

# Fox & Sons Auctions Privacy Notice

## 1. Who we are

- This Privacy Notice applies to the use and processing of personal information collected by Bagshaw Auctions, Barnard Marcus Auctions, Fox & Sons Auctions, Sequence Auctions, William H Brown Auctions as well as other Sequence brands such as Allen & Harris, Bagshaws Residential, Barnfields, Barnard Marcus, Brown & Merry, Fox & Sons, Jones & Chapman, Manners & Harrison, Roger Platt, Sequence, Shipways, Sweetenhams, William H Brown, which form apart of Sequence (UK) Limited. The ICO Registration number of Sequence (UK) Limited is Z8920800
- The phrases “us”, “we” or “our” will mean those businesses which are part of Sequence (UK) Limited on behalf of and in respect of whom this Privacy Notice is made.
- For information concerning the collection, use and processing of personal information by any of our third-party business partners or suppliers, please contact our representative with whom you usually deal.

## 2. Information covered by this Privacy Notice

- **Personal data.** This is information, or any combination of separate pieces of information, that could be used to identify you
- **Special categories of personal data.** This is information which is classified as sensitive (for example details of your health)

Please read this Privacy Notice carefully. If you have any questions about this notice or our use of your personal data, please contact the Connells Group Data Protection Officer by email to [DPO@connellsgroup.co.uk](mailto:DPO@connellsgroup.co.uk) or in writing to Cumbria House, 16-20 Hockliffe Street, Leighton Buzzard, Bedfordshire, LU7 1GN.

Sequence (UK) Limited is part of the Connells Group, and all data protection matters are managed at Group level. Information concerning the make-up of the Connells Group can be found by visiting <http://www.connellsgroup.co.uk/our-group>

## 3. Where we get personal information from

When you enquire or register for products and services provided by Sequence (UK) Limited we may collect personal information from a variety of sources.

The majority of the personal information which we collect will have been provided by you during the course of your relationship with us either through face to face contact, by telephone, email or electronic communications such as messaging or through the internet.

However we may also obtain your personal data from other sources including:

- information we collect when you visit or create an account on our websites
- other Connells Group companies
- companies which support advertising services that promote our services including online property portals (such as Rightmove and Zoopla), social media sites (such as Facebook and Twitter) and online advertising platforms (such as Google Adwords)
- information provided to us by other third parties
- other publically available sources such as the electoral roll and HM Land Registry

#### **4. What information we collect**

##### **4.1 Information we collect directly from you**

Depending on the type of service or product we are discussing, the following are examples of information we may collect directly from you:

##### **Information we may collect directly from you**

##### **Why we collect it**

Your name, postal address, phone number, email address and details of your requirements

To provide you with auction services to purchase or sell a property

Your marital status, date of birth, nationality and tax status

When you enter into a auction sale or purchase agreement

Your date of birth, nationality and details from identity documents you provide

To perform 'know your client', anti-money laundering checks, as required by law

Proof that you have sufficient funds to support any offer that you may wish to make to buy a property

To ensure you are able to pay the required amount of deposit

Financial information, for example, a copy of your bank statement or an agreement in principle from your mortgage provider

To provide evidence of the source of funds you will be using to buy a property

Your bank account details

Where we take payment for the services we provide to you and for payment of the deposit

Details of your mortgage arrangements, confirmation of how long you have owned the property and details of the source of monies invested in the property when you register to sell

To undertake know your client and anti money laundering checks

Details of any mortgage or insurance, licensing documentation and service contracts which you have in place in relation to a property you wish to let

Where you are a landlord and we are providing you with letting services

Your marital status, employment details, national insurance number, nationality, residential status, bank details and credit history

To carry out referencing and credit checks and the results of those checks

Details relating to your property including photographs, floor plans, energy performance certificate ratings/ home reports, property description and survey results

To deliver our service to you when you engage us to market a property for you

Your communication and marketing preferences

To ensure we only send you details of products and services you are interested in through your preferred communication channel

Any telephone calls either to or from our customer service teams may be recorded for training, monitoring, compliance and security.

#### **4.2 Information we collect when you visit or create an account on our websites**

We use cookies and other technologies to collect information when you visit our web sites, including when you make use of our on line chat.

We may collect personal information in connection with your use of our website, such as:

- your name, email address, telephone number and property address when you register for an account or use an online form to arrange a viewing, register for property alerts, request a valuation
- data sent from your browser to our server which may include:
  - the time, date and duration of your visit
  - the site from which you have come (the referral URL)
  - the pages you have visited and
  - your IP address

Details of how we use cookies are provided in Section 13 'Our Use of Cookies' and in our Cookies Policy

#### **4.3 Information we obtain from other Connells Group companies**

For activities related to providing advice on regulated mortgages and non-investment insurance contracts, Sequence (UK) Limited are an appointed representative of Connells Limited, and may share your information within the Group.

Connells Ltd is authorised and regulated by the Financial Conduct Authority; the Financial Services Register number is 302221.

#### **4.4 Information we obtain from on line portals**

Where you contact by providing your details through on line portals such as Rightmove or Zoopla, we will use the details to contact you to provide the services you have requested.

#### **4.5 Information we obtain from third parties**

Where we are required by law, or for business needs, we will obtain information about you from third parties, but only after we have your agreement to do so. For example (but not limited to) the third parties we may need to contact are credit reference agencies, banks, employers, accountants and solicitors in order to obtain

references, undertake identity verification and basic criminal record checks, and validate your income level and financial history.

#### **4.6 Circumstances under which criminal disclosures will be collected**

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences. This is relevant to insurance related activities such as underwriting, claims and fraud management.

When we process any Criminal Disclosures we do so on the basis that it is in the substantial public interest to be able to provide vital insurance products as permitted by UK data protection related laws and regulations from time to time. Information on Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as us and insurance providers, to enable customers to secure the important insurance protection that they require.

### **5. How we use your information**

We will process the information you provide or we obtain from other sources to provide you with products and services and answer any questions you may have.

The following are examples of how we use the information we collect:

- To process your registration and confirm your identity
- To provide you with the auction services which you have asked us to provide, including but not limited to:
  - helping you to sell your property
  - valuing your property
  - arranging and carrying out accompanied viewings
  - finding a property to purchase
- To arrange survey and valuations
- To provide property auction services
- To create and manage your on line account
- To process payment for our services
- To protect against and prevent fraud, unauthorised transactions, money laundering, tax evasion, claims, other liabilities and manage risk exposure and agent or franchise quality, integrity, compliance and security of business processes
- To provide, administer and communicate with you about Connells Group products, services, offers, programs and promotions, their issuers, acquirers, retailers and partners

- To arrange an energy performance certificate or home report inspection for you
- To ensure that utilities are in place and that utility companies and local authorities are able to contact you for billing purposes when you move in to a property
- To compile business directories, including business contact information and maintain up to date client records
- To operate, monitor, evaluate and improve our products, services and websites
- To evaluate your interest in and suitability for employment

### **5.1 Customer Surveys**

From time to time we may provide your information to our customer service agencies for research, survey and analysis purposes so that we can monitor and improve the services we provide. We or our agents and sub-contractors may occasionally contact you including by post, email or telephone to ask you for your feedback and comments on our services.

### **5.2 Information about our products and services**

We may also use your personal data to contact you by post, e mail, telephone or other electronic means to provide you with information about products and services from the Connells Group and carefully selected third parties which we feel may be of interest or relevant to your needs.

Please see Section 12 for information about how you can exercise your rights.

### **5.3 Credit scoring**

Some of the services provided by third parties may involve an automated decision and/or credit scoring to determine whether we are able to provide a service or product.

Using third parties to undertake searches and collate information on our behalf helps make fair and responsible decisions. When coming to these decisions we and third parties will consider:

- the information provided on the application form
- information about previous account conduct , including any payment arrears and
- official public records information such as fraud record information and insolvency records

Any credit scoring methods used by third parties are regularly tested to ensure they remain fair, effective and unbiased.

For further information about automated decisions or credit scoring, please contact the Connells Group Data Protection Officer by e mail at [DPO@connellsgroup.co.uk](mailto:DPO@connellsgroup.co.uk)

## **6. Who we share your information with**

We may share your information both within the Connells Group of companies and also relevant third party business partners, both for the purposes set out in this Privacy Notice, or for other purposes approved by you.

### **6.1 Connells Group**

We may share information within the Connells Group of companies for the following purposes:

where services are provided by one Connells Group Company to another pursuant to an intra-company

for the purpose of administering our business

to provide you with information about products and services

for any other purpose agreed by you

### **6.2 Third Party service providers**

Where we engage third party service providers to provide products (such as mortgages, house and contents and family protection insurances and utility services) or other business services and operations, we provide them with only the personal information they need to perform the service or provide the product we request. We contractually require them to securely protect the information, and not to use it for any other purpose.

Indicatively - but not limited to - we may disclose your information to the third parties listed below for the purposes listed:

Third party	Why we share your personal information
Approved contractors	To install for sale or to let boards, to appoint managing agents and building maintenance contractors, to arrange EPC visits, to arrange for contractors to provide safety & statutory tests and to take inventories
Surveyors	To undertake a structural or Homebuyers survey
Firms on our conveyancing panel	To provide home conveyancing services
Our panels of mortgage lenders	To progress your enquiry or application for a residential or buy to let mortgage application
Ageas Insurance Limited	To progress your enquiry or application for buildings and contents insurance
Aviva	To progress your enquiry or application for a term insurance, critical illness cover and income protection
Rent and Legal insurance providers	To set up landlord insurances, and in the event of a claim
Solicitors	To pursue a claim for breach of tenancy p
Audioagent Ltd	To produce marketing packs for the sale of your home
Referencing Companies	<p>To check your creditworthiness, obtain tenant references and to help prevent fraud and money laundering</p> <p>TransUnion: To check credit worthiness and obtain references for tenants. For fraud prevention, anti-money laundering checks and identity verification. . Details regarding TransUnion can be found at <a href="https://www.transunion.co.uk/legal-information/bureau-privacy-notice">https://www.transunion.co.uk/legal-information/bureau-privacy-notice</a>).</p> <p>Credas: For fraud prevention, anti-money laundering checks and identity verification</p>
The Local Council	Payment/collection of Council Tax
Law enforcement bodies including the police, HMRC and local authorities	To comply with court orders or legal obligations
Landlord, tenant or Guarantor	To comply with our legal obligations where we are providing a lettings service

Spark Energy Supply Limited	Where a landlord of property has asked us to arrange the property's gas and/or electricity supply to be provided by Spark Energy
The parties whose property you have viewed or on whose property you have submitted an offer	For the purposes of ascertaining in a potential fee payable for introduced parties (title, first initial, surname) or for other reasons relating to your viewing or offer on a property;
Utility Companies	For payment of utility bills
Debt collection companies	To assist us in recovering any monies which are owed and overdue
Deposit Protection Scheme providers	To provide a Tenancy Deposit Protection Scheme
ARLA Propertymark, a professional body responsible for raising professional standards amongst letting agents	If information relating to you is requested by them in order to protect your interests
The Property Ombudsman	Where they are providing a dispute resolution service in connection with letting services

We also provided a link from our website to Google Maps, to show the location of a branch or a property, and to allow you to input your postcode to get directions. If you use or access Google Maps you are bound by the Google Maps/Google Earth Additional Terms of Service

[https://maps.google.com/help/terms\\_maps.html](https://maps.google.com/help/terms_maps.html) including the Google Privacy Policy

<https://www.google.com/intl/ALL/policies/privacy/index.html>

## 7. Lawful basis of processing

Sequence (UK) Limited processes your information under any of the following lawful conditions:

- **Performance of a contract** - this is where the collection and processing of your data is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract
- **Legal obligation** - this is where the collection and processing of your data is necessary for compliance with a legal obligation, for example verification of identity and fraud prevention

- **Consent** - where we process information under consent we will seek your clear and unambiguous consent before processing your data, for example to send and/or receive marketing information from other Connells Group companies
- **Legitimate interests** - some information is processed by Sequence (UK) Limited as part of its legitimate interests which include network and information security, direct marketing, web analytics, updating customer details, lettings, sales, and other core services provided

## 8. Other situations

We may transfer or otherwise process your personal information:

- As part of the sale of a Connells Group business to another company, or in relation to the purchase of another business
- When we have received your instruction to pass the sale of your property to another agent
- To enforce our terms and conditions
- When required by law and/or government authorities
- When requested by the Property Ombudsman Service or any other consumer ombudsman or trade association
- Where, following a member of our staff displaying Covid-19 symptoms, we, including via the staff member, are obliged to provide names and contact details to the NHS Test and Trace Contact Tracing Team of any people that a member of our staff was in close contact within the 48 hours before Covid-19 symptoms started.

## 9. How long we keep your information for

We will keep your information for as long as is reasonably necessary for the purposes set out in this privacy notice, and to fulfil our legal and regulatory obligations.

For further information about how long we will keep your information, please contact the Connells Group Data Protection Officer by email at

[DPO@connellsgroup.co.uk](mailto:DPO@connellsgroup.co.uk)

## 10. When we communicate with you

## **10.1 Service related**

We will send you service related communications and respond to any questions which you may ask.

## **10.2 Marketing our services to you**

Where you contact us through our website, or make an enquiry in branch or on the phone, or via Rightmove or Zoopla we will use the details you have supplied to us to provide you with our general property marketing list by email.

If you choose to 'opt-out' then we will not email you any further information relating to our general property marketing list.

We may also contact you in order to provide you with information about our core products and services which we believe may be of interest to you, in accordance with your preferences including:

- general updates in relation to the property market
- information on mortgages, protection and insurance products and conveyancing services

We may also carry out targeted advertising to you on social media websites such as Facebook where you have already shown an interest in our services. This is done through analysing information we collect about your interactions on our websites and making this available to social media networks.

## **11. How we communicate with you**

For service related communications, we will contact you either by e mail or through the post. We may also telephone you or send you SMS messages, which may include automated SMS reminders for viewings.

We give you choices about how we communicate promotions and offers to you.

### **11.1 By e mail**

You can stop receiving promotional email messages from Sequence Auctions by contacting us at [auctions.hammersmith@barnardmarcus.co.uk](mailto:auctions.hammersmith@barnardmarcus.co.uk). You can manage your other preferences in respect of Sequence (UK) Ltd at [-https://managepreferences.co.uk/sequence](https://managepreferences.co.uk/sequence)

### **11.2 By post**

You can stop receiving promotional postal mail from Sequence (UK) Limited or by changing your preferences in the Marketing Preference Centre

<https://managepreferences.co.uk/sequence>

### **11.3 Mobile Text Messages**

You can stop receiving promotional text messages from Sequence (UK) Limited by following the opt-out instructions provided in the text message or by changing your preferences in the Marketing Preference Centre

<https://managepreferences.co.uk/sequence>

### **11.4 Telephone**

You can opt out of receiving promotional telephone calls from Sequence (UK) Limited by informing our telephone agents or by changing your preferences in the Marketing Preference Centre <https://managepreferences.co.uk/sequence>

## **12. Your statutory rights**

You have a number of rights concerning the personal information we use. These include the right to:

- ask us *for access to a copy* of your personal information we hold about you
- ask us *to correct* your personal information
- ask us *to delete* your personal information

You can delete your online account at any time. This will delete any personal information in your account that we have about you, and it will mean any data about how you've used the online account will be made anonymous.

However, deleting your online account will not delete any data you've shared with us for reasons that are not connected with your online account. If you wish us to delete your data which is unconnected with your online account, please contact us as described below

- *withdraw your consent* to use your personal information

Where you have provided consent for our processing of your personal data, you may withdraw that consent at any time. If you withdraw your consent, your previous consent will remain valid in respect of our use of your data in relation to good or service we are still contracted to provide

If you would prefer not to receive information from Sequence (UK) Limited or carefully selected third parties you can opt out by contacting your local Estate Agency Branch, or by emailing <https://managepreferences.co.uk/sequence>

We will act to respond to your request to stop receiving promotional email, phone, text or postal messages from Connells Group as quickly as is practicable (around 10 working days, as systems take time to replicate). We will keep information for record keeping purposes, to ensure we fulfil your request not to send particular types of messages.

- ask us to *restrict the use* of your personal data, including direct marketing
- *object to* our use of your personal data
- *object to an automated decision*, including profiling (for example, in terms of credit risk)
- *lodge a complaint* with the Information Commissioner's Office, if you object to the way we use your personal information. For more information please go to [ico.org.uk](https://ico.org.uk)

If you wish to make a request for access to a copy of your personal data, please write to the Connells Group at Group Legal Services, Bridgegate House, 5 Bridge Place, Lower Bridge Street, Chester CH1 1SA or email [DSAR@connells.co.uk](mailto:DSAR@connells.co.uk)

If you wish to exercise any of your other rights, please write to the Connells Group Data Protection Officer at Connells Group, Cumbria House, 16-20 Hockliffe Street, Leighton Buzzard, Bedfordshire, LU7 1GN or e mail [DPO@connellsgroup.co.uk](mailto:DPO@connellsgroup.co.uk) We will acknowledge your request and let you know what we will need from you to carry out your request. Every effort will be made to respond to or comply with your request as quickly as possible, and we will ensure our systems are updated as soon as is practicable in response to your request.

### **13. Our use of cookies**

A cookie is a small file placed on your device when you visit a website that can be understood by the site that issued the cookie. We use the information collected by cookies to remember who you are to log you in and to store your preferences when using a particular site. It may contain a unique identifier to ensure that you are not shown the same information and/or are only shown information you have stated that you are interested in.

Our security software may use your IP address and browser version to help protect our systems and provide diagnostic information in the case of an issue.

Further information about our use of cookies is provided in our Cookies Policy

### **14. How we protect your information**

We store your personal information on our computer systems and in our paper records.

We have implemented strict security procedures to ensure that personal information is not damaged, destroyed or misused, and to prevent unauthorised access to your information.

The information that we collect is stored in a secure facility with restricted physical access.

We also use a number of security measures to prevent electronic access.

Where - in line with this Privacy Notice - information is shared with third parties, similar security measures are used to protect your information.

## **15. Data Transfers**

If we need to transfer data outside the European Economic Area (EEA) and the country it's transferred to is not on an approved list for having adequate security controls in place, we will limit when we do this and the amount of personal data we send. We will also ensure that there is adequate protection in place before sending anything to other countries outside the EEA by imposing contractual obligations on the recipients to ensure the security and confidentiality of your data.

## **16. Children's privacy**

We do not offer any products or services to children. In certain circumstances (for example a mortgage application) we may need to collect the name and date of birth of children from mortgage applicants, and share this with the selected mortgage provider.

## **17. Links to other websites**

Our websites, other electronic portals and documentation may provide links to other websites for your convenience and information. These may operate independently from us and have their own privacy notices or policies, which we strongly suggest you review.

Where linked websites are not owned or controlled by us, we are not responsible for their content or data privacy practices.

## **18. Our Promise to you**

When you provide us with this information, you agree to the collection, use and sharing of your information in accordance with this data privacy notice. Our promise to you is that

- We'll work with other businesses to put together offers we think you might like
- You are in control of your data
- You can change your privacy settings at any time

- If you don't think the data is correct tell us and we'll put it right
- We will keep your data secure
- We also promise to collect, process store and share your data safely and securely and to make sure the businesses we work with do the same

## **19. Updates to our Privacy Notice**

We will occasionally update our Privacy Notice, so we suggest that you review this Notice from time to time.

**(last updated on 16/03/2019)**

## **Cookie Policy**

### **What are cookies?**

Cookies are small text files that are downloaded and stored on your computer, tablet or smartphone by websites that you visit. These files are used to help the website work, provide information to the owners of the site or enhance your usage of the website.

A cookie records your preferences when using a particular site, ensuring that you are not shown the same information and/or are only shown information you have stated that you are interested in. In order to use the Site you agree to let cookies be saved as they are an important part of navigation of the Site.

The following are examples of information we may collect:

- Information about your device browser and operating system
- Your internet protocol (IP) address assigned to your internet service
- The web pages you visit on our websites
- Any embedded links you view

We also use the cookie to allow you to log into the MyAccount part of the site. This will store some personal information (e.g. first name, last name, email address, phone number) that may be used should you need to fill out an enquiry form. This

information is removed when you log out of MyAccount, or when your session expires.

### **Different types of cookies**

Our websites uses two different types of cookies.

#### **First party cookies**

These are cookies that are created by and placed on your computer by the owner of the website.

This type of cookie is usually essential to the running of the website as they ensure your security and privacy when you use our secure sites, as well as enabling you to move around a website and use its features. Without these cookies, services you've asked for (such as access to secure areas) can't be provided.

These cookies don't gather information about you that could be used for marketing or remembering where you've been on the internet.

#### **Third party cookies**

These are cookies that are managed by a third party but are placed on your computer by the owner of the website. This type of cookie is often used to help monitor activity on the website or to record how visitors to the website got there.

We may use cookies, tracking pixels and similar technologies on our website to gather data about our visitors' use of our website. We use this data to improve your experience of our website, to analyse the visitors' use of the site and to provide you with relevant, interest-based marketing.

We use Google Analytics to provide us with information about your visit to our website. We do this in order to help improve our website service to customers. Their cookies typically store anonymous aggregated information such as whether a visitor has been to the site before, and the time of the current visit.

We or our third party advertisers may also use cookies to monitor the effectiveness of advertising on the site.

Where our websites make use of a 3rd party live chat service provided by Giosg, this service makes use of cookies for personalisation and analytics, tracking and storage

of data including IP address, content of chat conversations, visited URLs, referrer URL, timestamp, operating system, device, browser. For further information please visit: <https://www.giosg.com/terms-of-service>

Where we use the Adfenix service to track traffic to our property pages in order to build audiences for our online advertising based upon how our visitors interact with our site, this service is used to promote the advertising of our properties and services through social media channels, including Facebook, using the Facebook pixel, and Twitter.

For more information on how you can opt out of advertising on these channels please visit:

[https://www.facebook.com/help/109378269482053?helpref=hc\\_global\\_nav](https://www.facebook.com/help/109378269482053?helpref=hc_global_nav)

<https://help.twitter.com/en/safety-and-security/privacy-controls-for-tailored-ads>

First party and third party cookies can either be session cookies or persistent cookies.

**Session cookies** are temporary cookies which remain on your device whilst you are on our website. They are automatically deleted when you leave the website or close your browser or

**Persistent cookies** remain on your computer either until they reach a pre-set expiry date, or you choose to remove them.

#### First party cookies that we currently use

Name	Scope	Provider	Duration
UMB_UPDCHK	Backend (CMS)	Sequence (UK)	7 days

	admin area)		
UMB_UCONTEXT	Backend (CMS admin area)	Sequence (UK)	1 day
UMB_PREVIEW	Backend (CMS admin area)	Sequence (UK)	1 month
UMB-XSRF-TOKEN	Backend (CMS admin area)	Sequence (UK)	30 mins
UMB-XSRF-V			
SequenceAuctionsAuthCookie	Frontend	Sequence (UK)	30 mins
NID	Frontend	Google	6 months
ISAWPLB	Frontend	Microsoft	Session
ARRAffinity	Frontend	Microsoft	30 mins

app.css	Frontend	Sequence (UK)	1 month
allowcookies	Frontend	Sequence (UK)	6 months

### Third party cookies that we currently use

Name	Scope	Provider	Duration
NID	Frontend	Google	6 months
ISAWPLB	Frontend	Microsoft	Session
ARRAffinity	Frontend	Microsoft	30 mins
ai_session	Frontend	Microsoft	30 mins
ai_user	Frontend	Microsoft	1 year
_ga	Frontend	Google	2 years
_gat_UA-4257901-2	Frontend	Google	1 min

_gid	Frontend	Google	1 day
__sharethis_cookie_test__	Frontend	ShareThis	Session
__stid	Frontend	ShareThis	1 year

### **How to change your cookie settings**

You can stop cookies from being placed on your computer. However, if you do this for our website you will not be able to use some of the online services we offer, for example it would not be possible to manage your accounts online or to apply for an account online.

If you want to change your cookie settings, you will need to change the cookie settings in your web browser. Each web browser is different, and you can find out how to do this in your browser's help section.

Alternatively, you can visit <http://aboutcookies.org.uk/managing-cookies> where you can find specific information about cookies and how to manage them to suit your preferences. However, please be aware that disabling cookies will make browsing our website much slower and may mean that some of our online services will not work.

Last Update 20<sup>th</sup> October 2020