SHERLOCK Privacy & Cookie Policy

Date of last review: August 2025

1. Introduction

Welcome to SHERLOCK's Privacy & Cookie Policy.

This policy explains how we collect, use, and protect your personal data when you interact with our website, contact us, or use our services.

By using our website or providing your personal information, you agree to the terms of this policy.

2. Summary of How We Use Your Data

We use your personal data to:

- Deliver our services and provide property-related information you request or that may interest you.
- Verify your identity, residency, right to live in the UK, and credit history, in compliance with legal obligations.
- Fulfil and manage any contracts entered into by you or us.
- Notify you of changes to our services.
- Process job or franchise applications.
- Conduct business administration, advertising, and analytics.
- Protect our legal rights and pursue legitimate interests.
- Carry out additional purposes where you have given consent.

We may share your data with third parties that have agreed to comply with data protection laws.

Where we rely on your consent for marketing, you may withdraw it at any time.

3. Information We Collect

We collect personal data when you interact with us, including:

- **Personal details:** name, address, phone number, email, date of birth, identification, credit history, and previous addresses.
- **Technical data:** IP address, browser type/version, time zone, operating system, and platform.
- Website usage data: pages visited, clickstream, visit duration, and interaction data (scrolling, clicks, mouse-overs).

4. Telephone Call Recording

We may record calls for legitimate business purposes. You can request that your call not be recorded, in which case we may continue correspondence via email or in writing.

Call recordings may be used to:

- Respond to queries or complaints.
- Demonstrate fair treatment.
- Maintain legally required records.
- Protect the interests of clients and staff.

All call recordings are stored securely.

5. Information Received from Third Parties

We may receive information about you from:

- Social media platforms (Facebook, X/Twitter, Google+).
- Live chat services on our website.
- Previous or current landlords (for referencing).
- Property portals and enquiry forms.
- Financial advisors, mortgage brokers, solicitors, and conveyancers.
- Other agents or service providers relevant to your transaction.

6. Purposes and Legal Basis for Processing

We process your data to:

- Fulfil contracts (e.g. property sales, lettings, mortgages, conveyancing).
- **Respond to enquiries** before a contract is in place.
- **Pursue legitimate interests**, including improving our website and personalising services.
- Comply with legal obligations, such as verifying identity and responding to official requests.
- Send marketing communications, where you have provided consent.

You can withdraw consent or object to direct marketing at any time.

7. Sharing Your Personal Data

We share data with trusted third parties for service delivery, including:

- Mortgage brokers, financial advisors, and solicitors.
- Maintenance and repair contractors (plumbers, electricians, builders, etc.).
- Surveyors, insurers, referencing agencies, and deposit protection schemes.
- Property CRMs, website hosts, and marketing platforms.
- Government and law enforcement authorities (where legally required).

All third parties must comply with data protection laws and use your information only for the agreed purposes.

If SHERLOCK is sold or merged with another business, your information may be transferred to the new owners.

8. Data Retention

- Contract data: retained for up to 6 years after your last interaction.
- **Registration data:** kept for as long as you are an active user, and up to 6 years thereafter.
- **Marketing data:** retained until you opt out. We maintain a record of opt-outs indefinitely to respect your choice.

9. Cookies and Similar Technologies

What Are Cookies?

Cookies are small text files placed on your device to help us recognise your browser and improve your experience.

We also use pixel tags and tracking URLs, collectively referred to as "Cookies."

Types of Cookies We Use

- 1. **Strictly Necessary Cookies** Required for website functionality.
- 2. **Analytical/Performance Cookies** Help us understand how our website is used (e.g. Google Analytics).
- 3. **Functionality Cookies** Remember your preferences and settings.
- 4. **Targeting Cookies** Deliver relevant advertisements (set only with your consent).
- 5. Social Media Cookies Enable sharing on platforms such as Facebook or X.
- 6. **Pixel Tags & Tracking URLs** Track website visits and navigation patterns.

Managing Cookies

You can control or delete cookies in your browser settings.

For more information, visit www.allaboutcookies.org or www.youronlinechoices.eu.

10. Your Rights

You have the right to:

- Access and obtain a copy of your personal data.
- Correct inaccuracies in your information.
- Request deletion of your data ("right to be forgotten").
- Restrict or object to data processing.
- Withdraw consent at any time.
- Request data portability.

• Lodge a complaint with the **Information Commissioner's Office (ICO)**.

11. Children and Young People

If you are under 18, you must obtain permission from your parent or guardian before providing personal information.

A parent or guardian should be present to assist during this process.

12. Keeping Your Information Accurate

To update or correct your personal data, please contact the office providing your services or email:

□ □ nfo@sherlockuk.com

13. Security Measures

We take appropriate security measures to protect your personal information. Please note that while we strive to safeguard your data, information transmitted over the internet cannot be guaranteed 100% secure.

14. External Links

Our website may contain links to third-party sites.

We are not responsible for their content, privacy policies, or practices.

15. Updates to This Policy

We may update this policy periodically.

Any changes will be posted on this page and, where appropriate, communicated by email. Please check this page regularly for updates.

16. Contact Us

If you have any questions about this Privacy & Cookie Policy or would like to opt out of marketing communications, please contact us at:

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