



At Home Cornwall Ltd is committed to protecting and respecting your privacy.

AT HOME CORNWALL LIMITED, a company registered in England and Wales under number 12746530 whose registered address is at 9 Tregarne Terrace, St Austell, Cornwall, PL25 4DD hereinafter referred to as ('At Home Cornwall' 'We', 'Us' or 'Our'), have created this privacy statement ('Statement') in order to reflect the transparency requirements expected of Us by law and Our own ethics. In this Statement, references to 'You', 'Your' and 'Customer' are references to Customers who uses the Site at <https://www.athomecornwall.co.uk/>.

Your privacy is extremely important, and we ensure we comply with the law and provide you with clear and transparent information about how we use you personal data. We only process it for the purposes outlined and we process as little of it as possible. Our aim is not to be intrusive and we undertake not to ask you irrelevant or unnecessary questions. We will try our best to keep Your personal data accurate and up to date (Please ensure you notify us of any changes). We also have robust measures and procedures in place to minimise the risk of unauthorised access and to keep it secure. Also, we only share it with third parties where we have a right to do so and where we are satisfied that the third party shall treat it with the same or higher levels of respect.

This policy outlines how we process any personal data that we collect from you or when you use our site or otherwise communicate with us including by email or telephone. We are committed to respecting Your privacy and protecting your personal data. For the purpose of the Data Protection Legislation, we are the Data Controller (ICO registration number: ZA778012). For all matters relating to privacy and data protection, please contact us at email to info@athomecornwall.co.uk or by telephone to 07970721301

We are regulated by The Property Ombudsman; We are a member of The Property Ombudsman

This Statement incorporates Our [Cookie Policy](#) and [Service Terms](#).

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of UK data protection law, the data controller is Mrs Hannah Brown

PERSONAL DATA YOU PROVIDE TO US VOLUNTARILY: In order for us to provide you with our services, we need to process some of your Personal Data. We understand that your data belongs to you and you provide it to us on trust that we will use it lawfully i.e. appropriately, proportionately, only in respect of the stated purpose and we will only hold on to it for as short a time as possible. Most important of all, We must have a valid *lawful basis* for processing your personal data. Rather than have lots of paragraphs of text where all these transparency requirements are scattered throughout this statement, We hope you find having most of it all in one eyeshot in our tables easier to navigate:

Personal Data ('PD')	Source	Purpose	Lawful Basis for general processing as set out in Article 6 GDPR	Retention
----------------------	--------	---------	--	-----------

<p>When You sell Your house through Us, we will collect Your:</p> <p>Name, Contact Details – Names, Address, Email Address, Property Details, Photo ID (<i>Driving Licence or Passport</i>) Proof of Address (<i>Utility Bill or Bank Statement</i>) Proof of Ownership (<i>Land Registry or Mortgage Statement</i>)- <u>See Anti-Money Laundering Policy on our website.</u></p>	<p>Customer (Seller)</p>	<p>We require Your Personal Data so that We can provide a service to You in selling Your house.</p> <p>We need proof of ID to eliminate fraud and comply with Anti-Money Laundering legislation – <u>See Anti-Money Laundering Policy on our website.</u></p>	<p>Contract and Legal Obligation</p>	<p>6 years from the end of the relevant tax year to comply with HRMC and guidelines from the Property Ombudsman.</p>
<p>When You wish to buy a house through us, we will collect Your:</p> <p>Name, Contact Details, Proof of Funds (mortgage lender statement, bank statement), Photo ID (<i>Driving Licence or Passport</i>) – <u>See Anti-Money Laundering Policy on our Website.</u></p>	<p>Customer (Buyer)</p>	<p>We require Your Personal Data so that We can help you find a home to buy with Us.</p> <p>We need proof of funds to show that you are able to make an offer on the property.</p> <p>We need proof of ID to eliminate fraud and comply with Anti-Money Laundering legislation - <u>See Anti-Money Laundering Policy on our website.</u></p>	<p>Contract and Legal Obligation</p>	<p>6 years from the end of the relevant tax year to comply with HRMC and guidelines from the Property Ombudsman.</p>
<p>When You make an enquiry, we will collect Your:</p> <p>Your name, email, telephone number, address and query details.</p>	<p>Customers & Prospective Customers (Buyer and Seller)</p> <p>This may have come through Our social media channels, a platform such as Rightmove, Zoopla, Primelocation or via the contact form on the website.</p>	<p>To respond to requests for feedback, information and support from prospective or existing customers.</p>	<p>Legitimate Interests</p>	<p>We will keep your personal data for as long as it takes to answer your enquiry and then for a further 6 months.</p>



Technical Data (as defined)	Customers (Sellers and Buyers) and Enquirers.	To monitor the effectiveness of the website and non-marketing communications.	Legitimate Interests	See Our Cookie Notice for information regarding retention periods.
Financial/ Accounting Transactions	Customers (Seller)	To record transactions made in the business	Contract and Legal Obligation	6 years from the end of the relevant tax year to comply with HRMC and guidelines from the Property Ombudsman.

- 1.1 We are a growing business and we want to be of value to you during our relationship so if we ever require further information from you or if we would like to use your personal data for a different purpose, then we will always provide you with additional information about this at the point that you are invited to make use of these additional services.
- 1.2 OUR RETENTION RIGHTS: How long we keep your personal data depends on the context in which you provide it and the purpose for which we use it. See the last column in the table above. Do note that we need to retain sufficient information about you in compliance with certain legal or statutory requirements, for example, in the event of a legal or insurance claim in the future so that We can identify You.
- 1.3 TECHNICAL DATA We MAY PROCESS WHEN You USE OUR SERVICES: This typically relates to Technical Data involving the use of cookies and other technologies. This data is typically processed via the use of first party cookies, or third-party cookies (e.g. where we use third party services by way of plugins or other software licensed to us by a third party e.g. analytics related to the use of our own site or cookies set by operators of a third party service such as social media and file sharing networks e.g. Twitter and Facebook). The types of data obtained about You may include Your e.g. visits to the Site; page views, downloads, navigation and exit; IP address; geographical location; browser type and version; operating system; referral source; length of Your visit ('Technical Data'). This enables Your online activity to be tracked and for advertisements to be targeted to You (subject to Your cookie consent management preference settings). To learn more, please see Our [Cookie Policy](#).

2. HOW DO WE USE YOUR PERSONAL DATA TO COMMUNICATE WITH YOU?

- 2.1 NON-MARKETING COMMUNICATIONS: You acknowledge that, Your personal data may be used by us (or a Service Provider on our behalf) to contact You when necessary in connection with Your use of the Site and to access Our Services as follows:

Non-Marketing Communication?	Method of receipt	Lawful Basis for general processing
Invoices Forms for completion Information regarding EPC, structural works and other issues relating to Your home as required. Communications regarding the sales Process to keep you up to date.	Email	Contract as set out in Article 6 GDPR

- 2.2 MARKETING COMMUNICATIONS: At present We are not doing any Direct Marketing. Instead, we are concentrating on our social media channels, Rightmove, Zoopla and Primelocation. However, if that changes,



we will update this Privacy Statement to accurately reflect any changes. From time to time we send out marketing emails from our Squarespace Website platform – Marketing - We may use your personal data to provide you with information about our services and/or products, which we consider may be of interest to you. you can update your preferences of how and what we communicate to you at any time through the preference centre within our website

- 2.3** PROFILING: We may from time to time use publicly available demographic information to determine who We target for specific events or marketing campaigns so as to avoid contacting individuals unnecessarily. You have the right not to be subject to a decision based solely on automatic processing ([Article 22](#)). We undertake profiling when you have visited our Site or Facebook Page. Where this is a result of cookie activity, you can manage this via your cookie preferences via our cookie preference management tool.
- 2.4** RESEARCH & STATISTICS: We may use communications information to compile anonymous statistical reports showing information like the number and type of query and how each has been resolved. Occasionally we will use information provided to develop case studies for learning and development purposes. We will be very careful to ensure that any information that could re-identify a person is removed or changed to preserve anonymity.
- 2.5** OTHER WEBSITES OR APPLICATIONS & THEIR POLICIES: The Site may contain links to other websites or applications. We are not responsible for the privacy practices or policies or for the content of such websites or applications of such third parties, so You should be careful to read and understand those policies independently.
- 2.6** SOCIAL MEDIA:

► Social media plugins: On our site, we have included social media plugins that You can use to share certain content over social networks. To protect your privacy, we offer you these social plugins as so-called “2-click buttons.” The “2-click solution” prevents data (e.g. Your IP address) from being transmitted to social networks such as Facebook or Twitter as soon as you open our site. For this purpose, the buttons are deactivated by default and are only activated by clicking the social plugins for the first time. After activation, the plugins also collect Personal Data such as Your IP address and send it to the servers of the respective provider where it is stored. In addition, activated social plugins set a cookie with a unique identifier when loading the relevant Website. This also allows providers to create profiles of your usage behaviour. The data will be used to show you personalised advertising, as well as for market and opinion research purposes. Personal Data transfer is independent of whether you have an account with the plugin provider and are logged in there. If you are logged in with the plugin provider, your data collected with Us will be assigned to Your existing account with the plugin provider. We have no exact information about the concrete use of the data nor about the storage period. Please read the privacy policy of the respective providers. We have integrated the plugins of the following providers on Our Site:

- Facebook (Facebook Inc., USA, Data protection declaration: <http://www.facebook.com/policy.php>)
- Twitter (Twitter Inc., USA; Data protection declaration: <http://twitter.com/privacy/>)
- Instagram (Instagram Inc., USA Data protection declaration; <https://help.instagram.com/402411646841720>)
- LinkedIn (LinkedIn Ireland Unlimited Company; <https://www.linkedin.com/legal/privacy-policy>)

3. WHO HAS ACCESS TO YOUR DATA & WHERE IS IT STORED?

3.1 THIRD PARTIES:

We may engage or collaborate with a Third Party for a variety of different reasons. This may be in relation to the performance of our business and daily operational functions on our behalf to enable us to fulfil our services only (including making improvements to Our Services). Where it is necessary to share your Personal Data, we will limit the data that we share to the minimum required to provide the service and the data processor (or Data Controller) will only be able to use it for the specific purposes for which it was shared. If We stop using the service of a Data Processor, we ensure Your Personal Data is deleted or securely returned to us.

What type of PD is shared with Third Parties by Us?	What is Our role? DC or DP	What is the Third Party's specific name? OR category of Third Parties?	Third Party Role: JDC or IDC or DP	What is the Purpose of sharing the PD?	What Lawful Basis do We rely on to transfer the PD?	Where is the PD transferred to? What safeguards are in place?
All PD related to the purpose	DC	Accountant	DC (DP for payroll)	accounting	Legal/ Statutory obligation	Our Accountants are based in the UK
All PD related to the purpose	DC	Legal Advisors & Legal Authorities/ Enforcement bodies	DC	to enforce the terms under which You transact or communicate with Us/ to assist law enforcement	Legal/ Statutory obligation & Contract	The Solicitors are based in the UK
All PD related to the purpose	DC	Google LLC https://drive.google.com/drive/L	DP	To store documents in Google Drive	Contract	This third party is relying on Standard Contractual Clauses while We await further guidelines when We may transition to an alternative transfer mechanism Google Privacy Statement
All PD related to the purpose	DC	Microsoft Inc https://www.microsoft.com/en-gb/	DP	To use Outlook email/ store documents on OneDrive	Contract	
All PD related to the purpose	DC	Sage	DC	To manage the business accounts	Contract	Please see Sage's Privacy Notice for more information.
All PD related to the purpose	DC	YOTI Sign	DP	To sign contracts, terms and documents	Contract	Please see Yoti's Privacy Notice for more information
All PD related to the purpose	DC	Photographer	DP	To take photos of houses for our Customers		
All PD related to the purpose	DC	Rightmove House Sale Website	DP	To share the images, floorplan, 360 tour, and information regarding your property	Contract	Please see Rightmove's Privacy Notice for more information
All PD related to the purpose	DC	Zoopla House Sale Website	DP	To share the images, floorplan, 360 tour, and information regarding your property	Contract	Please see Zoopla's Privacy Notice for more information
All PD related to the purpose	DC	Prime Location House Sale Website	DP	To share the images, floorplan, 360 tour, and information regarding your property	Contract	Please see Prime Location's Privacy Notice for more information
All PD related to the purpose	DC	FaceBook/ Instagram – META	JDC	So that the Data Subject can be a part of the Facebook Page community. More information can be	Consent Where You share Your own Special	This third party is relying on Standard Contractual Clauses while We await further guidelines when We may transition to an



				found on Facebook here .	Category Data rely on the additional condition that the PD <u>is manifestly made public</u> (We are defining 'public' as in the <u>Facebook Audience and this is in accordance with Facebook's Ts & Cs</u> (Article <u>9(2)(e)</u> GDPR).	alternative transfer mechanism. Meta Privacy Policy - https://www.facebook.com/privacy/policy/
--	--	--	--	--	---	---

The last column relates to where the PD goes and what safeguards are in place in the recipient territory where it is transferred/ stored. It will be one or more of the following:

WHERE?	INFO AROUND SAFEGAURDS
United Kingdom	We may store some or all of the Personal Data in the United Kingdom only. Should We need to transfer Your Personal Data outside of the UK or EEA in the future, it will be in compliance with the GDPR requirements for external transfer and all details will be added to Our Statement.
Within the EEA	We may store some or all of the Personal Data in the EEA. Should We need to transfer Your Personal Data outside of the EEA in the future, it will be in compliance with the GDPR requirements for external transfer and all details will be added to Our Statement.
Outside EEA	We may store some or all of the Personal Data in a country outside of the UK and EEA. We will not transfer Your Personal Data to any Third Parties based in other countries outside the EEA unless there is a <u>European Commission adequacy decision</u> , or the EU Commission approved <u>Standard Contractual Clauses</u> are in place.

If You would like more information about any of the transfer safeguards, we implement please contact us using the details as set out at Clause 5 of this Statement.

3.2 Transfer of Personal Data in the Event of the Sale of At Home Cornwall Limited or its Assets

In the event that At Home Cornwall Limited is sold or transfers some of its assets to another party, Your Personal Data could be one of the transferred assets. If Your Personal Data is transferred, its use will remain subject to this Statement. Your Personal Data will be passed on to a successor in the event of a liquidation or administration.

4. WHAT ARE YOUR RIGHTS UNDER DATA PROTECTION LEGISLATION?

4.1 You have a number of rights that You can exercise free of charge and on request in certain circumstances, however, if Your requests are obviously unfounded or excessive, We reserve the right to charge a reasonable fee or to refuse to act. You have the right:

- to be informed about the collection and use of Your PD. This is what this Statement fulfils;
- to access Your PD and supplementary information ('DSAR');
- to have inaccurate PD corrected, or completed (if it is incomplete);
- to have Your PD erased;



- to restrict Our processing of Your PD;
- to receive a copy of any PD You have provided to Us, in a machine-readable format, or have this information ported to a third party.
- to object AT ANY TIME to processing of Your PD for direct marketing purposes;
- to object in certain other situations to the continued processing of Your PD.

For more information on these rights and when You can exercise them, see the [Information Commissioner's Guide](#)

4.2 If You wish to exercise any of these rights, please complete Our [Data Subject Rights Request Form](#). We will respond to You within one month from when We receive Your request, unless the complexity and number of requests We receive means that We need more time. If We do need more time (up to two further months), We will tell You why within the first month.

5. HOW CAN YOU SUBMIT A QUERY OR A COMPLAINT?

QUERY: We are happy to provide any additional information or explanation needed in respect of our processing activities upon request. For all matters relating to privacy and data protection, please contact us on info@athomecornwall.co.uk

COMPLAINT: We try to meet the highest standards when processing Your PD. For this reason, we take any complaints We receive about this very seriously and We encourage You to bring it to Our attention. While We hope to be able to resolve any concerns You have about the way that We are processing Your PD, You have the right to lodge a complaint with the Information Commissioner's Office (ICO) (or with the supervisory authority of the European Member State where You work, normally live or where the alleged infringement of data protection laws occurred) if You believe that Your PD has been processed in a way that does not comply with the Data Protection Legislation or have any wider concerns about Our compliance. You can do so by calling the ICO helpline on 0303 123 1113 or via their Website <https://ico.org.uk/>

6. DO WE USE COOKIES?

For information about cookies and how they are used on the Site, please visit Our Cookie Consent Preference Management Centre accompanied by Our [Cookie Policy](#).

7. CHANGES TO THIS STATEMENT

We keep Our Statement under regular review. This Statement was last updated on 24th Jan 2023.

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.

8. DEFINITIONS & INTERPRETATIONS

Data Controller *or* DC *or* JDC *or* IDC: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of PD ([Article 4\(7\)](#));

Data Processor *or* DP: means a natural or legal person, public authority, agency or other body which processes PD on behalf of the Data Controller ([Article 4\(8\)](#));

Data Protection Legislation: means, as applicable to either Party:

- (a) the [General Data Protection Regulation 27 April 2016](#);
- (b) the [Data Protection Act 2018](#);
- (c) the [Privacy and Electronic Communications \(EC Directive\) Regulations 2003](#);



- (d) any other applicable law relating to the processing, privacy and/or use of PD, as applicable;
- (e) any laws which implement any such laws; and,
- (f) any laws that replace, extend, re-enact, consolidate or amend any of the foregoing.

Data Subject Access Request or 'DSAR': refers to right of access as further described in Clause 4.

EEA: refers to the European Economic Area which consists of all EU member states, plus Norway, Iceland, Liechtenstein.

Electronic Mail: includes but is not limited to email, text, video, voicemail, picture and answerphone messages (including push notifications).

General Data Protection Regulation or GDPR: The General Data Protection Regulation ((EU) 2016/679). PD is subject to the legal safeguards specified in the Data Protection Legislation including the GDPR.

Non-Marketing Communication(s): refers to any communication which is functional/ administrative only as distinct from Marketing Communications.

Personal Data or PD has the meaning set out in the Data Protection Legislation and shall include Special Category Data (as applicable).

Service Provider(s): refers to a Third Party with whom We work with from time to time as a necessary part of providing Our Services and with whom We may need to share Your PD.

Services: refers to Our Services We may provide to You.

Special Category Data: has the meaning set out in the Data Protection Legislation.

Technical Data: refers to that at Clause 1.5 which is capable of being considered PD.

Third Party: refers to a Data Processor or Data Controller with whom We may need to share Your PD. This includes Service Providers as applicable.

Contains public sector information from <https://ico.org.uk> licensed under the [Open Government Licence v3.0](https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/) [[<http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>]].