

This is the privacy notice of **Bright Willis Ltd**

We are registered with the **Information Commissioners Office (ICO)**

Our registered office is at **1323 Stratford Road, Hall Green, Birmingham B28 9HH**

This is a notice to tell you our policy about all information that we record about you. It covers both information that could identify you and information that could not.

We are extremely concerned to protect your privacy and confidentiality. We understand that all users of our web site are quite rightly concerned to know that their data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party. Our policy is both specific and strict. It complies with UK law. If you think our policy falls short of your expectations or that we are failing to abide by our policy, do please tell us.

Except as set out below, we do not share, or sell, or disclose to a third party, any personally identifiable information collected at this site.

Here is a list of the information we collect from you, either through our web site or because you give it to us in some other way, and why it is necessary to collect it:

1. What is personal Data?

Personal data is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

2. Where we get personal information from?

- Information we collect when you visit or create an account on our websites
- Information we collect directly from you, either through face to face contact, by telephone, email or electronic communications such as messaging or through the internet
- Information provided to us by third parties
- Information from publicly available sources, for example, Companies House, Land Registry

3. What information we collect from you

We may collect some or all of the following personal information depending on the service we are completing for you:

- Full Name
- Email address
- Contact telephone numbers
- Postal address
- Date of birth
- Gender
- Next of kin
- Job title
- Profession
- Your communication preferences

Further information may be requested from you during the course of our relationship which is relevant to the provision of specific services.

4. Basic identification and contact information

Your personal information may be used for the following purposes:

- to comply with our legal and regulatory obligations
- to provide and manage your account
- to provide and manage access to our site
- to provide you with the services which you request
- for verifying your identity for security purposes
- to provide property management services
- to communicate with you

5. Lawful basis for processing

Bright Willis processes your information under any of the following lawful conditions:

5.1 Performance of a contract

This is where the collection and processing of your data is necessary for the performance of a contract with you, or in order to take steps at your request prior to entering into a contract.

5.2 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.

5.3 Consent

Where we process information under consent we will seek your clear and unambiguous consent before processing your data.

5.4 Legitimate interests

Some information is processed by Bright Willis as part of its legitimate interests which include network and information security, opting out of communications, direct marketing, web analytics, updating customer details and other core services provided.

6. Retention of your personal information

Personal data is only retained for as long as necessary for the purpose of processing. Retention periods can vary based on the purpose the data was provided, the requirements of the business and the lawful reason for processing.

There are some legal requirements which apply to personal data retention; our minimum retention period is 12 months and the maximum period is 7 years from the date the business transaction is ended.

Where there are no legal requirements, data is destroyed or deleted;

- when you withdraw your consent
- when the data is no longer up to date
- the purpose for which it was provided is no longer valid

7. Your domain name and e-mail address

Your domain name and e-mail address are recognised by our servers and the pages that you visit are recorded.

We shall not under any circumstances divulge your e-mail address to any person who is not an employee or contractor of ours and who does not need to know, either generally or specifically.

This information is used:

- 7.1 to correspond with you or deal with you as you expect.
- 7.2 in a collective way not referable to any particular individual for the purpose of quality control and improvement of our site.

8. Financial information relating only to your debit/credit cards

This information is taken by a member of staff over the telephone to accept payments. It is put directly through our banking systems whilst you are on the telephone and is not stored anywhere in our records.

9. Note on padlock symbols and other trust marks

You will note that we have a padlock icon at the top of our website which certifies a high level of safety for your personal information.

10. Business and personal information

This includes all information given to us such as information you give us in your capacity as our client. We undertake to preserve the confidentiality of the information and of the terms of our relationship. It is not used for any other purpose. We expect you to reciprocate this policy.

We keep information which forms part of our business record for a minimum of six years. That is because we may need it in some way to support a claim or defence in court. That is also the period within which our tax collecting authorities may demand to know it.

11. Calling our office

When you call our office, we may collect Calling Line Identification (CLI) information. We use this information to help improve the efficiency and effectiveness of our help line. Telephone calls either to or from our teams may be recorded for compliance, training and monitoring purposes. Please note any recordings will be held for 2 - 4 weeks before being deleted (this variance is due to storage capacity).

12. Sending a message to our support system

When you send a message, we collect the data you have given to us in that message in order to obtain confirmation that you are entitled to receive the information and to provide to you the information you need. We record your request and our reply in order to increase

the efficiency of our business/organisation. We may keep personally identifiable information associated with your message, such as your name or email address.

13. Disclosure to Government and their agencies

We are subject to the law like everyone else. We may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

14. Review or update personally identifiable information

At any time you may review or update the personally identifiable information that we hold about you by contacting us at brightwillis.co.uk. To better safeguard your information, we will also take reasonable steps to verify your identity before granting access or making corrections to your information.

15. Sale of your personal information

We do not rent, sell or otherwise disclose any of your information to any person outside our business.

16. Compliance with the law

This confidentiality policy has been compiled so as to comply with the law of every jurisdiction in which we aim to do business. Under the GDPR, you have the following rights;

- a. The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.
- b. The right to access the personal data we hold about you.
- c. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- d. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have.
- e. The right to restrict (i.e. prevent) the processing of your personal data.
- f. The right to object to us using your personal data for a particular purpose or purposes.
- g. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract,

and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

- h. Rights relating to automated decision-making and profiling.

17. Your right to complain

Any complaints will be handled under our Complaints Procedure. A copy can be requested by contacting enquiries@brightwillis.co.uk.

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and, if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

18. Your right to complain to the Information Commissioners Office (ICO)

You have the right to complain to the Information Commissioner's Office if you feel unhappy with the way we process your data.

The Information Commissioners Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Alternatively, please visit www.ico.org.uk for more information

19. Our contact information

Should you wish to contact us regarding this privacy policy, your personal data and data protection, including to make a subject access request, please use the following details:

by email: enquiries@brightwillis.co.uk

by phone: 0121 693 6000

by post: Bright Willis Ltd, 1323 Stratford Road, Hall Green, Birmingham B28 9HH

20. Changes to this Policy

Any changes we may make to this policy in the future will be posted on this page. Please check back from time to time review this Policy and keep up to date.