

PRIVACY POLICY

Introduction

The Miller Commercial the Miller Commercial group of companies incorporating Miller Commercial LLP, its sister Company Miller Commercial Valuers Limited and subsidiary Company Listers Property Consultants Limited, (“We “or “us”) are committed to protecting and respecting your personal information and privacy. If we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy and cookie policy. Whenever you provide such information, we are legally obliged to use your information in accordance with all applicable laws concerning the protection of personal information. This includes the Data Protection Act 1998 (DPA) and, as of May 2018, the General Data Protection Regulation (GDPR). We keep our privacy statement under regular review and changes may be made from time to time. The current version of our privacy notice will be posted on our website so that you are aware of its contents.

About us

We are a General Practice firm of Chartered Surveyors providing a wide range of professional services throughout Cornwall, Plymouth and the wider South West. Services include property management, commercial agency, business transfer, hotels & guesthouses, licensed and leisure, property valuations and lease consultancy, development and investment.

What personal information will we process about you?

We process both Personal and Sensitive (Special) categories of data. Personal data we process may include name, address and email address. It may also include an IP address and cookies (website). Due to the nature of our business, we also process Sensitive (Special) categories of data, such as biometric data (found on passports for identification and verification purposes, as required by law). Our collection methods through our website are:

- Through engagement of our services.
- By communications.
- Networking.
- Through engagement of service providers.

How will this information be processed, used, stored and protected?

In order for us to understand your needs and provide the most appropriate service and advice, we may need to collect, store and process personal data for correspondence and detailed service provision. This will be in a manner compatible with the GDPR. We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your devices.





- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes or because we have a “legitimate interest” in doing so. (A “legitimate interest” may arise, for example, when we may have been given a business card but do not have your express consent, or where we have an existing business to business relationship with you. Where we rely on “legitimate interests” we will record our decision and our method on making this decision. This can be requested by you at any time.)
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service when you choose to do so, e.g., asking a question through our website.
- To carry out necessary maintenance to our IT infrastructure.
- To notify you about changes to our service.

We also embrace the use of social media and may wish to process any comments made public by you.

When will you be contacted, and will this be marketing?

Our aim is not to be intrusive, and we undertake not to ask irrelevant questions. The information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure. We will keep your information within the ‘firm’ except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services to you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide on our behalf. This means that they cannot do anything with your personal information unless we have instructed them to do so. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. If we wish to pass your sensitive data onto a third party, we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

Your Rights

Under the GDPR your rights are:

- **The right to be informed** – We must make available this privacy notice with the emphasis on transparency over how we process your data.
- **The right of access** – You are entitled to find out what details we may hold about you and why.
- **The right to rectification** – We are obliged to correct or update your details.
- **The right to erasure** – This is also known as the request to be forgotten.
- **The right to restrict processing** – You have the right to ‘block’ or suppress the processing by us of your personal data.
- **The right to data portability** – You have the right to obtain and reuse your personal data that you have provided to us.
- **The right to object** – You have the right to object to us processing your data in relation to direct marketing and or profiling.
- **Rights in relation to automated decision making and profiling** – We do not use automatic decision making or processing.



How long will we keep your details?

Our data retention policy is dictated by the DPA/GDPR and the requirements of our governing body, the RICS, a copy of which can be requested.

Deleting, correcting and updating your details

Under GDPR you have the right to erasure under specific circumstances. This will be decided on a case-by-case basis. Please contact us for more information relating to your rights. We will correct or update your data without delay, provided you make the request in writing specifying what parts of your data is incorrect or out of date. If you have any concerns regarding this issue, please contact us.

We strive to be as open as we can be in giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the DPA and the 'Right of Access' under the GDPR, in writing to our address in this policy. Please note that you may need to provide identification in order to prove who you are to access your data. If we do hold information about you, we will respond in writing within one calendar month of your confirmed request.

The information we supply will:

- Confirm that your data is being processed.
- Verify the lawfulness and the purpose of the processing.
- Confirm the categories of personal data being processed.
- Confirm the type of recipient to whom the personal data have been or will be disclosed; and
- Let you have a copy of the information in an intelligible form.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone. If we do not hold information about you, we will also confirm this in writing at the earliest opportunity.

Complaints

You have the right to complain about the processing of your personal information. Please contact us using the details provided in this policy. If you are dissatisfied, you have the right to complain to the Information Commissioners Office. Details of which can be found on their website www.ico.org.uk.

How to contact us?

For the purposes of the DPA and GDPR, the Data Protection Officer is Thomas Smith, Partner at Miller Commercial and Director at Listers Property Consultants.

If you would like to request further information about our privacy policy or information regarding data protection, you should contact ts@miller-commercial.co.uk or write to us at the following address at Miller Commercial, Mansion House, Princes Street, Truro, Cornwall, TR1 2RF.

Website Disclaimer

We are committed to ensuring the content on this website is current and correct, however, we cannot be held responsible for any mistakes or omissions.

Dated: 24 January 2024