SPENCER JAMES

Estate Agents — East London

PRIVACY NOTICE

How we collect, use, and protect your personal information — UK GDPR compliant

Data controller	Spencer James Residential Limited
Company number	04370219
Registered address	8a Hartlepool Court, London, E16 2RL
ICO registration number	Z1109175
Data Protection Officer	James Bisset
Contact	mail@spencer-james.co.uk
Last updated	September 2026

1. Who we are

Spencer James Residential Limited ("Spencer James", "we", "us") is a residential estate agency operating in East London. We are registered as a data controller with the Information Commissioner's Office (ICO) under registration number Z1109175.

This Privacy Notice explains how we collect and use your personal information when you use our services — whether as a buyer, seller, landlord, or tenant. Please read it carefully. If you have any questions, contact James Bisset at mail@spencer-james.co.uk.

2. What personal information we collect

Who you are	Information we collect
Buyers	Name, address, contact details, proof of identity (passport or driving licence), proof of address, source of funds documentation, financial position, mortgage offer details, property preferences
Sellers / vendors	Name, address, contact details, proof of identity, proof of ownership, property details (title, EPC, planning history)
Landlords	Name, address, contact details, proof of identity, proof of ownership, bank details (for rental payments), property details
Tenants	Name, address, contact details, proof of identity, right to rent documentation, employment details, income information, references, credit check data, bank details
Prospective tenants	Name, contact details, income information, property requirements
General enquiries	Name, email address, phone number, property interest or enquiry content

We may also receive information about you from third parties, including referencing agencies, credit check providers, HM Land Registry, and property portals where you have made an enquiry.

3. Why we use your information and our legal basis

The UK GDPR requires us to have a legal basis for processing your personal information. The table below explains why we use your data and the legal basis we rely on for each purpose.

Purpose	Why we need it	Legal basis
Providing estate agency services	To carry out your sales, lettings, or property management instruction — including marketing your property, conducting viewings, and progressing transactions.	*Performance of a contract (Art.6(1)(b) UK GDPR)*
Identity verification (AML)	We are legally required to verify the identity and source of funds of buyers and sellers under the Money Laundering Regulations 2017. We cannot proceed with a transaction without completing these checks.	*Legal obligation (Art.6(1)(c) UK GDPR / MLR 2017)*
Tenant referencing	To assess your suitability as a tenant on behalf of the landlord, including credit checks, employment verification, and references.	*Performance of a contract (Art.6(1)(b))*
Right to Rent checks	To verify your right to rent in the UK as required by the Immigration Act 2014. We must see and record your documents before a tenancy can begin.	*Legal obligation (Art.6(1)(c))*
Communications and administration	To respond to your enquiries, update you on your transaction, and manage our relationship with you.	*Performance of a contract / Legitimate interests (Art.6(1)(f))*
Property alerts and market updates	To send you information about properties or market updates that may interest you as an existing or former client.	*Legitimate interests (soft opt-in under PECR) — you can opt out at any time*
Legal claims and dispute resolution	To retain records necessary to defend or pursue legal claims, including transaction correspondence, tenancy records, and deposit dispute evidence.	*Legitimate interests (Art.6(1)(f)) / Legal obligation*
Improving our services	To analyse how our services are used and improve them. Website analytics are conducted on an anonymised basis.	*Legitimate interests (Art.6(1)(f)) — anonymised data only*

4. Who we share your information with

We share your personal information only where necessary and with appropriate safeguards in place. The main categories of recipient are:

Recipient	Why	Safeguard
Conveyancing solicitors	To progress your property purchase, sale, or letting transaction.	*Disclosed in terms of business; necessary for contract*
Rightmove, Zoopla, and other property portals	To market your property to potential buyers or tenants.	*Portal terms of service; disclosed at instruction*
Referencing agencies (e.g. Homelet)	To carry out tenant referencing on behalf of landlords.	*Data processing agreement in place*
The Deposit Protection Service (DPS)	To register and protect tenancy deposits as legally required.	*Statutory requirement; scheme terms*

Compliance Assist and Hipla	To carry out AML identity screening and PEP/sanctions checks.	*Data processing agreement; legal obligation*
HM Revenue & Customs / NCA	Where required by law, including AML reporting obligations.	*Statutory / legal obligation — no consent required*
Utility providers and local councils	To notify them of a change of occupier at the start or end of a tenancy.	*Legitimate interests; standard industry practice*
Microsoft (Microsoft 365, including Outlook and OneDrive)	Our email, file storage and document management platform.	*Data processing agreement; data held in Microsoft UK data centres [confirm]; any transfer outside the UK covered by UK-approved safeguards*
Buyers, sellers, landlords, tenants and their representatives	To negotiate and progress your transaction, for example passing offers, memoranda of sale and tenancy information.	*Necessary for contract; limited to what the transaction needs*
Sub-agents and other estate or letting agents	To market your property where you have agreed to sub-agency, or to deal with another agent in a chain.	*Disclosed in terms of business*
The Property Ombudsman	To respond to a complaint referred to the Ombudsman, as our membership requires.	*Legal obligation / legitimate interests*
Our insurers and professional advisers	To notify and defend claims, and to take legal or accounting advice.	*Confidentiality obligations; legitimate interests*
Contractors and maintenance providers (including Fix-Flo)	To arrange repairs, inspections and safety certificates on managed properties.	*Contract / legitimate interests; access limited to what the job needs*
Rent guarantee and legal expenses insurers (FCC Paragon, Rightmove / LPG)	To set up and claim on rent guarantee and legal expenses policies for landlords.	*Necessary for contract; insurer terms*
MRI Software	Our sales, lettings and property management system.	*Data processing agreement*

We do not sell your personal data to third parties. We do not share your data for marketing purposes with any third party.

5. How long we keep your information

We keep your personal information only for as long as necessary. The table below shows our standard retention periods. Full details are in our Data Retention Schedule.

Type of data	Retention period	Reason
Sales transaction data (excluding AML records)	6 years from completion	*Limitation Act 1980 (contract and negligence claims)*
AML records (identity documents, source of funds evidence, screening results)	5 years from completion or the end of our relationship, then deleted	*MLR 2017, Regulation 40*
Lettings and tenancy records	6 years from end of tenancy	*Limitation Act 1980; potential deposit or tenancy disputes*
Right to Rent documents	2 years after tenancy ends	*Immigration Act 2014 — statutory minimum*

Property management records	6 years from end of management	*Limitation Act 1980*
Unsuccessful tenancy applications	12 months	*Legitimate interests — potential re-application*
General enquiries (no instruction)	12 months	*Legitimate interests*
Marketing communications	Until you opt out, then removed within 30 days	*PECR; opt-out honoured permanently*

6. Your rights

Under the UK GDPR you have the following rights in relation to your personal data. To exercise any of these rights, contact James Bisset at mail@spencer-james.co.uk. We will respond within one calendar month.

Right	What it means
Right to be informed	To know how your data is being used. This Privacy Notice fulfils that obligation.
Right of access	To request a copy of all personal data we hold about you (a Subject Access Request). Free of charge for standard requests.
Right to rectification	To require us to correct any inaccurate or incomplete data. We will act within one month.
Right to erasure	To request deletion of your data where it is no longer needed, where you withdraw consent, or where processing is unlawful. Note: we cannot delete AML records during the 5-year retention period required by the Money Laundering Regulations 2017.
Right to restrict processing	To ask us to pause processing of your data while we resolve a dispute about accuracy or an objection.
Right to data portability	To receive your data in a structured, machine-readable format where processing is based on your consent or a contract.
Right to object	To object to processing based on our legitimate interests. We will stop unless we have compelling grounds that override your interests. You can opt out of marketing at any time and we will always honour this.
Right to withdraw consent	Where we rely on your consent, you can withdraw it at any time. This will not affect processing already carried out.
Right to complain to the ICO	If you are unhappy with how we handle your data, you have the right to complain to the Information Commissioner's Office at www.ico.org.uk or by calling 0303 123 1113.

7. Security

We take the security of your personal information seriously. We use password-protected systems, restrict access to personal data to staff who need it, and require all staff handling personal data to be trained in data protection. Paper records are stored securely and shredded when no longer needed.

Despite these measures, no electronic transmission or storage system is completely secure. If you have reason to believe your personal data has been compromised, please contact us immediately at mail@spencer-james.co.uk.

8. Cookies and Website

Our website uses cookies to improve your browsing experience. We will only place non-essential cookies with your consent. You can change your cookie preferences at any time through the cookie settings on our website. Withdrawing consent will not affect cookies already placed. We collect anonymised analytics data to understand how our website is used — this does not identify you personally.

9. Changes to this Privacy Notice

We may update this Privacy Notice from time to time. The current version is always available on our website and on request from our office. We will notify you of any material changes where we hold your contact details.

10. How to contact us

For any questions about this Privacy Notice, to exercise your rights, or to make a complaint about how we handle your data, please contact:

Name	James Bisset — Data Protection Officer
Email	mail@spencer-james.co.uk
Post	8a Hartlepool Court, London, E16 2RL

How we handle data protection complaints. If you are unhappy with how we have used or protected your personal data, please contact James Bisset (Data Protection Officer) at mail@spencer-james.co.uk or at 8a Hartlepool Court, London, E16 2RL. We will acknowledge your complaint within 30 days of receiving it, investigate it, keep you informed of progress, and tell you the outcome without undue delay. This process is separate from our general Complaints Procedure and does not affect your right to complain to the ICO.

You also have the right to complain to the ICO at any time:

ICO website	www.ico.org.uk
ICO helpline	0303 123 1113
ICO post	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF