



## Countrywide Group Privacy Notice Employees

The Countrywide privacy notice provides information on how Countrywide and any of its subsidiaries, branches or representative offices and any 3<sup>rd</sup> party providers collect , use , secure, transfer and share your information. Countrywide Group and its affiliates (Countrywide), is a leading provider of Residential development and consultancy practices, Surveying Services, Conveyancing services, Corporate Property Services, Leasehold Estate Management and Auctions. It operates in over 1,200 locations across more than 50 brands, with over 11,000 employees within the UK.

Countrywide has its head office at

7th Floor  
UK House  
180 Oxford Street  
London  
W1D 1NN

It serves most major lenders, investors, house builders, commercial businesses, corporations, local authorities, housing associations and the general public via the following business units / divisions. Full details can be found on our website

<http://www.countrywide.co.uk/about/>

People team	The people team manage recruitment, retention and HR functions
Facilities	The facilities team oversee the management of Countrywide buildings and sites
Fleet	The fleet team managed staff cars and car allowances schemes
Health and Safety	The Health and Safety team oversee the health and safety of all employees
Finance	Finance managed payments, invoices and other related finance functions

Full details of these teams can be found on Our Place

### 1.0. Types of Information Collected.

Typically Countrywide collect:

1. First Name	2. How many Dependants
3. Middle Name	4. Dependants Name
5. Surname	6. Dependants DOB
7. Previous Name	8. Primary ID
9. Date of birth	10. Address ID
11. Present Address	12. Bank details
13. Residential Status	14. Previous employers details
15. Previous Addresses	16. Employee references
17. Nationality	18. Criminal Offences /Convictions
19. Salary	20. Health
21. NI Number	22. Ethnicity
23. UK National	24. Marital status
25. Doctors Details	26. Gender

### 1.1. Methods of Collection

In the general conduct of business, Countrywide collects information relevant to the services being sought across the range of services it offers (listed previously) from:

- yourself
- Employers
- “trusted” sources including:
  - Government / Land / Police registers
  - Credit / Default Agencies
  - Financial Institutes (Banks, Building Societies, Loan Agencies, Credit Card companies)
  - Health providers
  - through consent to third parties disclosing information about you to us that they have collected

Such information will generally be collected directly via the use of any of our standard forms, over the internet, via email, or through a telephone conversation with you. We may also collect personal information through our affiliates or suppliers.

In addition, you may choose to submit information directly to us via several methods, including:

- through Countrywide and affiliates websites
- through social media
- in connection with an actual or potential business or employment relationship with us

You may also agree to third parties disclosing information about you to us that those third parties have collected.

We, our service providers and partners collect certain information by using automated means, such as cookies and web beacons, when you interact with our advertisements, mobile applications, or visit our websites, pages or other digital assets. The information we

collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services on our websites and mobile apps. The analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our websites and apps.

"Your Rights and Choices" section of this Privacy Notice specifies your ability, to opt out or limit the usage of the information collected.

## 1.2. Purposes of Collection

Generally, we will collect, use and hold your information for the purposes of:

- Assessing recruitment applications
  - Managing your employment with Countrywide including
    - Performance management, training, monitoring policy compliance, disciplinary procedures, managing health and safety, processing salary and other payments / transactions including: Accounting, Authorisation, Clearing, Chargebacks, Auditing, Billing, Reconciliation, Collection, Complaints, Enquiries, Credit Checks and related dispute resolution activities
- Protect against and prevent fraud, unauthorised transactions, money laundering (please see below), tax evasion, claims, other liabilities and manage risk exposure and agent /franchise quality, integrity, compliance and security of business processes
- Create and manage any accounts, associated authentication criteria (id's and passwords) you may have with Countrywide
- Provide, administer and communicate with you about Countrywide products, services, offers, programs and promotions, their issuers, acquirers, retailers and partners.
- Compile employee directories, including employee contact information
- Operate, monitor, evaluate and improve, websites, mobile applications, other digital assets and business.
  - Developing new products and services
  - Managing communications, assess effectiveness and optimisation of advertising
  - Functionality of our websites, mobile applications other digital assets
- Evaluate your interest in employment and contact you regarding possible employment opportunities
- Enforce Countrywide "Terms of Use", other legal rights as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over Countrywide or its affiliates.
- Comply with industry standards and Countrywide policies

## 1.3. Lawful basis of processing

Countrywide processes your information under the following

- Performance of a contract: where you enter into a contract with Countrywide and we need to process your information as part of this contract
- Legitimate interests: some information is processed by Countrywide as part of its legitimate interests which include :Fraud, risk assessment, due diligence, network

and information security, suppressions and managing opting out of communications , profiling , direct marketing, monitoring, web analytics, cloud storage, acquisitions, updating customer details, and other core products and service provided by the data controller

- Public interest: some information is processed in accordance public interest such as health and safety
- Consent : where we process information under consent we will seek you clear and unambiguous consent prior to processing your data

## 2. Information We Share

We do not sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- Formally contracted service providers to perform services on our behalf:
  - Hosting Datacentres, Infrastructure, Applications (Development / Support) , Cloud Services (Software as a Service – SaaS, Platform as a Service – PaaS , Infrastructure as a Service – IaaS)
  - Helpdesk, Call Centres etc.

We contractually require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements

- Councils, health and care providers
- Other Law firms
- Credit agencies, Her Majesty's Revenue and Customs (HMRC and other relevant regulatory bodies
- Additionally we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities.
- Perspective employers requesting references via your written consent

On websites, features can be accessed where we partner with other entities that are not affiliated with Countrywide. These include social networking, geo-location tools etc. are operated by third parties (indicated appropriately) who may use or share personal information in accordance with their own privacy policies. It is recommended that you review the third parties' privacy policies if you use the relevant features.

Countrywide reserve the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets, with reasonable efforts for the acquirer protect / use your information consistent with our Global Privacy Notice. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.

## 2.1 How long do we keep information for

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep your information for as long as necessary. We generally keep personal information for 20 years after last contact with you. However Countrywide reserves the right to keep information for longer if we feel that this is in the legitimate interests of Countrywide.

## 2.2 International Data Transfers

Countrywide may transfer the personal information collected about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Privacy Notice or as otherwise disclosed to you at the time the data is collected (e.g. via program specific privacy notice).

We currently engage a company called WNS who are based in India. We have ensured that WNS meet the required privacy and security requirements through our contract with WNS. You can find out more about WNS here <http://www.wns.com/>

## 2.3 Profiling

For the purposes of business conduct, enhancement, identification of fraud, money laundering and other potential un-authorized activities, Countrywide engages profiling activities via direct use or anonymisation of sensitive personal information.

### 2.3.1 Indirect Profiling

Direct profiling is engaged for the fair and lawful purposes, to provide Countrywide the ability to enforce Countrywide "Terms of Use", legal reporting as may be required by applicable laws, regulations, policies / standards or requested by any judicial process or governmental agency having or claiming jurisdiction over Countrywide or its affiliates; including, but not limited to:

- Benchmarking employees: appraisals, performance, bonus payments, disciplinary actions, improvement plans, promotions and awards.
- Background checks for existing and new employees, clients, business partners, affiliates
- Financial Viability analysis / reports
- Business partner / client portfolio position, performance, risk positions
- Anti-money laundering
- Tax reporting
- Credit defaulting / exposure

### 2.3.2 Indirect Profiling

Indirect profiling via anonymisation of personal information is also used for preparing and furnishing aggregated data reports showing anonymised information, including, but not limited to, the following:

- Compilations, analyses, analytical and predictive models and rules, and other aggregated reports for the purpose of advising our partners / affiliates and servicing

institutions, retailers and other customers regarding past and potential future patterns of service usage, spending, fraud, and other insights that may be extracted from this data.

- Compiling and communicating promotional and marketing information about products and services that Countrywide Group, affiliates and other organisations that we have affiliations with have and that may be of interest to you.
- Conducting market research
- Facilitating our internal business operations, including the fulfilment of any legal requirements.

## 2.4 Your Rights and Choices

Your rights regarding the sensitive / personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information, and how we communicate with you.

## 2.5 Access and Correction

You may have the right to:

- obtain confirmation that we hold personal information about you
- request access to and receive information about the personal information we maintain about you
- receive copies of the personal information we maintain about you

The right to access personal information may be limited in some circumstances by local law requirements.

To exercise these rights, please contact us as set forth below.

You can submit a request by using the following form [Subject Access Request Form](#). If you have problems using this form please use the contact details below.

## 2.6 Update and correct inaccuracies in your personal information

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to information we hold about you:

## 2.7 Object to the processing of your personal information

If you would like to object to any processing of your information by Countrywide you can contact us outlining what processing of information you would like to object to.

## 2.8 Have the information blocked, anonymised or deleted.

If you would like countrywide to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like deleted , blocked or anonymised.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us as specified in the “How To Contact Us” section below.

## 2.9 Opting out of processing

You can opt out collection of personal information by automated means e.g. when visiting our website or visit third-party websites and interact with our adverts, by using the Cookie Consent tool displayed in the website (the browser you use may provide options on how to opt out of receiving certain types of cookies). However without cookies you may not be able to use all of the website features and/or online services.

Countrywide operate a cookie policy < content here>? Some of our service providers and partners may collect information about your online activities over time and across third-party websites to customise and target our adverts.

You can at any time tell us not to send you marketing communications by

- e-mail [privacy@countrywide.co.uk](mailto:privacy@countrywide.co.uk)
- unsubscribing via the “unsubscribe link” within the marketing e-mails you receive from us, or
- contacting Countrywide as indicated below.

## 2.10 Withdrawal of consent

If we obtain your information by consent you have the right to withdraw any consent you previously provided to us.

If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information.

**Countrywide we will apply your preferences going forward.** Doing so will mean that you cannot take advantage of certain Countrywide and affiliate products, services and promotions.

The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.

## 3. How to Contact Us / Complaints and Feedback

If you:

- make a complaint about a breach of your personal information, applicable privacy laws / principles or a concern about Countrywide privacy practices
- would like access and/or update information or preferences you provided to us,
- please click here <link to form>.

You also may e-mail us at:

privacy@countrywide.co.uk

Or write to us at:

John Sheehan Group Data Protection Officer  
Countrywide House  
88-103 Caldecotte Lake Drive  
Caldecotte Lake Business Park  
Caldecotte  
Milton Keynes  
MK7 8JT

If we fall short of your expectations in processing your personal information or you wish to make a complaint about our privacy practices, please contact us via the details in the "How To Contact Us" section below.

To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time.

If we cannot for lawful reasons complete your request we will explain this to you to the extent that we lawfully can.

### [3.1 How We Protect Personal Information](#)

The security of your personal information is very important and Countrywide is committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

We use SSL encryption on a number of our websites from which we transfer certain personal information.

Countrywide stores personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information was collected, unless otherwise required or authorised by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

### [4. Updating this privacy statement](#)



We will update this statement from time to time so we suggest that you review this statement at regular intervals. Where we undergo substantial changes to our privacy statement we will endeavour to inform you directly about these changes.

March 2018