

PRIVACY POLICY – SUTHERLAND REAY & CO LTD

Effective Date: March 2026

This Privacy Policy explains how Sutherland Reay & Co Ltd collects, uses, stores and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. Who We Are

Sutherland Reay & Co Ltd

Address: 17-19 Market Street, Chapel-en-le-Frith, High Peak, SK23 0HP

Registered Address: 64 Market Street, New Mills, High Peak, SK22 4AA

Company Number: 07160201

Sutherland Reay & Co Ltd is the Data Controller responsible for personal data collected and processed in connection with its estate agency, lettings and property services operations.

Our trading brands include:

- Sutherland Reay & Co Estate & Lettings
- Fine & Country High Peak, Poynton, Disley & Marple

Data Protection Contact

For questions regarding this Privacy Policy or your personal data, please contact:

sales@sutherlandreay.com

highpeak@fineandcountry.com

2. Licensed Operator Data Processing

Sutherland Reay & Co Ltd operates its estate agency services through licensed operators who may assist in delivering services to clients and applicants.

Mander Real Estate Ltd t/a Fine & Country High Peak, Poynton, Disley & Marple, acts as a licensed operator and Data Processor for certain operational activities. In this role, Mander Real Estate Ltd may access and input personal data within the STREET CRM system used by Sutherland Reay & Co Ltd.

All personal data stored within the STREET CRM system remains under the control of Sutherland Reay & Co Ltd as the Data Controller.

Mander Real Estate Ltd processes personal data only:

- under written licence and instruction from Sutherland Reay & Co Ltd

- for the purpose of delivering estate agency services
- using systems and procedures approved by the Data Controller

Mander Real Estate Ltd does not determine the purposes or lawful bases for processing personal data within the CRM database and does not use this data for its own independent purposes.

All data protection rights requests must be directed to Sutherland Reay & Co Ltd as the Data Controller.

3. What Personal Data We Collect

We collect and process personal data in order to provide estate agency, lettings and property-related services. This may include:

- Identity Data - Name, title, date of birth (where required for Anti-Money Laundering compliance), and contact details such as telephone number and email address.
- Property and Transaction Data - Property details, enquiries, viewing records, offers, tenancy applications, negotiations, property management records, and maintenance requests.
- AML and Compliance Data - Identification documents, proof of address, source of funds information, and results of sanctions or Politically Exposed Person (PEP) screening checks.
- Financial Data - Bank account details used for rental payments, deposits, fees, or property transactions.
- Communication Data - Records of communications between you and our staff, including emails, calls, and CRM notes.
- Technical Data - IP addresses, browser information, and device data collected through our website or CRM systems.

4. How We Collect Personal Data

We may collect personal data through:

- Direct enquiries via telephone, email, website forms or in-branch visits
- Property portal enquiries and marketing platforms
- Property viewings, offers and tenancy applications
- Third-party referrals such as mortgage advisers or solicitor
- CRM systems used to manage property transactions and client relationships

5. Lawful Basis for Processing

We process personal data under the following lawful bases:

- Contract - To provide estate agency, lettings and property management services.
- Legal Obligation - To comply with legal and regulatory requirements, including Anti-Money Laundering regulations.

- Legitimate Interests - To manage property transactions, maintain client relationships, and operate our business effectively.
- Consent - For marketing communications and optional services where consent is required.

6. Marketing and Communications

We may send marketing communications relating to property services, market updates, or properties that may be of interest to you.

Marketing communications will only be sent where:

- you have provided consent, or
- you are an existing client and soft-opt-in rules apply.

You may unsubscribe from marketing communications at any time using the unsubscribe link in our emails or by contacting us directly.

7. Sharing of Personal Data

In order to deliver our services, we may share personal data with trusted third parties including:

- the STREET CRM platform used to manage property transactions and client records
- licensed operators working under the authority of Sutherland Reay & Co Ltd & Mander Real Estate Ltd
- property portals and marketing platforms
- solicitors, conveyancers and mortgage advisers involved in property transactions
- referencing agencies for lettings applications
- contractors or maintenance providers for property management services
- professional advisers including accountants and legal advisers
- regulatory bodies, law enforcement or government authorities where required by law

We do not sell personal data to third parties.

8. International Data Transfers

Where service providers store or process data outside the United Kingdom, appropriate safeguards are implemented to ensure personal data is protected in accordance with UK data protection law.

9. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected or to comply with legal and regulatory requirements.

Typical retention periods include:

- Anti-Money Laundering records – 5 years after the end of the business relationship
- Property sales and lettings transaction records – typically up to 6 years
- Marketing data – until consent is withdrawn or the data becomes inactive

10. Your Rights

Under UK data protection law, you have the right to:

- request access to your personal data
- request correction of inaccurate information
- request deletion of your data where applicable
- restrict or object to certain types of processing
- withdraw consent for marketing communications
- request transfer of your data to another provider where applicable

Sutherland Reay & Co Ltd does not carry out automated decision-making or profiling using personal data.

Requests can be made by contacting:

sales@sutherlandreay.com

highpeak@fineandcountry.com

11. Data Security

We take appropriate technical and organisational measures to protect personal data, including:

- secure password-controlled systems
- controlled access to CRM platforms
- staff training and confidentiality obligations
- monitoring and incident response procedures

12. Complaints

If you are unhappy with how your personal data has been handled, please contact us first so we can investigate and resolve the matter. You also have the right to lodge a complaint with the Information Commissioner's Office.

Website: www.ico.org.uk

Telephone: 0303 123 1113

13. Changes to This Policy

We may update this Privacy Policy from time to time to reflect legal, regulatory or operational changes. The latest version will always be available on request or via our website.