship with us and the services you request.

We may collect and process the following categories of information.

3.1 Identity and contact information

- Full name and title.
- Date of birth.
- Residential, correspondence and previous addresses.
- Email addresses and telephone numbers.
- Nationality, where relevant to a lawful verification requirement.
- Identification documents, including passports and driving licences.
- Photographic identification and identity verification results.
- Contact preferences.
- Details of authorised representatives.

3.2 Financial information

Where necessary for our services, we may collect:

- Bank account and payment details.
- Rental payment records and arrears information.
- Income and employment details.
- Affordability information.

- Credit referencing results.
- Deposit payment and protection information.
- Financial information relevant to property transactions.
- Source-of-funds and source-of-wealth information.
- Mortgage or finance-related information.
- Financial information required for anti-money laundering checks.

We only collect financial information where there is an appropriate lawful basis and a legitimate business or regulatory requirement.

3.3 Property and tenancy information

We may process:

- Property ownership information.
- Property addresses and descriptions.
- Valuations and marketing instructions.
- Viewing appointments and feedback.
- Offers and negotiations.
- Tenancy agreements and associated documentation.
- Occupancy details.
- Property inspection reports.
- Inventory and check-in/check-out records.
- Maintenance requests and repair histories.
- Contractor appointments.
- Rent and service charge records.
- Deposit disputes.
- Complaints and correspondence.
- Information about property condition, access arrangements and security.

3.4 Tenant referencing information

For prospective tenants and guarantors, we may collect information required to assess suitability and affordability, including:

- Employment and income details.
- Residential and rental history.
- Previous landlord references.
- Credit and affordability information.

- Guarantor information.
- Identity verification information.
- Information relevant to lawful Right to Rent checks.

Referencing may be undertaken through specialist third-party providers.

3.5 Special category and sensitive information

In limited circumstances, we may process information relating to health, disability or other special categories of personal data.

For example, an individual may disclose a disability or health condition when requesting a reasonable adjustment, accessible viewing arrangement or accommodation-related assistance.

We will only process special category information where we have a valid lawful basis under Article 6 UK GDPR and an additional condition under Article 9 UK GDPR, together with any applicable requirements of the Data Protection Act 2018.

Depending on the circumstances, this may include explicit consent or processing necessary to establish, exercise or defend legal claims.

We will not routinely request or retain special category information where it is unnecessary.

3.6 Communications and correspondence

We may retain records of communications made through:

- Email.
- Telephone.
- Online enquiry forms.
- Property portals.
- Messaging services.
- Customer relationship management systems.
- Written correspondence.
- Complaints and dispute resolution processes.

Where calls are recorded, individuals will be informed appropriately.

3.7 Website and technical information

When you visit our website, we may collect information such as:

- IP address.
- Browser and device information.
- Pages visited.
- Referral sources.
- Website interactions.

- Cookie identifiers.
- Enquiry form submissions.
- Marketing preferences.

Information collected through non-essential cookies and tracking technologies will be subject to applicable consent requirements and our Cookie Policy.

4. How We Collect Personal Information

We collect personal information through several sources.

Directly from you, including when you contact us, request a valuation, register for property alerts, arrange a viewing, apply for a tenancy, instruct us to market a property or enter into a contractual relationship with us.

From third parties, including landlords, tenants, guarantors, employers, previous landlords, solicitors, mortgage intermediaries, referencing providers, contractors, property portals and other organisations involved in property transactions.

From publicly available sources, where appropriate, including HM Land Registry, Companies House and other lawful public registers.

Through our website and digital services, including online forms, property enquiries, cookies and other permitted technologies.

Where we obtain personal information from another source, we will provide relevant privacy information within the period required by law, unless an applicable exemption applies.

5. Why We Use Your Personal Information

We only process personal information where we have a lawful basis for doing so.

The principal purposes and lawful bases are set out below.

5.1 Property sales

We process personal information to:

- Provide property valuations.
- Market properties for sale.
- Arrange and manage viewings.
- Communicate with sellers and prospective buyers.
- Receive and negotiate offers.
- Verify identity and undertake legally required checks.
- Progress transactions with relevant parties.
- Maintain transaction records.
- Handle complaints and disputes.

Lawful basis: Performance of a contract, steps taken before entering into a contract, compliance with legal obligations and legitimate interests.

Our legitimate interests include operating an effective estate agency, communicating with parties to transactions, preventing fraud and protecting our business and clients.

5.2 Residential lettings

We process information to:

- Advertise available properties.
- Register prospective tenants.
- Arrange viewings.
- Process tenancy applications.
- Conduct referencing and affordability checks.
- Verify identity and Right to Rent status where required.
- Prepare tenancy documentation.
- Arrange deposits and initial payments.
- Administer tenancy commencement and termination.
- Communicate with landlords, tenants and guarantors.

Lawful basis: Performance of a contract, steps taken before entering into a contract, legal obligations and legitimate interests.

5.3 Property management

Where we manage a property, we may use personal information to:

- Collect and administer rent.
- Maintain landlord and tenant accounts.
- Arrange repairs and maintenance.
- Manage contractors.
- Conduct inspections.
- Address tenancy-related enquiries.
- Administer deposit arrangements.
- Manage rent arrears and tenancy disputes.
- Communicate with utility providers and local authorities where necessary.
- Comply with applicable property and housing legislation.

Lawful basis: Performance of a contract, legal obligations and legitimate interests.

Our legitimate interests include maintaining properties, protecting the interests of landlords and tenants, resolving disputes and ensuring the effective administration of managed properties.

5.4 Student accommodation

We process personal information in connection with student accommodation, including:

- Student property enquiries.
- Group tenancy applications.
- Student and guarantor referencing.
- Tenancy administration.
- Rent collection.
- Property maintenance.
- Tenancy renewals and departures.
- Communication with joint tenants and guarantors.

We will only disclose information about individual tenants or guarantors to other parties where there is an appropriate lawful basis.

5.5 Anti-money laundering and financial crime prevention

We may process identity, financial and transactional information to comply with applicable anti-money laundering legislation and to prevent and detect fraud or other financial crime.

This may include:

- Customer due diligence.
- Identity verification.
- Beneficial ownership checks.
- Source-of-funds enquiries.
- Politically exposed person and sanctions screening.
- Record keeping.
- Reporting to competent authorities where legally required.

Lawful basis: Compliance with legal obligations where applicable, and legitimate interests for appropriate fraud prevention activities not subject to a specific legal duty.

We may be legally prohibited from disclosing certain information relating to financial crime investigations or reports.

5.6 Legal and regulatory compliance

We process personal information where necessary to comply with our legal and regulatory obligations, including those relating to:

- Estate agency and lettings legislation.

- Housing and tenancy legislation.
- Right to Rent requirements.
- Anti-money laundering.
- Taxation and accounting.
- Consumer protection.
- Data protection.
- Court orders and lawful regulatory requests.

Lawful basis: Compliance with a legal obligation.

5.7 Complaints, disputes and legal claims

We may process personal information to investigate complaints, respond to regulatory enquiries, resolve disputes, recover debts and establish, exercise or defend legal claims.

Lawful basis: Legitimate interests and legal obligations, as applicable.

5.8 Marketing and business development

We may use relevant contact information to provide:

- Property alerts.
- Market updates.
- Valuation opportunities.
- Information about our services.
- Newsletters and property-related communications.

Marketing communications will be sent only where permitted under applicable data protection and electronic marketing legislation.

Where consent is required, we will obtain it before sending marketing.

Where the law permits us to rely on an existing customer relationship or another applicable exception, we will comply with the relevant conditions, including offering appropriate opportunities to opt out.

We will not assume that an enquiry alone authorises unrestricted marketing.

You may opt out of direct marketing at any time.

6. Legitimate Interests

Where we rely on legitimate interests, we consider whether processing is necessary for the stated purpose and whether our interests are overridden by the rights and freedoms of the individuals concerned.

Our legitimate interests may include:

- Providing and improving our estate agency services.

- Responding to enquiries.
- Managing and maintaining client relationships.
- Administering property transactions.
- Preventing fraud.
- Protecting property and business assets.
- Maintaining appropriate business records.
- Resolving disputes.
- Ensuring the security of our systems.
- Conducting lawful business development.

We undertake appropriate assessments where required and implement safeguards to protect personal information.

7. Tenant Referencing and Credit Checks

Where you apply to rent a property, we may use a specialist referencing provider, including BLINC, to undertake appropriate checks.

These may include identity verification, credit referencing, affordability assessments, employment verification and previous landlord references.

Referencing providers may obtain information from credit reference agencies and other lawful sources.

Such checks may result in records being retained by the relevant referencing or credit reference provider in accordance with its own privacy notice.

Where a provider acts as an independent controller, its own privacy policy will apply to its processing activities.

A referencing outcome may inform a landlord's decision about whether to proceed with a tenancy.

We will provide relevant information about referencing before checks are undertaken and ensure that any automated decision-making is handled in accordance with applicable law.

8. Right to Rent Checks

Where legally required, we conduct Right to Rent checks in accordance with applicable immigration legislation.

This may involve collecting and verifying identification documents, using authorised digital checking services or reviewing information provided through government services.

We will retain relevant records for the period required by law and restrict access to authorised personnel.

Information obtained for Right to Rent purposes will not be used for unrelated purposes without an appropriate lawful basis.

9. Anti-Money Laundering Checks

Greetham Gilbert Ltd undertakes anti-money laundering checks where required by applicable legislation.

These checks may involve the collection and verification of personal information, including identity documents, residential addresses, beneficial ownership details and relevant financial information.

We may use approved third-party verification providers and lawful databases to assist with these checks.

Where required by law, we may disclose relevant information to HM Revenue & Customs, the National Crime Agency or other competent authorities.

Records subject to the Money Laundering Regulations will generally be retained for five years following the end of the relevant business relationship or completion of the occasional transaction, unless a different period is lawfully required or permitted.

10. Who We Share Personal Information With

We do not sell personal information to third parties.

We may share personal information where necessary, proportionate and legally permitted with the following categories of recipients:

Landlords, tenants, sellers and buyers: Where relevant to the property transaction, tenancy or management arrangement.

Solicitors and conveyancers: For property transactions, disputes and legal matters.

Referencing and identity verification providers: Including BLINC and other providers engaged for lawful verification and assessment.

Property management and accounting providers: Including PayProp and other authorised service providers involved in payment processing, financial administration and property management.

Customer relationship management and website providers: Including Lifesycle and relevant technology providers supporting enquiries, property marketing and customer communications.

Maintenance and repair providers: Including contractors and services engaged through Fixflo or other maintenance management systems.

Tenancy deposit protection providers: Including the Deposit Protection Service (DPS), where applicable.

Property portals and marketing providers: Where necessary to advertise properties, manage enquiries or provide lawful marketing services.

Banks and payment service providers: For the administration of rent, fees, deposits and other authorised payments.

Insurers, surveyors, inventory providers and professional advisers: Where relevant to our services.

Public authorities and regulators: Including HMRC, local authorities, law enforcement agencies, courts and other bodies where disclosure is required or permitted by law.

Debt recovery and legal service providers: Where reasonably necessary to recover sums due or resolve disputes.

Business purchasers or advisers: Where relevant to a proposed merger, acquisition, restructuring or sale, subject to appropriate confidentiality, legal and data protection safeguards.

Where a third party processes personal information on our behalf, we require appropriate contractual and security protections.

Some third parties act as independent data controllers and are responsible for their own processing activities.

We will not disclose personal information merely because another party requests it.

11. International Data Transfers

Some of the technology providers and service providers used by Greetham Gilbert Ltd may store or access personal information outside the United Kingdom.

Where personal information is transferred internationally, we will ensure that the transfer complies with applicable UK data protection legislation.

This may involve reliance on:

- UK adequacy regulations.
- The UK International Data Transfer Agreement.
- The UK Addendum to approved EU Standard Contractual Clauses.
- Another lawful transfer mechanism or exception, where applicable.

Where required, we will assess the risks associated with the transfer and implement appropriate supplementary safeguards.

Further information about applicable transfer safeguards, including how to obtain a copy where relevant, may be requested using the contact details in this policy.

12. How Long We Keep Personal Information

We retain personal information only for as long as necessary for the purposes for which it was collected, including applicable legal, accounting, regulatory and contractual requirements.

Retention periods depend on the nature of the information and the relevant legal obligations.

Our retention approach includes the following categories.

Anti-money laundering records: Generally five years following the end of the business relationship or relevant transaction, subject to statutory requirements and applicable exceptions.

Right to Rent records: For the duration of the relevant tenancy and the further period required by immigration legislation.

Financial and accounting records: For the applicable statutory accounting and taxation retention periods.

Property sales and lettings records: For the period necessary to meet legal obligations, regulatory requirements, complaint handling and the establishment, exercise or defence of legal claims.

Property management records: For the duration of the management relationship and an appropriate period afterwards, based on legal, financial and contractual requirements.

Unsuccessful applications and enquiries: For a proportionate period determined by the purpose of collection, potential disputes and applicable regulatory requirements.

Marketing information: Until consent is withdrawn, an objection is received, the information is no longer necessary or another applicable retention criterion is met. Limited suppression records may be retained to ensure that marketing objections are respected.

Complaints and disputes: For the period reasonably necessary to investigate, resolve and retain evidence of the matter, including any applicable limitation or regulatory periods.

We maintain an internal retention schedule setting out applicable periods and review records in accordance with that schedule.

When personal information is no longer required, it will be securely deleted, anonymised or otherwise disposed of in accordance with our information security procedures.

Where a legal hold, regulatory requirement or ongoing dispute applies, retention may be extended where lawful and necessary.

13. How We Protect Your Information

We take appropriate technical and organisational measures to protect personal information against unauthorised access, accidental loss, alteration, disclosure or destruction.

Our safeguards are designed to include, as appropriate:

- Restricted access to personal information.
- Individual user accounts and access permissions.
- Appropriate authentication and password controls.
- Secure systems and communications.
- Appropriate encryption and secure transfer methods.
- Staff confidentiality obligations.
- Data protection awareness and training.
- Secure document storage and disposal.
- Supplier due diligence and contractual protections.
- Regular review of access permissions.
- Procedures for identifying, investigating and responding to personal data breaches.

We review our security arrangements to ensure that they remain appropriate to the nature and risks of our processing activities.

Although we take reasonable measures to protect information, no electronic transmission or storage system can be guaranteed to be completely secure.

14. Your Data Protection Rights

Under UK data protection legislation, you have a number of rights concerning your personal information.

These rights are subject to applicable legal conditions and exemptions.

Right of access

You may request confirmation of whether we process your personal information and obtain a copy of the information to which you are entitled.

Right to rectification

You may request correction of inaccurate personal information or completion of incomplete information.

Right to erasure

You may request deletion of your personal information in circumstances where the law provides this right.

We may be required or permitted to retain information where necessary to comply with legal obligations or establish, exercise or defend legal claims.

Right to restrict processing

You may request that we restrict the processing of your personal information in certain circumstances.

Right to data portability

Where applicable, you may request that certain personal information is provided in a structured, commonly used and machine-readable format or transferred to another controller.

Right to object

You have the right to object at any time to the processing of your personal information for direct marketing purposes.

If you object to direct marketing, we will stop processing your personal information for that purpose.

You may also object to certain processing carried out on the basis of legitimate interests, subject to applicable legal conditions.

Rights relating to automated decision-making

Where applicable, you have rights relating to decisions based solely on automated processing, including profiling, that produce legal or similarly significant effects.

Right to withdraw consent

Where we rely on your consent, you may withdraw it at any time.

Withdrawal does not affect the lawfulness of processing carried out before consent was withdrawn.

To exercise your rights, please contact us using the details in Section 2.

We may request reasonable information to verify your identity before responding.

We will respond within the period required by applicable law, normally one calendar month, subject to permitted extensions or exemptions.

Requests are normally handled free of charge, although the law permits charges or refusal in limited circumstances.

15. Direct Marketing and Your Right to Opt Out

We respect your right to control the marketing communications you receive.

Where you have agreed to receive property alerts, newsletters or other marketing communications, you may withdraw your consent at any time.

Where marketing is otherwise lawfully permitted, you may object to receiving it at any time.

You can opt out by:

- Using an unsubscribe link included in an email.
- Contacting our offices.
- Emailing our privacy contact.
- Requesting that your marketing preferences be updated.

We will act on valid objections to direct marketing and may retain a limited record of your preference to prevent further unwanted communications.

Operational communications concerning an existing tenancy, property transaction or contractual relationship are distinct from direct marketing and may continue where there is a lawful basis.

16. Cookies and Website Tracking

Our website may use cookies and similar technologies to support functionality, maintain security, understand website usage and deliver permitted marketing activities.

Cookies may include:

Strictly necessary cookies: Required for essential website functionality or other purposes exempt from consent requirements under applicable law.

Analytics cookies: Used to understand website performance and visitor interactions.

Functionality cookies: Used to remember preferences and improve website functionality.

Advertising and marketing cookies: Used to measure advertising effectiveness and support relevant advertising, where permitted.

We will obtain consent before placing or accessing cookies or similar technologies where consent is required by law.

Where required, visitors will be able to reject non-essential cookies and change their preferences.

Further information, including the specific cookies used, their purposes, providers and durations, will be available in our separate Cookie Policy or cookie information panel.

17. Automated Decision-Making and Profiling

We may use digital systems and third-party services to assist with identity verification, tenant referencing, affordability assessments, fraud prevention and property-related administration.

These systems may generate scores, recommendations, verification outcomes or risk indicators.

Where a decision is based solely on automated processing and produces legal or similarly significant effects, we will comply with the applicable legal requirements, including providing information about the processing and relevant rights and safeguards.

Where such processing takes place, further information about the logic involved, its significance and likely consequences will be made available as required by law.

18. Children's Personal Information

Our services are primarily intended for adults.

However, we may process limited personal information relating to children where necessary in connection with tenancy administration, property occupancy, safeguarding, legal obligations or other legitimate property management purposes.

We will only collect information that is relevant and necessary and will apply appropriate safeguards.

We do not knowingly use children's personal information for direct marketing without an appropriate lawful basis.

19. CCTV and Office Security

Where CCTV is operated at any of our premises, personal information may be collected through recorded images for legitimate security and safety purposes.

Where applicable, appropriate signage and supplementary privacy information will explain the use of CCTV, including the purposes of recording, relevant retention periods and contact details.

CCTV recordings will be subject to appropriate access controls and will only be disclosed where lawful and necessary.

20. Providing Personal Information

Certain information is necessary for us to enter into or perform a contract with you.

Other information may be required to comply with legal obligations, such as identity verification, anti-money laundering or Right to Rent checks.

Where information is legally or contractually required, we will explain this at the relevant stage.

If you do not provide information that is necessary for a particular purpose, we may be unable to:

- Proceed with a tenancy application.
- Complete required identity or referencing checks.
- Enter into a property-related agreement.
- Process a property transaction.
- Provide certain services.
- Meet applicable legal obligations.

Information requested solely for optional marketing activities is not a condition of receiving our core estate agency services.

21. Links to Third-Party Websites

Our website may contain links to third-party websites, property portals and external services.

We are not responsible for the privacy practices of independent third-party websites.

We recommend reviewing the privacy notices of those organisations before submitting personal information.

22. Personal Data Breaches

We maintain procedures for identifying, assessing and responding to suspected personal data breaches.

Where a breach meets the relevant legal reporting threshold, we will notify the Information Commissioner's Office within the applicable statutory period.

Where a breach is likely to result in a high risk to individuals' rights and freedoms, we will inform affected individuals without undue delay, unless an applicable legal exception applies.

We will take appropriate steps to investigate incidents, minimise harm and reduce the likelihood of recurrence.

23. Complaints and Concerns

We take concerns about the handling of personal information seriously.

If you have a complaint about how we have collected, used, stored or disclosed your information, please contact us using the details provided in Section 2.

We will investigate your concerns and respond in accordance with applicable legal requirements.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's independent data protection regulator.

Information Commissioner's Office
Website: https://ico.org.uk
Telephone: 0303 123 1113
Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Where appropriate, we encourage you to contact us first so that we have an opportunity to address your concerns.

This does not remove or restrict your right to contact the ICO.

24. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in legislation, regulatory guidance, business operations or the way we process personal information.

The most recent version will be published on our website.

Where changes materially affect how we process personal information, we will take appropriate steps to bring those changes to the attention of affected individuals before implementing new processing where required.

We recommend reviewing this policy periodically.

25. Contact Us

If you have any questions about this Privacy Policy, wish to exercise your data protection rights or have concerns about the way we handle personal information, please contact:

Greetham Gilbert Ltd
Data Protection Contact
hello@greethamgilbert.co.uk
0191 691 3344
The Basement, 25 Osborne Road, Newcastle Upon Tyne, NE2 2AH

We are committed to handling your personal information responsibly, securely and transparently.

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