

PRIVACY NOTICE



This Spire Consultancy Privacy Notice provides information on how Spire Consultancy, and any of its subsidiaries, branches or representative offices and any 3rd party providers, collect, use, secure, transfer and share your information. Spire Consultancy and its affiliates is a provider of Commercial Property occupier management and professional consultancy services.

Spire Consultancy has its head office at

**2 Haben Bridge Cottages
Petersfield
West Sussex
GU31 5HS**

Spire Consultancy serves many commercial businesses and corporations.

1. Types of information collected

Typically Spire Consultancy may collect:

1. Title
2. First Name
3. Middle Name
4. Surname
5. Job Title
6. Personal Company Email Address
7. Direct Dial Work Numbers
8. Mobile Number
9. Department
10. Company Name
11. Employer / Registered Company Name
12. Employer Switchboard Number
13. Company Address
14. Company website
15. DX Exchange and DX Number
16. Employers annual turnover
17. Size of company you work for
18. Size of your property requirement
19. Type of property requirement
20. Location of property requirement
21. Tenure details of property requirement
22. Price band of property requirement
23. Landlord details
24. Subtenant details
25. Proposed and existing Lease details

2. Methods of collection

In the general conduct of business, Spire Consultancy collects information relevant to the services being sought across the range of services it offers from:

- yourself;
- the Internet;
- "trusted" sources including Property Portals;
- consented third parties disclosing information about you to us that they have collected.

Such information will generally be collected directly via the use of any of our standard forms, over the internet, via email, in our offices, from business cards handed to us by you or through direct conversation with you. We may also collect personal information through our affiliates or suppliers. In addition, you may choose to submit information directly to us via several methods, including:

- through Spire Consultancy and affiliates websites;
- in response to marketing or other communications;
- through social media;
- by signing up for a Spire Consultancy product or service;
- through participation in an offer, program or promotion;
- in connection with an actual or potential business or employment relationship with us;
- at events, meetings, conferences, and seminars.

You may also agree to third parties disclosing information about you to us that those third parties have collected.

We, our service providers and partners collect certain information by using automated means, such as cookies and web beacons, when you interact with our advertisements, mobile applications, or visit our websites, pages or other digital assets. The information we collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services on our websites and mobile apps. The analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our websites and apps.

"Your rights and choices" section of this Privacy Notice (para 9) specifies your ability, to opt out or limit the usage of the information collected.

3. Purposes of collection

Generally, we will collect, use and hold your information to:

- assess applications for and provide Spire Consultancy products / services;
- conduct business, develop relationships with Spire Consultancy and affiliates;
- process payments / transactions including: Accounting, Authorisation, Clearing, Chargebacks, Auditing, Billing, Reconciliation, Collection, Complaints, Enquiries, Credit Checks and related dispute resolution activities;
- protect against and prevent fraud, unauthorised transactions, money laundering (please see below), tax evasion, claims, other liabilities and manage risk exposure and agent /franchise quality, integrity, compliance and security of business processes;
- create and manage any accounts, associated authentication criteria (id's and passwords) you may have with Spire Consultancy;

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- provide, administer and communicate with you about Spire Consultancy products, services, offers, programs and promotions, their issuers, acquirers, retailers and partners;
- compile business directories, including business contact information;
- operate, monitor, evaluate and improve our products, services, websites, mobile applications, other digital assets and business;
- develop new products and services;
- manage communications, assess effectiveness and optimisation of advertising;
- assess and improve the functionality of our websites, mobile applications other digital assets;
- evaluate your interest in employment and contact you regarding possible employment opportunities;
- enforce Spire Consultancy "Terms of Use", other legal rights as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over Spire Consultancy or its affiliates;
- comply with industry standards and Spire Consultancy policies;
- provide focussed marketing and information.

Anti-Money Laundering

In addition, to help you with a property related service, we have to comply with certain regulations, for example the "Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to as "the Regulations)."

Spire Consultancy are required to obtain certain information from you to comply with regulations. The information provided will only be used by Spire Consultancy in relation to complying with the Regulations and will not be shared with any other party, unless we are required to do so under law.

If you decide to enter in to a business relationship with Spire Consultancy, to comply with certain regulations, we will require two separate and different Identification documents, one primary and one secondary document, even if it appears on both lists. The information may be required at various stages of the process depending whether you are Purchasing or Selling, including lettings:

Primary documents_- proof of ID:

- valid Passport with MRZ;
- valid full UK photo driving licence;
- valid full UK Driving licence (non-photo, paper) issued before 1998;
- valid EU/EEA/Switzerland photo driving licence;
- valid EU/EEA/Switzerland national Identity Card;
- valid UK Armed Forces ID Card;

- valid UK Biometric Residence Permit (copy of both sides);
- valid Blue disabled drivers pass (with photo);
- valid Freedom Pass;
- valid Local Authority Bus pass;
- Department for Works & Pensions letter confirming pension details including National Insurance Number dated within the last 12 months.

Secondary documents - proof of residence (home):

- valid full UK photo driving licence;
- valid full UK Driving Licence (non-photo paper) issued before 1998;
- Local Authority council tax bill (dated within the last 12 months);
- UK Bank / Building societies statements/bills showing activity, dated within the last six months. Including account number and sort code (internet printed acceptable);
- UK mortgage statement (dated within the last 12 months - internet printed acceptable);
- utility bill dated within the last 6 months including - Electricity bill (with MPAN number), Landline, Gas, Satellite TV, Water (internet printed acceptable) - no mobile phone bills;
- Her Majesty's Revenue and Customs (HMRC) Inland Revenue (IR) Coding / assessment / statement (dated within the last 12 months) with National Insurance number;
- Department for Works & Pensions letter confirming pension details and NI Number. (Dated within the last 12 months).

We reserve the right to employ third party electronic verification for the purpose of verifying identity. This search will not affect your credit rating.

4. Lawful basis of processing

Spire Consultancy processes your information under the following:

- performance of a contract: where you enter into a contract with Spire Consultancy and we need to process your information as part of this contract
- legitimate interests: some information is processed by Spire Consultancy as part of its legitimate interests which include: protection against and identification of fraud, risk assessment, due diligence, network and information security, suppressions and managing opting out of communications, profiling, direct marketing, monitoring, web analytics, cloud storage, acquisitions, updating customer details, lettings, sales, financial services and other core products and service provided by the data controller;

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- public interest: some information is processed in accordance with public interest such as relocations;
- consent: where we process information under consent we will seek your clear and unambiguous consent prior to processing your data.

5. Information we share

We do not sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- formally contracted service providers to perform services on our behalf;
- Hosting Datacentres, Infrastructure, Applications (Development / Support), Cloud Services (Software as a Service – SaaS, Platform as a Service – PaaS, Infrastructure as a Service – IaaS).

We contractually require the following service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements:

- Councils, health and care providers;
- law firms;
- credit agencies, Land Registry Office, Her Majesty's Revenue and Customs HMRC), Financial Conduct Authority (FCA) and other relevant regulatory bodies;
- prospective employers requesting references via your written consent.

Additionally, we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities.

On websites, features can be accessed where we partner with other entities that are not affiliated with Spire Consultancy. These include social networking, geo-location tools etc. operated by third parties (indicated appropriately) who may use or share personal information in accordance with their own privacy policies. It is recommended that you review the third parties' privacy policies if you use the relevant features.

Spire Consultancy reserve the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets, with reasonable efforts for the acquirer to protect / use your information. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.

6. How long we keep information for

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep your information for as long as necessary. We generally keep personal information for 7 years after last contact with you. However, Spire Consultancy reserves the right to keep information for longer if we feel that this is in the legitimate interests of Spire Consultancy.

7. International data transfers

Spire Consultancy may transfer the personal information collected about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Privacy Notice or as otherwise disclosed to you at the time the data is collected (e.g. via program specific privacy notice).

8. Profiling

For the purposes of business conduct, enhancement, identification of fraud, money laundering and other potential unauthorised activities, Spire Consultancy engages profiling activities via direct use or anonymisation of sensitive personal information.

8.1 Direct profiling

Direct profiling is engaged for the fair and lawful purposes, to provide Spire Consultancy the ability to enforce Spire Consultancy "Terms and Conditions", legal reporting as may be required by applicable laws, regulations, policies / standards or requested by any judicial process or governmental agency having or claiming jurisdiction over Spire Consultancy or its affiliates; including, but not limited to:

- benchmarking employees: appraisals, performance, bonus payments, disciplinary actions, improvement plans, promotions and awards;
- background checks for existing and new employees, clients, business partners, affiliates;
- financial viability analysis / reports;
- business partner / client portfolio position, performance, risk positions;
- anti-money laundering;
- tax reporting;
- credit defaulting / exposure.

8.2 Indirect profiling

Indirect profiling, via anonymisation of personal information, is also used for preparing and furnishing aggregated data reports showing anonymised information, including, but not limited to, the following:

- compilations, analyses, analytical and predictive models and rules, and other aggregated reports for the

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purpose of advising our partners / affiliates and servicing institutions, retailers and other customers regarding past and potential future patterns of service usage, spending, fraud, and other insights that may be extracted from this data;

- compiling and communicating promotional and marketing information about products and services that Spire Consultancy, affiliates and other organisations we have affiliations with have and that may be of interest to you;
- conducting market research;
- facilitating our internal business operations, including the fulfilment of any legal requirements.

9. Your rights and choices

Your rights regarding the sensitive / personal information we maintain about you enable you to exercise choices about what personal information we collect from you. How we use that information and how we communicate with you are set out below.

9.1. Access and correction

You have the right to:

- obtain confirmation that we hold personal information about you;
- request access to, and receive information about, the personal information we maintain about you;
- receive copies of the personal information we maintain about you.

The right to access personal information may be limited in some circumstances by local law requirements.

To exercise these rights, please contact us at the address below.

9.2. Update and correct inaccuracies in your personal information

If you feel that the information we hold about you is incorrect or inaccurate, you can contact us outlining the information you feel is incorrect or inaccurate.

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to information we hold about you.

9.3. Objecting to the processing of your personal information

If you would like to object to any processing of your information by Spire Consultancy you can contact us outlining what processing of information you would like to object to.

9.4. Have the information blocked, anonymised or deleted.

If you would like Spire Consultancy to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like deleted, blocked or anonymised.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us as specified in the "How to contact us" section (para 10) below.

9.5. Opting out of processing

You can opt out collection of personal information by automated means e.g. when visiting our website or visit third-party websites and interact with our adverts, by using the Cookie Consent tool displayed in the website (the browser you use may provide options on how to opt out of receiving certain types of cookies). However, without cookies you may not be able to use all of the website features and/or online services.

Spire Consultancy's cookie policy can be found at: <http://www.spireconsultancy.co.uk/cookie-policy/>

Some of our service providers and partners may collect information about your online activities over time and across third-party websites to customise and target our adverts. You can at any time tell us not to send you marketing communications by:

- e-mail info@spireconsultancy.co.uk
- unsubscribing via the "unsubscribe link" within the generic marketing e-mails you receive from us, or
- contacting Spire Consultancy as indicated below.

9.6. Withdrawal of consent

If we obtain your information by consent you have the right to withdraw any consent you previously provided to us.

If we process your information under legitimate interest you can object at any time on legitimate grounds to the processing of your personal information.

Spire Consultancy will apply your preferences going forward. Doing so will mean that you cannot take advantage of certain Spire Consultancy and affiliate products, services and promotions.

The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.

You can exercise your right to prevent data processing by following the instructions on the pages where we collect your data or alternatively invoke the right to be forgotten by clicking the "Unsubscribe: stop all email communications" link listed on all our generic email communications.

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On receipt of this request we will remove your personal data from our central Customer Relationship Management system and all email marketing will cease with immediate effect.

10. How to contact us / complaints and feedback

If you:

- make a complaint about a breach of your personal information, applicable privacy laws / principles or a concern about Spire Consultancy privacy practices,
- would like access and/or update information or preferences you provided to us,

[please click here](#)

You also may e-mail us at:

info@spireconsultancy.com

Or write to us at:

**Data Protection Officer
Spire Consultancy Ltd
Haben Bridge Cottages
Petersfield
West Sussex
GU31 5HS**

If we fall short of your expectations in processing your personal information or you wish to make a complaint about our privacy practices, please contact us via the details in the "How to contact us" section above.

To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within two weeks of receipt.

If we cannot for lawful reasons complete your request we will explain this to you to the extent that we lawfully can.

11. How We Protect Personal Information

The security of your personal information is very important and Spire Consultancy is committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide, or we collect, against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for

keeping this password confidential. We ask you not to share your password with anyone.

Spire Consultancy stores personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information was collected, unless otherwise required or authorised by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

12. Updating this privacy statement

We will update this statement from time to time so we suggest that you review this statement at regular intervals. Where we undergo substantial changes to our privacy statement we will endeavour to inform you directly about these changes.

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