GREYKEY ESTATES

Privacy Notice

Precision. Integrity. Excellence.

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Greykey Estates - unlocking premium property service with precision and integrity.

Controller and contact details

Greykey Estates Limited is registered in England and Wales under company number 16677849.

Registered name	Greykey Estates Limited
Company number	16677849
Registered office	13 Brearton Street, Bradford, BD1 3ED
Telephone	03301337377
Email	info@greykeyestates.co.uk
Data protection contact	The Managing Director / Compliance Officer, Greykey Estates Limited

About this privacy notice

Greykey Estates Limited is the controller of the personal information described in this privacy notice. This means we decide why and how personal information is used when delivering our estate agency, lettings, property management, valuation, sales progression, tenancy administration, marketing, recruitment, compliance and customer support services.

This notice explains what personal information we collect, why we use it, our lawful bases for doing so, where we obtain information from, who we share it with, how long we keep it, how international transfers are handled and how individuals can exercise their data protection rights.

We only collect and use personal information where it is lawful, fair, relevant and proportionate to the specific purpose. We do not sell personal information.

Contents

1. What information we collect, use and why

The table below summarises the main categories of personal information we may collect and use. We do not collect every item from every person. The information used depends on the service, relationship, instruction, transaction, enquiry or legal requirement involved.

Purpose	Information we may use	Why we use it	Likely lawful bases
Enquiries, valuations and client services	Names, contact details, property addresses, property requirements, communication records, enquiry history, valuation requests, service preferences, appointment records, feedback and service notes.	To respond to enquiries, arrange valuations or viewings, provide estate agency and lettings services, manage client relationships, improve service quality and keep accurate records.	Contract, legitimate interests, consent where required.
Property sales, lettings and property management	Property details, marketing information, viewing records, offers, tenancy or sale records, landlord statements, rent account information, maintenance records, inventories, inspection records, contractor notes, access arrangements and correspondence.	To market properties, manage sales or lettings instructions, progress transactions, administer tenancies, manage repairs, support rent collection, issue statements and deliver property management services.	Contract, legitimate interests, legal obligation.
Identity, right to rent, anti-money laundering and fraud prevention	Identity documents, date of birth, contact details, nationality or right to rent information, sanctions and politically exposed person screening results, source of funds or source of wealth information, transaction records, risk assessments and relevant compliance notes.	To verify identity, comply with anti-money laundering and right to rent duties, prevent fraud, misuse of our services, money laundering, identity misuse and other unlawful activity.	Legal obligation, legitimate interests, contract.
Referencing, affordability and financial checks	Income information, employment details, previous landlord or letting history, credit reference information, guarantor information, bank or payment information and affordability evidence where relevant.	To assess suitability, affordability, credit risk and referencing outcomes for tenancies, guarantor arrangements, sales progression or other property-related services.	Contract, legitimate interests, legal obligation where applicable.

Purpose	Information we may use	Why we use it	Likely lawful bases
Payments, accounts and business administration	Invoices, payment records, bank details, card or transfer details, rent records, landlord statements, supplier records, accounting records, client money records and transaction data.	To administer payments, client money, rent, invoices, statements, accounting, bookkeeping, tax, audit and business records.	Contract, legal obligation, legitimate interests.
Marketing, information updates and website use	Contact details, marketing preferences, property interests, enquiry history, valuation requests, website usage data, IP addresses, cookies or similar technical data where used.	To send relevant property updates, landlord compliance updates, market updates, service information, invitations, valuation opportunities and marketing communications, and to understand website performance.	Consent where required, legitimate interests, contract where relevant.
Queries, complaints, disputes, claims and legal matters	Contact details, correspondence, call notes, complaint records, transaction records, evidence provided by individuals, photographs, witness information, staff or contractor records and relevant internal notes.	To investigate and respond to queries, complaints, disputes or claims, correct mistakes, protect our legal position, support insurance matters and comply with ombudsman, regulatory or legal requirements.	Legitimate interests, legal obligation, contract.
Client welfare, vulnerability and safety	Contact details, emergency contact details, vulnerability information, accessibility requirements, welfare-related concerns, safeguarding concerns, safety risks, serious repair concerns and relevant correspondence.	To respond appropriately to welfare, vulnerability, safety, safeguarding, emergency, access, repair, housing-related or serious risk concerns.	Legitimate interests, legal obligation, vital interests in serious emergencies, consent where appropriate.
Recruitment and workforce planning	Contact details, CVs, covering letters, employment history, qualifications, references, interview notes, right to work information, role preferences, availability and salary expectations.	To assess candidates, manage recruitment, communicate with applicants, make appointment decisions, complete right to work checks and keep appropriate recruitment records.	Contract steps, legal obligation, legitimate interests, consent where required.

2. Special category and criminal offence data

We may process special category information, such as health, wellbeing, vulnerability, accessibility or safeguarding-related information, only where it is relevant, necessary and lawful. This may include situations involving reasonable adjustments, serious repair or housing-related risks, vulnerability, welfare concerns, safeguarding concerns, emergencies, complaints, disputes or legal obligations.

We may process criminal offence or suspected criminal activity information only where it is necessary and lawful, such as anti-money laundering checks, sanctions screening, fraud prevention, tenancy fraud, threats, harassment, anti-social behaviour, unlawful activity, legal claims, regulatory matters or information shared by law enforcement or a court.

Where the law requires an additional condition, safeguarding measure, policy document or other protection for special category or criminal offence data, we will apply that requirement before processing the information.

3. Lawful bases and data protection rights

Under UK data protection law, we must have a lawful basis for collecting and using personal information. The lawful basis depends on the purpose and context of the processing.

Lawful basis	How it may apply to Greykey Estates
Contract	Used where processing is necessary to enter into or perform a contract with a client, customer, supplier, applicant or employee.
Legal obligation	Used where we must process information to comply with law, regulation, accounting, tax, anti-money laundering, right to rent, consumer protection, property, ombudsman or other legal requirements.
Legitimate interests	Used where processing is necessary for a legitimate business, client, safety, compliance, service, fraud prevention, marketing or legal interest, and where those interests are not overridden by the individual rights and freedoms.
Consent	Used for optional activities where consent is required or appropriate, such as certain marketing, non-essential cookies, optional publicity, testimonials or other specific uses.
Vital interests	Used only where processing is necessary to protect someone life, health or safety in a serious or urgent situation.

Your rights

The rights available to you may depend on the lawful basis relied on. You can contact us using the details above to make a data protection rights request. We will respond without undue delay and, in most cases, within one month.

Right	What it means
Right of access	You can ask for a copy of your personal information.
Right to rectification	You can ask us to correct information you believe is inaccurate or incomplete.
Right to erasure	You can ask us to delete your personal information in certain circumstances.
Right to restriction	You can ask us to restrict how we use your information in certain circumstances.
Right to object	You can object to processing based on legitimate interests and to direct marketing.
Right to data portability	You can ask us to transfer certain information you provided to another organisation or to you.
Right to withdraw consent	Where we rely on consent, you can withdraw that consent at any time.

4. Our legitimate interests

Where we rely on legitimate interests, we consider the purpose, necessity and balance between the interest pursued and the rights and freedoms of the individuals involved. Our legitimate interests may include:

- providing, managing, reviewing and improving our estate agency, lettings, property management, valuation, sales progression, tenancy administration and customer support services;
- administering client and customer accounts, instructions, appointments, records, invoices, payments and statements;

- protecting clients, customers, staff, property, business interests and the public from fraud, unlawful activity, misuse of our services, safety risks or harm;
- sending relevant property, market, service and compliance updates where lawful and proportionate, with clear opt-out controls;
- dealing with queries, complaints, disputes, insurance matters, ombudsman matters, legal claims and regulatory enquiries;
- recruiting suitable staff and contractors and maintaining appropriate recruitment records.

We use safeguards including secure systems, restricted access, staff confidentiality, record-keeping, retention controls, suppression lists, clear privacy information and case-by-case assessment before disclosure. Individuals have the right to object where we rely on legitimate interests, although that right may be limited where processing is necessary for legal claims, crime prevention, regulatory compliance or other lawful reasons.

5. Where we get personal information from

We may receive personal information from the following sources where relevant, necessary and lawful:

- directly from individuals, including clients, customers, landlords, vendors, buyers, tenants, applicants, guarantors, occupiers, candidates and authorised representatives;
- from landlords, vendors, buyers, tenants, applicants, guarantors, previous landlords, employers, referees, solicitors, conveyancers, mortgage advisers, lenders, surveyors, valuers, contractors, inventory providers, referencing providers, property portals, auction providers, insurers, professional advisers, accountants and service providers;
- from regulators, ombudsman schemes, local authorities, courts, tribunals, law enforcement agencies, debt recovery providers and other organisations where lawful and relevant;
- from publicly available sources such as Companies House, HM Land Registry, the electoral register where lawfully available, government websites, property data platforms, public records, online property listings, social media platforms and business websites.

6. Who we share information with

We may share personal information with the following categories of recipients where it is necessary, lawful and proportionate:

- landlords, vendors, buyers, tenants, applicants, guarantors, occupiers and authorised representatives;
- solicitors, conveyancers, mortgage advisers, lenders, surveyors, valuers, contractors, inventory providers, referencing providers, identity verification and anti-money laundering providers, credit reference agencies, insurers, accountants, bookkeepers, auditors and professional advisers;
- property portals, auction providers, CRM providers, proptech providers, website, cloud, email, IT, payment, document signing, accounting, marketing and communications providers;

- managing agents, freeholders, block managers, utility providers, local authorities, councils, courts, tribunals, law enforcement agencies, emergency services, regulators, ombudsman schemes and professional bodies;
- debt recovery providers, insurers, professional indemnity providers, previous employers, referees, recruitment agencies and other relevant third parties where necessary and lawful.

We may also share limited information publicly through property listings, our website, social media, brochures, boards, portals or other marketing material where this is necessary to market a property, promote our services or provide property information to the public. We do not share personal information unnecessarily.

Data processors

We use data processors such as estate agency software, CRM, proptech, IT, cloud, email, website, payment, accounting, electronic signature, referencing, anti-money laundering, marketing and property portal providers. These providers process personal information on our behalf to support our services, subject to appropriate contractual, confidentiality and security requirements.

7. Sharing information outside the UK

Greykey Estates Limited does not usually directly transfer personal information outside the UK in the ordinary course of providing local estate agency and lettings services. However, some of our software, cloud, communications, CRM, marketing, analytics, payment, compliance or customer support providers may use approved international sub-processors.

Where personal information is transferred outside the UK, we expect appropriate safeguards to be in place under UK GDPR. These may include UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or another lawful transfer mechanism, depending on the provider and the country involved. Further information about relevant safeguards can be requested using our contact details above.

8. How long we keep information

We keep personal information only for as long as it is necessary for the purpose for which it was collected, including to provide services, manage client relationships, comply with legal and regulatory obligations, respond to queries or complaints, protect our legal position and maintain accurate business records.

Type of information	Typical retention period
Client, landlord, vendor, buyer, tenant, applicant, property, tenancy, sales progression and property management records	Usually up to six years after the end of the instruction, tenancy, transaction, management relationship or last meaningful contact.
Anti-money laundering, identity, sanctions, politically exposed person, source of funds and source of wealth records	Usually five years from the end of the business relationship or completion of the relevant transaction, unless a longer period is required or justified.
Accounting, tax, invoices, rent, landlord statements, client money and payment records	Usually six years from the end of the financial year to which they relate.
Complaints, disputes, claims, ombudsman, insurance, legal and regulatory records	Usually six years after the matter is closed, or longer where the matter remains ongoing.

Type of information	Typical retention period
Enquiry, valuation, applicant and prospective client records	Usually up to two years after the last meaningful contact, unless the individual becomes a client, asks us to keep in touch, opts in to marketing or there is another lawful reason to retain the information.
Marketing suppression records	Kept as long as necessary to respect an opt-out or objection and prevent further unwanted marketing.
Recruitment records for unsuccessful candidates	Usually up to twelve months after the recruitment process ends, unless a longer period is needed for legal, regulatory, dispute or legitimate business reasons.
CCTV, call recordings, access records or other recordings, where used	Kept only for as long as necessary for security, service, training, evidence, complaint, investigation or legal purposes.

Where information is no longer needed, we will securely delete, anonymise or archive it in line with our retention schedule. Retention periods may be extended where necessary to comply with law, respond to a regulator or ombudsman, resolve disputes, establish or defend legal claims, prevent fraud, protect client welfare or deal with an ongoing investigation.

9. Cookies and website information

Our website may use essential cookies and similar technologies to operate properly and securely. Where we use non-essential analytics, marketing or tracking cookies, we will obtain consent where required and provide information through our website cookie controls or cookie notice.

Website information may include IP address, browser and device information, pages visited, enquiry forms submitted and website interaction information. This helps us operate the website, respond to enquiries, improve user experience, measure performance and protect our website from misuse.

10. Automated decision-making

We do not make decisions about individuals based solely on automated processing that produce legal or similarly significant effects. If this changes, we will update this privacy notice and provide the information required by law.

11. Children and other occupants

Our services are not directed at children. However, we may occasionally receive limited information about children or other occupants where this is relevant to a tenancy, property management, welfare, safeguarding, emergency, legal or housing-related matter. We will only use that information where necessary, lawful and proportionate.

12. How to complain

If you have any concerns about our use of your personal information, please contact us first so that we can investigate and respond.

Email	info@greykeyestates.co.uk
Telephone	03301337377
Complaints procedure	https://www.greykeyestates.co.uk/assets/701f2cf9/files/Greykey-Estates-Complaints%20Procedure.pdf

If you remain unhappy after raising your concern with us, you can complain to the Information Commissioner's Office.

ICO address	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
ICO helpline	0303 123 1113
ICO website	https://www.ico.org.uk/make-a-complaint

13. Changes to this privacy notice

We may update this privacy notice from time to time. The latest version will apply from the date stated at the top of the notice. Material changes will be reflected in the version history below where appropriate.

Version	Date	Summary
1.0	28 June 2026	Final publication-ready privacy notice created from ICO generator output, reviewed and refined for Greykey Estates Limited.