

# Privacy policy

# bramleys

Bramleys LLP (“Bramleys”) and Bramleys Financial Consultants LTD (“BFC”) as Data Controllers, are committed to ensuring their compliance with the requirements of the law governing the management and storage of personal data, which is set out in the UK’s Data Protection Act and the EU’s General Data Protection Regulation 2016 (“GDPR”). We recognise the importance of personal data to our business and the importance of respecting the privacy rights of individuals. This privacy policy statement explains the data processing practices of Bramleys and BFC in line with the GDPR. Compliance with GDPR and data protection is overseen by the UK data protection regulator which is the Information Commissioner’s Office (“ICO”). Bramleys and BFC are accountable to the ICO for its data protection compliance. If you have any requests concerning your personal information or any queries with regards to these practices please contact our Data Protection Manager Graeme Haigh by email.

Personal information is collected by Bramleys or BFC for and on behalf of Bramleys or BFC only.

## Some helpful definitions

**Data Subject** means any living individual for which personal data is held. For the purpose of this policy, the data subjects are our clients, meaning, but not exclusively limited to, purchaser, vendors, landlords, viewers, general enquirers, survey clients, solicitors, contractors, mortgage clients.

**Data Controller** means a person or organisation which decides what personal data will be collected, how and why. For the purpose of this policy, we Bramleys LLP (Bramleys) and Bramleys Financial Consultants LTD (BFC) are the data controllers.

**Data Protection Manager** means the person responsible for overseeing this policy and collecting, storing and processing of personal data by us (Bramleys and BFC). The person who has responsibility for this role may change from time to time but at the present time is Graeme Haigh.

**Data Users** means any member of staff whose work involves collecting, storing or processing personal data. This will vary depending

on the personal data being collected, stored and processed.

**Data Processor** means any person who or organisation which collects, stores and process personal data on our behalf. The number and identity of the Data Processors we use may change from time to time, but at the present time they include:

- The Property Software Group who provide a software solutions for Residential and Commercial Departments.
- Quest and Xit2 who provide a software solution to our Surveying Department.
- Trigold who provide a software solution for Bramleys Financial Consultants Ltd.
- EC software who oversee our IT solutions.
- The Ark design, print and digital and in@4 who provide marketing and website support.
- Smart Search UK who provide Anti Money Laundering checks.
- Homelet who provide our tenant referencing solutions.
- Rapide Reprographics who operate our secure waste disposal and have access to personal data as above placed in the secure waste units.
- Green IT Disposal Ltd who operate our secure disposal of old computer and IT equipment.
- Solicitor and Conveyancing firms including but not exclusively limited to:  
 Advantage Property Lawyers, Angela Viney, Bailey Smalles, Beaumont Legal, Blacks Solicitors, Brearleys, Chadwick Lawrence, Deborah Hoban, Derek Adkins, Eaton Smith, Finn Gledhill, Gaddes Noble, Greenhead Solicitors, GM Wilson, Harmony Law, Holroyd & Co, Ison Harrison, Jordans, Kingswell Watts, Musa Patel, Nick Haigh, Oates Hanson, O’Neill Patient, PM Law, Premier Property Lawyers, Ramsdens, Ridley & Hall, Schofield Sweeney, Shulmans, Stephan Ptycia & Co, Switalskis, Wilkinson Woodward.
- Banks, lenders and insurance companies in association with BFC including but not exclusively limited to:  
 AIG, Accord, Aegon, Aviva, BM Solutions, Barclays, Coventry, Exeter FS, Halifax, Kensington, L&G, LV, Leeds, Marsden, Metro, Monmouth, Nat West, Nationwide, Nottingham, Platform, Precise, Principality, Royal London, Santander, Scottish Widows, Skipton, TMW, TSB, Virgin.

## Collection of personal data

We collect personal data through:

- the use of enquiry and registration forms;
- the provision of your details to us either online or off-line.

The elements of your data that we collect may include:

- Name
- Job title
- Company name
- Company address, phone and fax number
- Home address and phone number
- Mobile telephone number
- Email address
- Payment details such as credit card information.

If you are a bramleys.com subscriber we may also collect information regarding your use of the service.

## Use of personal information

Depending on which department you are enquiring and interacting with will depend on what data is held about you and for what period of time. The information below details how your data will be held, for what period of time for the relevant department and the relevant transaction stage.

In order to process all personal data in a manner that is compliant with GDPR, Bramleys and BFC will:

- fully observe the conditions regarding the fair collection and use of personal data;
- meet its obligations to specify the purposes for which personal data is used;
- collect and process appropriate personal data only;
- ensure the quality of personal data used;
- apply strict checks to determine the length of time personal data is held;
- ensure that the rights of individuals about whom the personal data is held can be fully exercised under applicable laws;
- take the appropriate technical and organisational security measures to safeguard personal data; and
- ensure that personal data is not transferred abroad without suitable safeguards.

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# Residential Sales

Activity	Information held	Who is collecting	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How is it stored	When will it be deleted
General enquiry for property details	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send required information	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 months
Mailing list request	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send requested information.	Consent	Staff, Software providers, marketing company.	Electronically and/or on paper	After 6 months
Viewings	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals.	Consent	Staff, Software providers, vendors.	Electronically and/or on paper	After 6 months
Market Appraisals	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and the location address of the property to be valued. Staff security.	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 years
Confirming instructions to sell the property	Name, Phone number, Address, Email, ID	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and update the software systems.	Contractual	Staff, Software providers.	Electronically and/or on paper	6 years after the closure of the file.
Making an offer	Name, Phone number, Address, Email Ability to fund purchase, ID.	Staff.	Phone call, Email, Letter, in person	To address individuals and update progression.	Contractual	Staff, Software providers.	Electronically and/or on paper	After 12 months
Acceptance of an Offer	Name, Phone number, Address, Email, Ability to fund purchase. Solicitors details, ID.	Staff.	Phone call, Email, Letter, in person	To address individuals and update progression.	Contractual	Staff, Software providers. Vendors, Vendors solicitors, purchaser solicitors, Agents in linked transaction, purchasers' surveyors and contractors to carry out reports.	Electronically and/or on paper	After 12 months
Offers proceeding to completion of the sale	Name, Phone number, Address, Email, Ability to fund purchase. Solicitors details, ID.	Staff.	Phone call, Email, Letter, in person	To address individuals and update progression.	Contractual	Staff, Software providers.	Electronically and/or on paper	6 years after the closure of the file.

# Commercial Sales

Activity	Information held	Who is collecting	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How is it stored	When will it be deleted
General enquiry for property details	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send required information	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 months
Mailing list request	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send requested information.	Consent	Staff, Software providers, marketing company.	Electronically and/or on paper	After 6 months
Viewings	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals.	Consent	Staff, Software providers.	Electronically and/or on paper	After 6 months
Market Appraisals	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and the address of the property to be valued.	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 years
Confirming instructions to sell the property	Name, Phone number, Address, Email, ID	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and update the systems.	Contractual	Staff, Software providers.	Electronically and/or on paper	6 years after the closure of the file.
Making an offer	Name, Phone number, Address, Email Ability to fund purchase, ID.	Staff.	Phone call, Email, Letter, in person	To address individuals and update progression.	Contractual	Staff, Software providers.	Electronically and/or on paper	After 12 months
Acceptance of an Offer	Name, Phone number, Address, Email, Ability to fund purchase. Solicitors details, ID	Staff.	Phone call, Email, Letter, in person	To address individuals and update progression.	Contractual	Staff, Software providers. Vendors, Vendors solicitors, purchaser solicitors, Agents in linked transaction, purchasers surveyors and contractors to carry out reports.	Electronically and/or on paper	After 12 months
Offers proceeding to completion of the sale	Name, Phone number, Address, Email, Ability to fund purchase. Solicitors, ID.	Staff.	Phone call, Email, Letter, in person	To address individuals and the address of the property to be valued.	Contractual	Staff, Software providers.	Electronically and/or on paper	6 years after the closure of the file.

# Residential Lettings

Activity	Information held	Who is collecting	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How is it stored	When will it be deleted
General enquiry for property details	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send required information	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 months
Mailing list request	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send requested information.	Consent	Staff, Software providers, marketing company.	Electronically and/or on paper	After 6 months
Viewings	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals.	Consent	Staff, Software providers.	Electronically and/or on paper	After 6 months
Market Appraisals	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and the address of the property to be valued.	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 years
Confirming instructions to let out the property	Name, Phone number, Address, Email, Bank details. Next of kin if overseas client, ID.	Staff,	Phone call, Email, Letter, in person	To address individuals and update the systems. Remunerate landlord.	Contractual	Staff, Software providers. HSBC, HMRC.	Electronically and/or on paper	6 years after the closure of the file.
Applying for a property	Name, Phone number, Address, Email, Credit history employment details, financial ability to proceed. Guarantor details, ID.	Staff.	Phone call, Email, Letter, in person. Application form paper and/or electronic.	To address individuals and update progression.	Contractual	Staff, Software providers. Homelet, landlord.	Electronically and/or on paper	After 12 months
Right to rent check	Name, Address, passport, visa details, ID.	Staff	In person.	Legal requirement	Contractual	Staff, Software providers. Homelet	Electronically and/or on paper	After 12 months
Acceptance Of applying for a property.	Name, Phone number, Address, Email, Ability to fund purchase. Next of kin, ID.	Staff.	Phone call, Email, Letter, in person	To address individuals and update progression.	Contractual	Staff, Software providers, landlord.	Electronically and/or on paper	After 12 months
Agreeing the tenancy	Name, Phone number, Address, Email, post tenancy contact address	Staff.	Name, Phone number, Address, Email	Legal requirement	Contractual	Staff, Software providers, landlord	Electronically and/or on paper	6 years after the closure of the file.
On going management of the tenancy.	Name, Phone number, Address, Email, ID.	Staff	Phone call, Email, Letter, in person	To facilitate contractors for repairs.	Contractual	Staff, Software providers, landlord, contractors	Electronically and/or on paper	6 years after the closure of the file.

# Commercial Lettings

Activity	Information held	Who is collecting	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How is it stored	When will it be deleted
General enquiry for property details	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send required information	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 months
Mailing list request	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send requested information.	Consent	Staff, Software providers, marketing company.	Electronically and/or on paper	After 6 months
Viewings	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals.	Consent	Staff, Software providers.	Electronically and/or on paper	After 6 months
Market Appraisals	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and the address of the property to be valued.	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 years
Confirming instructions to let out the property	Name, Phone number, Address, Email, bank details. Next of kin if overseas client, ID.	Staff,	Phone call, Email, Letter, in person	To address individuals and update the systems. Remunerate landlord.	Contractual	Staff, Software providers. HSBC, HMRC.	Electronically and/or on paper	6 years after the closure of the file.
Applying for a property	Name, Phone number, Address, Email, employment details, financial ability to proceed, Guarantor details.	Staff.	Phone call, Email, Letter, in person. On line application.	To address individuals and update progression.	Contractual	Staff, Software providers. Landlord.	Electronically and/or on paper	After 12 months
Acceptance of applying for a property.	Name, Phone number, Address, Email, Ability to fund purchase.	Staff.	Phone call, Email, Letter, in person	To address individuals and update progression.	Contractual	Staff, Software providers, landlord.	Electronically and/or on paper	After 12 months
Agreeing the tenancy	Name, Phone number, Address, Email, post tenancy contact address	Staff.	Name, Phone number, Address, Email	Legal requirement	Contractual	Staff, Software providers, landlord.	Electronically and/or on paper	6 years after the closure of the file.
On going management of the tenancy.	Name, Phone number, Address, Email, ID.	Staff	Phone call, Email, Letter, in person	To facilitate contractors for repairs.	Contractual	Staff, Software providers, landlord, contractors	Electronically and/or on paper	6 years after the closure of the file.

# Auctions

Activity	Information held	Who is collecting	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How is it stored	When will it be deleted
General enquiry for property details	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send required information	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 months
Mailing list request	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send requested information.	Consent	Staff, Software providers, marketing company.	Electronically and/or on paper	After 6 months
Viewings	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals.	Consent	Staff, Software providers.	Electronically and/or on paper	After 6 months
Market Appraisals	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and the address of the property to be valued.	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 years
Confirming instructions to sell the property	Name, Phone number, Address, Email, ID.	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and update the systems.	Contractual	Staff, Software providers.	Electronically and/or on paper	6 years after the closure of the file.
General bidding at auction	Name, Phone number, Address, Email, ID	Staff	Email, Letter, in person	Legal requirement	Contractual	Staff, Software providers.	Electronically and/or on paper	1 month after the auction date
Successful bid and purchase at auction itself	Name, Phone number, Address, Email, ID	Staff	Phone call, Email, Letter, in person	Legal requirement	Contractual	Staff, Software providers.	Electronically and/or on paper	6 years after the closure of the file.
Making an offer before or after the auction	Name, Phone number, Address, Email Ability to fund purchase, ID	Staff.	Phone call, Email, Letter, in person	To address individuals and update progression.	Contractual	Staff, Software providers.	Electronically and/or on paper	After 12 months
Acceptance of an Offer before or after auction	Name, Phone number, Address, Email, Ability to fund purchase. Solicitors details, ID	Staff.	Phone call, Email, Letter, in person	To address individuals and update progression.	Contractual	Staff, Software providers. Vendors, Vendors solicitors, purchaser solicitors, Agents in linked transaction, purchasers surveyors and contractors to carry out reports.	Electronically and/or on paper	After 12 months
Offers proceeding to completion of the sale	Name, Phone number, Address, Email, Ability to fund purchase. Solicitors details, ID.	Staff.	Phone call, Email, Letter, in person	To address individuals and the address of the property to be valued.	Contractual	Staff, Software providers.	Electronically and/or on paper	6 years after the closure of the file.

# Surveys

Activity	Information held	Who is collecting	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How is it stored	When will it be deleted
General enquiry for survey	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send required information	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 months
Confirming instructions to value the property	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To undertake valuation instruction, address individuals and update the systems.	Contractual	Staff, Software providers.	Electronically and/or on paper	12 years after the closure of the file.
Undertaking the valuation	Name, Phone number, Address, Email, details of owner of the property to be valued, Agents in linked transaction, Solicitors details.	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To undertake valuation instruction, address individuals and update the systems.	Contractual	Staff, Software providers, solicitors, co-owners.	Electronically and/or on paper	12 years after the closure of the file.
3rd Party instructions (Panel valuation, court valuation)	Applicants name, address of property to be valued, access details, lender details,	Staff, Quest,Xit2.	Email	To undertake valuation instruction, address individuals and update the systems.	Contractual	Staff, Software providers, Solicitors, co-owners.	Electronically and/or on paper	12 years after the closure of the file.



# Mortgage Clients

Activity	Information held	Who is collecting	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How is it stored	When will it be deleted
General enquiry for mortgages	Name, Phone number, Address, Email	Staff, Rightmove, Bramleys website	Phone call, Email, Letter, in person	To address individuals and send required information	Consent	Staff, Software providers.	Electronically and/or on paper	After 3 months
Application for a mortgage through a 3rd party lender which is successful	Name, Phone number, Address, Email, ID. Credit history employment details, financial ability to proceed.	Staff	Phone call, Email, Letter, in person	To complete the application form	Contractual	Staff, Software providers, Lender.	Electronically and/or on paper	After 12 years
Application for a mortgage through a 3rd party lender which is unsuccessful	Name, Phone number, Address, Email, ID. Credit history employment details, financial history.	Staff	Phone call, Email, Letter, in person	To complete the application form	Contractual	Staff, Software providers, Lender.	Electronically and/or on paper	After 3 months
Application for insurance through a 3rd party lender which is successful	Name, Phone number, Address, Email, ID. Credit history employment details, financial history.	Staff	Phone call, Email, Letter, in person	To complete the application form	Contractual	Staff, Software providers, Insurer.	Electronically and/or on paper	After 12 years
Application for insurance through a 3rd party lender which is unsuccessful	Name, Phone number, Address, Email, ID. Credit history employment details, financial history.	Staff	Phone call, Email, Letter, in person	To complete the application form	Contractual	Staff, Software providers, Insurer.	Electronically and/or on paper	After 3 months

# Recruitment

Activity	Information held	Who is collecting	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How is it stored	When will it be deleted
Application for employment	Name, Phone number, Address, Email, existing employers, work history, educational history.	HR department	Email, letter, CV, in person, application form	To establish suitability for the role applied for.	Consent	HR department, office/department heads, Partners.	Electronically and/or on paper	After 6 months

# Complaints

Activity	Information held	Who is collecting	How is it collected	Why is it collected	Lawful basis for processing	Who will it be shared with	How is it stored	When will it be deleted
Complaint against the company or individual	Name, Phone number, Address, Email	Staff, Bramleys website, Social Media	Phone call, Email, Letter, in person	To address individuals and the nature of the complaint in order to resolve the issue.	Consent	Staff, office and department heads, Partners.	Electronically and/or on paper	6 years after the closure of the file.

# Notes

**Please note we do not have any automated decision-making or profiling.**

## Subject access requests and other disclosures

The GDPR gives rights to individuals in respect of the personal data organisations hold about them.

These rights include:

- Right of information and access to confirm details about personal data that is being processed about them and to obtain a copy;
- Right to rectification of any inaccurate personal data;
- Right to erasure of personal data held about them (in certain circumstances);
- Right to restriction on the use of personal data held about them (in certain circumstances);
- Right to portability – right to receive data processed by automated means and have it transferred to another data controller;
- Right to object to the processing of personal data.

A formal request from a data subject for information that we hold about you should be addressed to the Data Protection Manager. Bramleys and BFC aim to comply with requests for access to personal information as quickly as possible, and, if we hold such information, will ensure that it is provided within one month of the request unless there is a proper reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

## Anti-Money Laundering

In addition to help you with a property related service we have to comply with certain regulations for example the “Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to as “the Regulations).” Bramleys or BFC are required to obtain certain information from you to comply with regulations. The information provided will only be used by Bramleys or BFC in relation to complying with the Regulations and will not be shared with any other party outside of the company unless we are required to do so under law.

If you decide to enter in to a business relationship with Bramleys or BFC you must comply with certain regulations.

We will require two separate Identification documents one primary and one secondary document even if it appears on both lists. The information may be required at various stages of the process depending whether you are Purchasing, Selling, Letting or Renting with Bramleys, or undertaking mortgage applications with BFC.

### Primary documents – proof of ID

- Valid Passport with MRZ
- Valid full UK photo driving licence
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Valid EU/EEA/Switzerland photo driving licence.
- Valid EU/EEA/Switzerland national Identity Card.
- Valid UK Armed Forces ID Card.
- Valid UK Biometric Residence Permit (copy of both sides.)
- Valid Blue disabled drivers pass. (With photo)
- Valid Freedom Pass
- Valid Local Authority Bus pass.
- Department for Works & Pensions letter confirming pension details including
- National Insurance Number dated within the last 12 months.

### Secondary documents – proof of residence (home)

- Valid full UK photo driving licence.
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Local authority council tax bill (dated within the last 12 months).
- UK Bank/Building societies statements/bills showing activity, dated within the last six months. Including account number and sort code. (Internet printed acceptable.)
- UK mortgage statement (dated within the last 12 months.) (Internet printed acceptable.)
- Utility bill dated within the last 6 months including – Electricity bill (with MPAN number), Landline, Gas, Satellite TV, Water. (Internet printed acceptable.) (Not mobile phone bills.)

- Her Majesty’s Revenue and Customs (HMRC) Inland Revenue (IR) Coding/assessment/statement (dated within the last 12 months) with National Insurance number.
- Department for Works & Pensions letter confirming pension details and NI Number. (Dated within the last 12 months).

We reserve the right to employ third party electronic verification for the purpose of verifying identity. This search will not affect your credit rating. The company who we employ for this role may change from time to time but at the present time is Smart Search UK.

## Use of Cookies and Other Tracking Devices

The site may from time to time contains links to third-party sites which are not subject to this privacy policy. We recommend that you read the privacy policy of any such sites you visit.

We use cookies to help personalise your use of our sites. A cookie is a small piece of information which is sent to your computer’s hard drive by the web server so that the website can remember who you are. This information may include information relating to your use of our sites, information about your computer such as the computer’s IP address and browser type, demographic data and, if you arrived at our site via a link from third party site, the URL of the linking page. We use information from cookies for purposes which may include:

- identifying returning users, registrants and subscribers and to allow subscribers to be presented with a personalised version of the site
- eliminating the need for returning users to re-enter their login details
- enabling you to move more easily around our site
- tracking your use of our site to better develop our sites in accordance with your requirements
- building up a demographic profile

You can delete cookies from your hard drive at any time however this will mean that any settings such as your stored username and password will have to be reset. You can set your internet browser so that it will not allow cookies to be stored on your computer.

This may reduce functionality of the site, prevent access to subscriber-only areas of the site and mean that certain features or content will not be available to you. Further information on how to prevent cookies from being stored on your computer can be found on <http://www.allaboutcookies.org> under the “manage cookies” section. Alternatively go to the help menu within your internet browser.

We may use pixels, or transparent GIF files, to help manage online advertising. These GIF files may be provided by either of our ad management partners, DoubleClick or Atlas. These files enable DoubleClick or Atlas to recognize a unique cookie on your Web browser, which in turn enables us to learn which advertisements bring users to our website. With cookies the information that Atlas, and Doubleclick, also using Spotlight technology, collects is anonymous and not personally identifiable. It does not contain your name, address, telephone number, or email address. For more information about DoubleClick, including information about how to opt out of these technologies, go to <https://privacy.google.com/intl/en-GB/take-control.html>. For more information about Atlas go to <http://www.atlassolutions.com>.

Bramleys and BFC use web analytics services through either WebTrends or Google Analytics, provided by Google, Inc. WebTrends and Google Analytics uses cookies to help us to analyse how users use Bramleys sites. The information generated by the cookie about your use of our sites (including your IP address) will be transmitted to and stored on servers in the United States. They will use this information for the purpose of evaluating your use of our sites, compiling reports on website activity for us and providing other services relating to website activity and internet usage. They may also transfer this information to third parties where required to do so by law, or where such third parties process the information on their behalf. They will not associate your IP address with any other data held by WebTrends or Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of Bramleys sites. By using this website, you consent to the processing of data about you by WebTrends and Google in the manner and for the purposes set out above.

## Children under 14

We do not intentionally collect any information on children under 14 years of age. We will undertake to delete any details of such users where a parent or guardian has notified us that any such details have been obtained.

## Changes to this Policy

This policy is effective 25 May 2018. From time to time we may make changes to this privacy policy statement to reflect any changes to our privacy practices in accordance with changes to legislation, best practice or website enhancements.

## Breaches

A data protection breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Breaches will be reported to the ICO by the Data Protection Manager without undue delay and, where feasible, not later than 72 hours after having become aware of the breach, unless we are able to demonstrate that the personal data breach is unlikely to result in a risk to the rights and freedom of data subjects. Where there is a high risk to the rights and freedoms of individuals, we will also notify the affected individuals.

The Data Protection Manager will maintain a central register of the details of any data protection breaches.

## Complaints

Complaints relating to breaches of the GDPR and/or complaints that an individual's personal data is not being processed in line with the data protection principles should be referred to the Data Protection Manager without delay.