FINLAY BREWER
PRIVACY POLICY AND DATA PROTECTION POLICY

We keep this policy under regular review. This Privacy and Cookie Policy was last updated on 10 November 2026.

1. Who we are

This policy explains how Finlay Brewer Limited, Finlay Brewer Lettings Limited and Finlay Brewer International Limited (together "Finlay Brewer", "we", "us") collect, use and protect your personal data. We are three separate companies under common ownership, and we share one website and, in London, one branch.

- **Finlay Brewer Limited** (sales). Registered in England and Wales, company number 02686041. Registered office: Second Floor, Nucleus House, 2 Lower Mortlake Road, Richmond, TW9 2JA. ICO registration number: Z7219883.
- **Finlay Brewer Lettings Limited** (lettings and property management). Registered in England and Wales, company number 09069318. Registered office: 2nd Floor Nucleus House, 2 Lower Mortlake Road, Richmond, United Kingdom, TW9 2JA. ICO registration number: ZA399398.
- **Finlay Brewer International Limited** (international property services in France, Monaco, Montenegro and Spain). Registered in England and Wales, company number 08942120. Registered office: 2nd Floor Nucleus House, 2 Lower Mortlake Road, Richmond, United Kingdom, TW9 2JA. ICO registration number: ZA586281.

Trading as Finlay Brewer.

Our branch is at 138 Shepherds Bush Road, London W6 7PB. Telephone: 020 7371 4171.

Privacy and complaints contact (all three companies): notices@finlaybrewer.co.uk

2. Which company is responsible for your data

- **Your own client or customer data.** The company you deal with is the controller of the personal data it holds about you. For example, if you sell a property through us, Finlay Brewer Limited is the controller. If you rent or let through us, Finlay Brewer Lettings Limited is. If you use our international services, Finlay Brewer International Limited is.
- **Website data.** The three companies decide together how our website is used for the following, and are joint controllers of this data: the My Account area, saved searches and saved listings, the contact and enquiry forms, newsletter sign-ups, and analytics and cookies. We have a written arrangement between us setting out who does what. Under that arrangement, you can send any request or complaint about website data to notices@finlaybrewer.co.uk and it will be dealt with on behalf of all three companies. Whichever company you contact, we will make sure your request or complaint reaches the right place, and you can exercise your rights against any of us.
- **Sharing between our companies.** We may pass your details between our companies where this helps you. For example, if you sell a property through Finlay Brewer Limited and later wish to let

it, we may introduce you to Finlay Brewer Lettings Limited. We will only do this for the purposes described in this policy.

3. The personal data we collect

Depending on how you deal with us, we may collect:

- **Identity and contact details:** name, address, telephone numbers, email address.
- **Property and requirements:** the property you are selling, letting, buying or renting, tenure, service charges and ground rent, your budget, search criteria and viewing history.
- **Identity verification and anti-money laundering information:** photographic identification, proof of address, information about beneficial ownership, company documents and, where required, the source of funds.
- **Tenancy and landlord information:** references, employment and income details, right to rent checks, bank details, deposit and rent payment records, repair reports and inventory records.
- **Account information:** your login details and saved searches and listings.
- **Communications:** emails, letters, call notes and enquiries, including complaints. Calls to our branch are recorded, and callers are told when this is happening. We do not normally record Microsoft Teams meetings. If we ever need to record one, we will tell you first and explain why.
- **Website and device information:** IP address, browser type, pages visited, and cookie data (see section 9).
- **Recruitment information:** if you apply for a job, your CV and application details.
- **Photographs and floor plans** of properties, which may incidentally include people or personal belongings.

We get this information from you directly, from other agents, solicitors and conveyancers, landlords, tenants and buyers, identity verification and referencing providers, property portals, and publicly available sources such as the Land Registry and Companies House.

4. How we use your data and why we are allowed to

The law requires us to have a lawful basis for each use of your data.

- **Providing our services** (selling, letting, managing and marketing properties, arranging viewings, negotiating offers, handling tenancies and deposits). Basis: performing our contract with you or taking steps at your request before a contract.
- **Identity checks and anti-money laundering.** Basis: legal obligation under the Money Laundering Regulations 2017 and related law. We are legally required to check the identity of our clients, so if you do not give us the identification we ask for, we will not be able to act for you.
- **Meeting other legal obligations,** such as tax, property law, right to rent checks, material information duties, and requests from regulators or law enforcement. Basis: legal obligation.
- **Marketing a property,** including listings on our website and on property portals. Basis: performing our contract with the seller or landlord. Tenant and buyer details are not published.
- **Running our website and improving our services,** including security, troubleshooting and statistics. Basis: legitimate interests, which are to run, protect and improve our business. We balance these against your rights.

- **Keeping records and handling disputes and complaints,** including with The Property Ombudsman or in legal proceedings. Basis: legitimate interests and, where applicable, legal obligation.
- **Recording calls to our branch,** to keep an accurate record of what was said and agreed, to deal with queries, complaints and disputes, and for staff training and quality. Basis: legitimate interests.
- **Analytics cookies.** Basis: your consent (see section 9).
- **Email marketing and newsletters.** Basis: your consent, or in some cases our legitimate interest in telling existing clients about similar services (see section 5).
- **Recruitment.** Basis: legitimate interests in assessing applicants, and steps before entering a contract.

We do not use your data for automated decisions that have legal or similarly significant effects on you.

5. Third Party Data Processors

We use a small number of external companies to help us run our business, covering our property database, email, backups, phone system and website. Some of them handle a limited amount of your personal information on our behalf. Their privacy policies are listed below:

Alto (client, landlord, tenant and applicant records Processor):

https://www.altosoftware.co.uk/privacy-notice/

Rightmove (Property marketing / portal):

https://www.rightmove.co.uk/c/privacy-policy/

Zoopla (Property marketing / portal):

https://www.zoopla.co.uk/privacy/

OnTheMarket (Property marketing / portal):

https://www.costar.com/about/privacy-notice

Invisible Homes (Property marketing / portal):

https://invisiblehomes.co.uk/privacy-policy

Starberry (Website management and development):

https://www.starberry.tv/privacy-policy

Microsoft 365 (Email and file storage):

https://privacy.microsoft.com/en-GB/privacystatement

SentinelOne (Endpoint security):

https://www.sentinelone.com/legal/privacy-notice

Cove Data Protection (Backup service):

https://n-able.com/legal/privacy

Elevate UC (call recordings retained for 30 days):

https://www.intermedia.com/intermedia-privacy-policy

Elfsight (Google reviews widget):

https://elfsight.com/privacy-policy/

LeadPro (instant online valuations and postcode lookup):

https://lead.pro/legal/privacy

Yomdel (live chat):

https://www.yomdel.com/yomdel-privacy-policy

6. Marketing

We will only send you marketing emails or texts if you have opted in, or, if you are an existing client, about services similar to those you have already used from us, and you always have the chance to say no. You can unsubscribe at any time using the link in our emails or by reply. We will not share your details with third parties for their own marketing.

7. Who we share your data with

We only share your data where necessary, and with:

- **Our own companies,** as described in section 2.
- **Service providers who act on our instructions,** such as our website developer and host (Starberry), cloud storage, email and IT providers, our CRM and lettings software, identity verification and referencing providers, and email marketing providers.
- **Property portals and sub-agents** when marketing a property for a seller or landlord.
- **Solicitors, conveyancers, surveyors, mortgage brokers and other professionals** involved in your transaction.
- **Tenancy deposit and redress schemes:** the Tenancy Deposit Scheme (The Dispute Service Ltd) [TDS | Award-Winning, Government-Approved Tenancy Deposit Protection], The Property Ombudsman [The Property Ombudsman], and the Client Money Protection scheme [Client Money Protection (CMP) | Propertymark], where relevant.
- **Debt collection agencies and legal advisers,** where fees remain unpaid.
- **Regulators, law enforcement and public bodies,** including HMRC, the ICO, National Trading Standards and the National Crime Agency, where the law requires or permits it.
- **A buyer of our business,** if we are sold or merged, who would have to use your data as described in this policy.

We do not sell your personal data.

8. Transfers outside the UK

Most of the personal data we hold stays in the UK. Some of it may be handled outside the UK, for example by our international company in France, Monaco, Montenegro and Spain, or by service providers (or their staff) based in other countries.

When we send personal data outside the UK, we make sure it is protected in one of the following ways:

- **The country is covered by UK adequacy regulations,** which means the UK government has decided its laws give your data a similar level of protection. These regulations cover the European Economic Area, which includes France and Spain.
- **We use approved contract terms.** For countries without adequacy regulations, we use the UK's International Data Transfer Agreement, or the UK Addendum to the EU standard contractual clauses, with the organisation receiving the data.
- **Another lawful exception applies,** for example where the transfer is necessary to carry out a contract with you or at your request (such as buying or selling a property abroad), or you have given us your explicit consent after we have explained the risks.

You can ask us for more detail about the safeguards we use by contacting notices@finlaybrewer.co.uk.

9. How long we keep your data

We keep personal data only as long as we need it.

- **Identity and anti-money laundering records:** seven years after the end of our relationship with you. The law requires us to keep these records for at least five years. We keep them for two years longer so that we can deal with complaints, legal claims and regulatory enquiries that may arise later, as the usual time limit for bringing a contract claim in England and Wales is six years. After that, we securely delete them.
- **Sales and transaction records:** six years after completion and/or business relationship ends.
- **Lettings and tenancy records:** six years after the tenancy and/or business relationship ends.
- **Marketing preferences:** until you unsubscribe, with a record of your opt-out kept so that we do not contact you again.
- **Website account and saved searches:** until you close your account.
- **Complaints records:** six years after the complaint is closed.
- **Call recordings:** retention period of 30 days.
- **Website logs and cookie data:** see the cookie table.

After this, we delete or anonymise your data.

10. Cookies

Our website uses cookies and similar technologies. Essential cookies make the site work and do not need your consent. We only use analytics cookies, which help us understand how the site is used, if you accept them through our cookie banner. You can change your choice at any time on the cookie preferences settings.

Elfsight (Google reviews widget):

https://elfsight.com/privacy-policy/

http://FreePrivacyPolicy.com (cookie consent banner):

https://www.freeprivacypolicy.com/our-cookies-policy/

Google Ads (advertising conversion tracking, call tracking and remarketing):

https://policies.google.com/technologies/ads

Google Analytics (website analytics):

https://policies.google.com/technologies/partner-sites

Google Tag Manager (manages the analytics and advertising tags):

https://policies.google.com/privacy

LeadPro (instant online valuations and postcode lookup):

https://lead.pro/legal/privacy

Locrating (school and local area maps):

https://www.locrating.com/cookies.aspx

Meta / Facebook (advertising measurement via the Meta Pixel):

https://www.facebook.com/privacy/policies/cookies/

OpenStreetMap (maps on property search and contact pages):

https://osmfoundation.org/wiki/Privacy_Policy

Yomdel (live chat):

https://www.yomdel.com/yomdel-privacy-policy

We use advertising or tracking cookies on our website. We also advertise on Instagram, Facebook and Google. When you see or interact with our adverts on those platforms, their own privacy policies apply, and you can manage your advert preferences in your account settings with each platform.

You can also block or delete cookies in your browser settings, but some parts of the site may stop working.

11. Your rights

Under UK data protection law you have the right to:

- **be informed** about how we use your data (this policy);
- **access** a copy of the personal data we hold about you;
- **have inaccurate data corrected** and incomplete data completed;
- **have your data erased,** in certain circumstances;

- **restrict** our use of your data, in certain circumstances;
- **receive your data** in a portable format, where we use it based on consent or contract;
- **object** to our use of your data based on legitimate interests, and to direct marketing at any time (this right is absolute);
- **withdraw your consent** at any time, where we rely on it, without affecting earlier processing; and
- **not be subject to solely automated decisions** with significant effects.

To use any of these rights, contact notices@finlaybrewer.co.uk. We will normally respond within one month. We may need to confirm your identity first. Some rights have legal limits. For example, we cannot erase records we are legally required to keep, such as anti-money laundering or financial transaction records.

12. Security, breaches and children

We use appropriate technical and organisational measures to protect your data against loss, misuse and unauthorised access. No internet transmission is completely secure. If a personal data breach is likely to put your rights at risk, we will report it to the ICO within 72 hours and tell you where the law requires it.

Our services are not aimed at children under 16, and we do not knowingly collect their data.

13. Links to other sites

Our website links to third-party sites, such as property portals and schemes. They have their own privacy policies, and we are not responsible for them.

14. Changes to this policy

We will publish any changes on this page and update the “last updated” date, and where the change is significant we will tell you directly.

15. Data protection complaints procedure

This procedure applies to all three Finlay Brewer companies. It is for complaints about how we handle your personal data.

If your complaint is about our service rather than data protection, please see our Complaints Procedure for sales or lettings [Complaints Procedure], which also explains how to reach The Property Ombudsman.

Who can complain

Anyone, not only clients. You may complain on your own behalf or ask someone to complain for you, for example a solicitor, a family member or an advocate, if you give us your written permission. You do not need to use legal terms or mention any law. If we are not sure whether you are making a data protection complaint, we may ask you to clarify.

What you can complain about

Examples include how we collected, used, stored or shared your data, a response to a rights request (for example an access request), marketing you did not want, or a data breach.

How to make a complaint

- **Email:** notices@finlaybrewer.co.uk – with "Data Protection Complaint" in the subject line
- **Post:** Data Protection Complaints, Finlay Brewer, 138 Shepherds Bush Road, London W6 7PB
- **Telephone:** 020 7371 4171 (we will note your complaint and may ask you to confirm it in writing)
- **In person** at our branch.

If you tell any member of our staff, they will pass your complaint to the person responsible. Please give your name, contact details, which Finlay Brewer company you dealt with, what happened and what you would like us to do. If you need the process in another format or need help making a complaint, tell us and we will make reasonable adjustments.

What we will do

1. **Acknowledgement** We will acknowledge receipt of your data protection complaint within 30 days. This acknowledgement will confirm we have received your concern and are looking into it.
2. **Investigation** We will carry out a thorough and fair investigation into your concerns without undue delay (meaning without any unjustifiable or excessive postponement).
3. **Keep you informed.** We will keep you updated on the progress of our investigation without undue delay. If your complaint is complex and likely to take some time to resolve, we will provide you with an expected completion date and a point of contact for your questions.
4. **Outcome** Once our investigation is finished, we will provide you with a clear outcome without undue delay. We will explain what we have done to resolve your complaint and provide enough information for you to understand how we reached our conclusion.
5. **Keep a record** of the complaint, our investigation and the outcome, and use what we learn to improve how we handle data.

If you are not satisfied

You have the right to complain to the **Information Commissioner's Office** (ICO) [Information Commission's Office] at any time, and you do not have to use our procedure first. Website: ico.org.uk. Telephone: 0303 123 1113. Our ICO registration numbers are in section 1.

16. Policy Changes

Any updates we may make to our Privacy Policy in the future will be published on this page and significant changes noted below.

10 November 2026 – Expanded Privacy Policy published for the General Data Protection Regulation