CHARLECOTE

Privacy Policy

August 2026

About this policy

This Privacy Policy explains how the Charlecote group of companies ("Charlecote Group", "we", "us", "our") collects, uses, shares and protects your personal information, and the rights you have in relation to it. We take our obligations under UK data protection law seriously, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

It also explains how to contact us, and how to complain if you are unhappy with how we have handled your personal data.

The companies covered by this policy

This policy covers the four companies below. Each is an independent legal entity and a **separate data controller**, and each is registered with the Information Commissioner's Office (ICO). Each company is the controller for the personal data it processes about you; where you deal with more than one Charlecote company, each is responsible for its own processing. This shared policy sets out the common approach we take across the group — the relevant controller is the company providing your service.

Company (company no.)	What it does	Regulation & memberships	ICO reg.
Charlecote Estates Limited (07446459)	Chartered surveying practice	Regulated by RICS, Member of The Property Ombudsman	ZA648014
Charlecote Residential Ltd (16540147)	Estate & lettings agency, trading as *Century 21 Fine Homes & Estates*	Member of The Property Ombudsman; HMRC-supervised for AML	ZB926571
Charlecote Residential Management Limited (16636139)	Leasehold block management	Member of The Property Ombudsman; HMRC supervised for AML	ZC012331
Charlecote Sussex Limited (17291801)	Commercial sales & lettings agency	HMRC-supervised for AML	ZC193475

Registered offices. Charlecote Residential Ltd, Charlecote Residential Management Limited and Charlecote Sussex Limited are registered at 32b Staple Gardens, Charlecote Mews, Winchester

SO23 8SR. Charlecote Estates Limited is registered at Redbourne, The Spinney, Southampton SO16 7FW.

Our Data Protection Officer

We have appointed a single Data Protection Officer (DPO) across the group:

Darryl Thomas
Email: d.thomas@charlecote.co.uk
Post: Data Protection Officer, Charlecote Group, 32b Staple Gardens, Charlecote Mews, Winchester SO23 8SR

Darryl is also our Money Laundering Reporting Officer (MLRO) for the businesses subject to AML obligations, and is the point of contact for any complaint about how we handle your personal data.

The personal data we collect and hold

The data we hold depends on your relationship with us and may include some or all of the following:

- **Identity and contact details** — name, title, gender where relevant, address(es), email and telephone numbers (business and/or private).
- **Identity verification and AML data** — copies of ID documents (such as passport or driving licence), proof of address, date of birth, and the results of electronic identity and anti-money-laundering checks (for Charlecote Residential, Charlecote Residential Management and Charlecote Sussex).
- **Transaction and service data** — information you give us in connection with a sale, purchase, letting, tenancy, survey, valuation or block-management service.
- **Financial information** — bank details, proof of funds and, for lettings, referencing, affordability and credit information.
- **Property information** — details of properties you own, occupy, or are buying, selling, letting or renting.
- **Correspondence** — records of our dealings and communications with you.
- **Website and device data** — information about your visits to our websites, including through cookies (see "Cookies and our websites").
- **CCTV images** — where CCTV is operated as part of a property-management or office-security function.
- **Recruitment and employment data** — where you apply to work with us or are employed by us.

Special category data. We do not generally seek to collect special category data (such as health information). Where we do — for example an accessibility requirement, or data incidentally captured on CCTV — we rely on an appropriate condition under Article 9 of the UK GDPR, usually your explicit consent or the establishment or defence of legal claims.

How we use your personal data, and our lawful basis

We only use your personal data where the law allows. The lawful bases we rely on are:

- **Performance of a contract** — to provide the services you have asked for and to manage our relationship with you.
- **Legal obligation** — to comply with laws that apply to us, including anti-money-laundering law (the Money Laundering Regulations 2017), tax and accounting requirements, and the rules of our regulators and redress schemes.
- **Legitimate interests** — to run, administer and promote our business, to prevent fraud, to keep our premises and systems secure (including CCTV), and to market our services to existing clients, provided your interests and rights do not override those interests.
- **Consent** — for certain marketing (for example email newsletters to people who are not existing clients) and for non-essential cookies. You can withdraw your consent at any time.

We use personal data to: deliver our surveying, agency, lettings and block-management services; verify identity and carry out AML checks; process payments; manage tenancies and properties; meet our regulatory, legal and accounting obligations; handle enquiries, complaints and claims; keep our people, premises and systems secure and prevent fraud; and, where appropriate, tell you about our products and services (and occasionally send a seasonal greeting) — unless you ask us not to.

Anti-money-laundering checks

Charlecote Residential Ltd, Charlecote Residential Management Limited and Charlecote Sussex Limited are required by law to carry out customer due diligence, including verifying your identity, before and during a business relationship. This is a legal obligation under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. These businesses are supervised for anti-money-laundering purposes by HM Revenue & Customs (HMRC). We are required to keep AML records for five years after the end of our business relationship with you. Our Money Laundering Reporting Officer is Darryl Thomas.

Who we share your personal data with

We do not sell your personal data. We share it only where necessary, for example with:

- other clients, agents and professionals (such as solicitors, conveyancers, mortgage brokers and surveyors) involved in your transaction;
- referencing, credit-reference and identity-verification agencies, for lettings and AML checks;
- landlords, tenants, freeholders, managing agents and contractors, as needed to deliver lettings and block-management services;

- our regulators and redress schemes — RICS for Charlecote Estates, and The Property Ombudsman for Charlecote Residential and Charlecote Residential Management;
- HM Revenue & Customs, the National Crime Agency and other authorities where we are required or permitted to do so by law (including AML reporting);
- our IT, software, hosting, communications and other service providers who process data on our behalf under written contracts; and
- our professional advisers, insurers and auditors.

Where a third party acts as our processor, they may only use your data on our instructions and must keep it secure.

Where your data is held, and international transfers

We primarily store and process your personal data in the United Kingdom — at our offices, in secure archive storage, and in trusted UK data centres used by our software and web-based services. CCTV images are held securely at the premises where CCTV operates. Where a service provider processes data outside the UK, we ensure appropriate safeguards are in place (such as UK adequacy regulations or the ICO's International Data Transfer Agreement).

How long we keep your personal data

We keep personal data only for as long as necessary for the purpose we collected it, to meet legal, regulatory, accounting and insurance requirements, and to deal with any queries, complaints or claims. Our main retention periods are:

Type of data	How long we keep it
AML / customer due diligence records	5 years after the end of the business relationship (Money Laundering Regulations 2017)
Client, transaction and financial records	Normally 6 years after the end of the relationship (contract, tax and limitation periods)
Tenancy and block-management records	For the duration of the tenancy or management arrangement, then normally 6 years
Complaints records	Normally up to 6 years after the complaint is resolved
CCTV footage	Normally around 30 days, unless needed for an incident or investigation
Marketing data	Until you withdraw consent or object
Recruitment records (unsuccessful applicants)	Normally up to 12 months
Website analytics	A limited period, as set out in our cookie information

When we no longer need your personal data, we securely delete or anonymise it.

Cookies and our websites

Our websites may use cookies and similar technologies to make them work and to help us understand how they are used. Non-essential cookies are only set with your consent. You can manage cookies through the banner on the relevant website and through your browser settings. Where a Charlecote company operates its own website, further detail is provided in the cookie information on that site.

Your rights

Under UK data protection law you have the right to:

- ask for access to the personal data we hold about you;
- ask us to correct inaccurate or incomplete data;
- ask us to erase your data in certain circumstances;
- ask us to restrict, or to object to, our processing — including for direct marketing;
- ask us to transfer certain data to you or another provider (data portability); and
- rights in relation to automated decision-making — we do not currently make decisions about you by automated means alone.

To exercise any of these rights, contact our DPO using the details above. We will respond within one month. If your request is complex, or you have made several requests, we may extend this by up to a further two months and will let you know. We may ask you to verify your identity, and in limited cases we may not be able to comply fully — for example where anti-money-laundering law requires us to keep records.

How to complain

If you are unhappy with how we have handled your personal data, please tell us first so we can put it right. Contact our Data Protection Officer, **Darryl Thomas**, at d.thomas@charlecote.co.uk, or by post to the address above. We will acknowledge your complaint, look into it, and give you a clear response in plain language — normally within one month.

If you are not satisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Helpline: 0303 123 1113 · Website: ico.org.uk/make-a-complaint

Complaining to the ICO will not affect any other legal rights you have.

Complaints about our service (not your data)

If your complaint is about our service rather than your personal data, please contact Darryl Thomas in the first instance. If we are unable to resolve it, you may be able to refer it to:

- **The Property Ombudsman** — for Charlecote Residential Ltd and Charlecote Residential Management Limited; or
- **RICS** — for Charlecote Estates Limited.

Changes to this policy

We keep this policy under review and will update it when our practices or the law change.

Version: August 2026