



PRIVACY POLICY

By accessing, browsing or otherwise using our website you confirm that you have read, understood and agree to the terms of this Privacy Policy.

WHO WE ARE

This website is owned and operated by Grays Limited for the benefit of Grays Estate Agents and its related entities ("**Grays**"). Grays Limited is an Isle of Man registered company (Company No 133557C). If you would like to get in touch with us in relation to this privacy notice, contact details may be found in the "Contact Us" section or the footer below.

YOUR INFORMATION

We collect information that personally identifies you during the course of providing services to you or receiving services from you,
The information we collect about you comes from:

- your registration on www.graysestateagents.com;
- contact forms on the website and enquiries over email;
- viewings/valuations or events that you register to attend with us;
- publications and notifications that you sign up to receive from us;
- application forms or other materials you submit to us during the course of your relationship with us;
- your interactions with us, transactions and use of our products and services (including the use of our website);
- your business dealings with us, including via email, telephone or as stated in our contracts with you;
- depending on the products or services you require, third parties (including for credit and money laundering checks, among other things); and
- recording and monitoring tools that we use for compliance or security purposes (e.g. recording of telephone calls, monitoring emails, etc.).

PERSONAL INFORMATION

If you are our client or customer, we collect information that helps us to identify you and to manage your business with us, whether as a landlord, tenant, purchaser of property, vendor of property or a prospective purchaser or vendor. We also collect financial information about you, information about your transactions with us and information required for us to carry out credit, money laundering and other checks and to comply with our legal obligations.

Where you are our client or customer, the Personal Information that we may collect includes:

- your name, title and contact details;
- your professional title and occupation;
- your age and marital status;



- financial information;
- IP address or our internal electronic identifiers;
- information which we need to conduct 'know your client' checks such as details relating to your passport and credit history; and
- other information you provide to us during your dealings with us or which we require to provide you with Grays's services.

In limited cases, we also collect special categories of information. Our money laundering, sanctions, financial crime and fraud prevention checks sometimes result in us obtaining information about actual or alleged criminal convictions and offences, as well as in respect of Politically Exposed Persons.

You are not obliged to provide us with your information where it is requested but we may be unable to provide certain products and services or proceed with our business relationship with you if you do not do so. Where this is the case, we will make you aware.

USE OF YOUR PERSONAL INFORMATION

We will only collect, use and otherwise handle your Personal Information when it is necessary for our legitimate interests in connection with the operation of our business, and to improve the quality of the service that we provide to you. When processing your information, we do so in our legitimate interests (as set out in the bullet points below), because of legal obligations that we are subject to or because the information is required either in order to provide our products or services to you or to receive products and services from you in accordance with a contract.

Where we process "special categories" of personal information about you, we do so either because you have given us your explicit consent, we are required by law to do so or the processing is necessary for the establishment, exercise or defence of a legal claim.

We may also use your information for the purposes of the following legitimate interests:

- in connection with Grays's internal management and reporting;
- to identify the geographical location of visitors to our website, and their areas of interest type, so we can display information about appropriate properties and services (for further information about the cookies we use on our website, please see the below section outlining our cookies policy)
- to facilitate our internal business operations, including acting in accordance with our policies and fulfilling our legal and regulatory requirements.

HOW WE SHARE YOUR INFORMATION

We share certain information with certain third parties for the purposes set out in this policy.

We disclose personal information to third parties, subcontractors, agents, and any person who provides professional, legal or accounting advice or other services to Grays, who will use such information in the course of either fulfilling contractual obligations or in the provision of advice or other services to you and in pursuit of the purposes that we specify below:



- in order to carry out anti-money laundering checks and related actions which Grays considers appropriate to meet any legal obligations imposed on it, or the processing in the public interest, or to pursue the legitimate interests of Grays in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with Grays's anti-money laundering procedures;
- to, where applicable, report tax related information to tax authorities in order to comply with a legal obligation;
- to monitor and record calls and electronic communications for (i) processing verification of instructions; (ii) investigation and fraud prevention purposes; (iii) for crime detection, prevention, investigation and prosecution; (iv) to enforce or defend Grays's rights, itself or through third parties to whom it delegates such responsibilities or rights in order to comply with any legal obligation imposed on Grays; (v) to pursue the legitimate interests of Grays in relation to such matters; or (vi) where the processing is in the public interest;
- to disclose information to other third parties such as service providers of Grays, auditors, regulatory authorities and technology providers in order to comply with any legal obligation imposed on Grays, to fulfill our contract with you or in order to pursue the legitimate interests of Grays;
- to monitor and record calls/emails/communications for quality, business analysis, training and related purposes in order to pursue the legitimate interests of Grays to improve our service delivery;
- to update and maintain records; and/or
- to retain records of AML checks and other similar records of individuals to assist with subsequent screening of them by Grays.

In addition, we may share information with a potential buyer, transferee, or merger partner or seller and their advisers in connection with any actual or potential transfer or merger of part or all of Grays's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it.

Our website offers the possibility to share content on social media channels (i.e. Facebook, Twitter, Instagram, Google+, LinkedIn and Pinterest). The respective social media provider will directly gather Personal Information only after you click on the corresponding sharing button. Please refer to the privacy policy of the relevant social media providers to learn more about what Personal Information is collected and used by them.

We also share your personal information or any portions thereof to regulators, government bodies and law enforcement agencies (a) as required by, or to comply with, applicable law, regulation, court process or other statutory requirement; and (b) at the request of any regulatory, supervisory or governmental authorities.

Where we share your information, we require those receiving it to put in place appropriate security and confidentiality measures to protect it, and we require that they only use your personal information on our behalf and in line with our instructions, consistent with the terms of this Privacy Policy.



RETENTION OF INFORMATION

It is our policy to retain your Personal Information for the length of time required for the specific purpose or purposes for which it was collected as set out in this policy. However, on occasion we may be required to store some data for a longer period for example when required by law. In those circumstances, we will ensure that your Personal Information will continue to be treated in accordance with this policy. We will have regard to the following when determining how long we will retain your personal information:

- as long as is necessary for the relevant activity or as long as is set out in any relevant contract you enter into with us;
- the length of time it is reasonable to keep records to demonstrate compliance with professional or legal obligations;
- any retention period that is required by law; or
- the end of the period in which litigation or investigations might arise in respect of the services that we provide to you (generally 6 years).

YOUR RIGHTS

Right of access to personal information

Grays Limited will provide any individual with access to their personal data upon request, unless, and to the extent necessary, that the right of access is restricted.

Other rights

If we do hold information about you, you can ask us to correct any mistakes. You also have the right, subject to any statutory limitations, to object to processing, to erasure or restriction of processing, and to data portability. No automated decisions, or profiling, are undertaken by Grays.

Please use the contact details below to exercise any of your rights. We may require additional information in order to identify you or the information you seek.

These rights are not absolute: they do not always apply and exemptions may be engaged. We may, in response to a request, ask you to verify your identity and to provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.

If you are unhappy with the way we have handled your information you have a right to the Isle of Man Information Commissioner.

CONFIDENTIALITY

We acknowledge that the information you provide us may be confidential. We do not sell, rent, distribute or otherwise make Personal Information commercially available to any third party, except that we may have information with our service providers for the purposes set



out in this policy. We will maintain the confidentiality of and protect the privacy of your personal information in according with this policy and all applicable laws.

CHANGES TO THIS PRIVACY POLICY

We may change and/or update this policy from time to time and when we do so, we will publish the revised policy on our website. Last updated 10th January 2022