PRIVACY POLICY

LJB Estates Sales and Lettings Ltd

Effective date: 1 May 2026 | Legislative review: 30 October 2026 | Version 1.0

Coventry, United Kingdom • 0330 043 6966 • info@ljbestatesltd.com

1. Who we are and scope

LJB Estates Sales and Lettings Ltd ('LJB', 'we', 'us') is the data controller for personal information processed in connection with estate agency, sales, lettings, property management, valuations, landlord instructions, applicant enquiries and associated services, except where another party determines the purposes and means of processing. Privacy enquiries: info@ljbestatesltd.com; telephone 0330 043 6966. Registered office, company registration number and ICO registration number: [VERIFY AND INSERT]. If a data protection officer has been formally appointed, add their contact details here. This notice applies to prospective and current buyers, sellers, tenants, landlords, guarantors, occupiers, contractors, website visitors and other business contacts. Separate employee and job-applicant notices may be required.

2. What personal information we collect

We may collect names, addresses, contact details, date of birth, signatures, identity and nationality evidence, immigration/Right to Rent evidence, property ownership details, tenancy and transaction history, property photographs and inspection records, correspondence, viewing preferences, employment and income details, affordability and referencing information, bank/payment information, guarantor details, complaints, call or electronic communications records, and website/device information. We may process information about household members where necessary. Sensitive information (such as disability or health-related accommodation needs) is collected only where justified, with an applicable Article 9 condition. Criminal offence data is processed only where permitted under Article 10 and the Data Protection Act 2018.

3. Sources of information

Information comes from you, landlords, sellers, joint applicants, guarantors, referees, employers, referencing agencies, credit reference agencies, conveyancers, solicitors, mortgage intermediaries, contractors, public registers such as HM Land Registry and Companies House, property portals and relevant government checking services. When we obtain information indirectly, we provide privacy information within the legally required timeframe unless a lawful exception applies.

4. Purposes and lawful bases

Property enquiries, viewings, offers and pre-contract steps: Article 6(1)(b), where applicable, or Article 6(1)(f) for legitimate business interests in responding to enquiries. Agency agreements, tenancy administration, rent collection and property management: Article 6(1)(b) where the individual is a contracting party; otherwise Article 6(1)(f), including landlords' and LJB's interests in managing property and transactions. Identity, Right to Rent, tax and applicable anti-money-laundering compliance: Article 6(1)(c) where legal duties apply. Fraud prevention, safety, debt recovery, dispute management, recordkeeping and service improvement: Article 6(1)(f) where proportionate, or Article 6(1)(c) when required by law. Optional marketing: consent under Article 6(1)(a) where PECR requires it, or legitimate interests where marketing is otherwise lawful. We assess necessity, fairness and individual rights before relying on legitimate interests. The recognised legitimate interests basis introduced by the 2025 Act is used only where a specific statutory purpose and conditions apply, not as a blanket basis.

5. Identity, anti-money laundering and Right to Rent

Where LJB is subject to anti-money laundering supervision for relevant estate agency or letting agency activity, we conduct legally required customer due diligence, beneficial ownership checks, sanctions screening and suspicious activity reporting. We may share relevant information with HMRC, law enforcement or the National Crime Agency where lawfully required or permitted. Right to Rent checks are carried out where applicable under immigration legislation and Home Office rules, with evidence retained for the statutory period. We will not use identity or immigration information for unrelated purposes.

6. Referencing, affordability and credit checks

For tenancy applications we may verify identity, income, employment, rental history, affordability and guarantor suitability, using specialist referencing providers. Credit searches may leave a footprint depending on the provider and search type; the provider's notice should explain this. We identify the provider and its privacy terms at the point of referral. A decision involving a reference result is not necessarily a solely automated decision; where solely automated significant decisions are used, section 11 applies.

7. Sharing and recipients

Where necessary and lawful we share relevant data with landlords, sellers, prospective counterparties, conveyancers, solicitors, referencing and credit agencies, deposit protection schemes, payment providers, banks, insurers, inventory clerks, surveyors, maintenance contractors, property portals, IT/cloud providers, regulators, government agencies, courts and professional advisers. We limit disclosures to what is necessary and use processor agreements where required. We do not sell personal information to third-party data brokers.

8. Marketing and cookies

Electronic marketing is sent in accordance with PECR and UK GDPR. Where consent is needed, it is freely given, specific and withdrawable. Existing-customer marketing may be sent under the soft opt-in only where every legal condition is satisfied, including a clear opt-out when details are collected and in each message. You can object to direct marketing at any time by contacting us or using an unsubscribe link. Our website, if applicable, must display a separate accurate cookie notice and consent controls for non-exempt cookies. The 2025 Act introduced limited exceptions for certain cookies; these do not remove transparency obligations.

9. Retention

We keep data only for as long as needed for the stated purpose, legal duties, disputes and defensible retention schedules. Typical working criteria: enquiries not progressing to a transaction are reviewed periodically and deleted when no longer needed; contracts, accounting and transaction files are generally assessed against applicable tax and civil limitation periods, commonly up to six years after the relevant relationship or transaction, unless longer retention is justified. Where the Money Laundering Regulations apply, relevant due diligence records are generally retained for five years after the business relationship ends or the occasional transaction completes, subject to statutory exceptions. Right to Rent evidence is generally kept throughout the tenancy and for one year after it ends, where required. Exact retention periods must be approved in LJB's internal retention schedule and may differ by record type.

10. Security and international transfers

We use proportionate technical and organisational controls including access restrictions, authentication, staff confidentiality, secure disposal, backups and supplier oversight. No system is entirely risk-free. Where personal information is transferred outside the UK, we rely on a UK adequacy regulation, appropriate safeguards such as the UK International Data Transfer Agreement

or UK Addendum, or a valid exception, and assess transfer risks where required. Contact us for details of applicable safeguards.

11. Automated decisions and profiling

LJB should confirm whether it uses any solely automated decision producing legal or similarly significant effects. [VERIFY: insert actual practice and, if used, the decision logic, significance, consequences, and safeguards.] Where applicable, individuals can make representations, contest the decision and obtain human intervention in accordance with the UK GDPR as amended by the Data (Use and Access) Act 2025.

12. Your data protection rights

Subject to applicable conditions and exemptions, you may request access, correction, erasure, restriction, portability, and object to processing, including processing based on legitimate interests. You can withdraw consent at any time without affecting prior lawful processing. We ordinarily respond to valid rights requests within one month, subject to lawful extensions and the statutory ‘stop the clock’ rules where clarification is reasonably required. We may need to verify identity. There is normally no fee, except where legislation permits one.

13. Your absolute right to object to direct marketing

You have the right to object at any time to processing of your personal data for direct marketing, including associated profiling. If you object, we will stop processing your data for direct marketing purposes. Email info@ljbestatesltd.com with ‘Marketing objection’ in the subject line.

14. Complaints

Please contact info@ljbestatesltd.com to raise a data protection complaint. We will acknowledge, investigate and explain our outcome in accordance with applicable legal requirements, including the complaints provisions introduced by the Data (Use and Access) Act 2025. You may also complain to the Information Commissioner's Office (ICO): www.ico.org.uk; 0303 123 1113; Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. You may seek a judicial remedy where available.

15. Changes to this policy

We review this notice regularly and when processing or legislation changes. Material changes will be brought to affected individuals' attention as appropriate. The effective date is 1 May 2026; this edition was reviewed on 30 October 2026 to reflect legislation and guidance that came into force after May 2026. This does not claim that those later provisions applied retrospectively.

16. Publication checks before adoption

Confirm registered office, Companies House number and ICO registration; approved logo; actual referencing agencies, deposit scheme, website/cookie vendors, overseas processors, AML supervisory position, specific retention schedule, data protection contact and whether solely

automated decisions occur. Confirm how complaints are submitted electronically. Obtain UK legal/data-protection review before publishing as the company's operative notice.

17. Primary legal and regulatory references

UK GDPR Articles 5–6, 9–10, 12–22 and 44–49; Data Protection Act 2018; Data (Use and Access) Act 2025; Privacy and Electronic Communications (EC Directive) Regulations 2003; Money Laundering Regulations 2017 (as amended); Immigration Act 2014 and relevant Right to Rent regulations and guidance. ICO: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/the-right-to-be-informed/what-privacy-information-should-we-provide/ ; https://ico.org.uk/about-the-ico/what-we-do/legislation-we-cover/data-use-and-access-act-2025/the-data-use-and-access-act-2025-what-does-it-mean-for-organisations/ ; GOV.UK: https://www.gov.uk/guidance/data-use-and-access-act-2025-data-protection-and-privacy-changes