

SPI

SURVEYORS

Privacy & Cookies Policy

SPI Surveyors Ltd | Company No. 15205127

RICS Regulated | England & Wales

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PRIVACY & COOKIES POLICY

Privacy & Cookies Policy

SPI Surveyors Ltd is committed to protecting and respecting your privacy. This Policy explains how we collect, use, store and share your personal data, and your rights in relation to it. Please read it carefully.

1. Introduction & Data Controller

The data controller responsible for your personal data is **SPI Surveyors Ltd**, Company Registration No. 15205127, trading address: First Floor, Swan Buildings, 20 Swan Street, Manchester, M4 5JW.

SPI Surveyors Ltd is committed to complying with the UK General Data Protection Regulation (UK GDPR) as retained by the European Union (Withdrawal) Act 2018, the Data Protection Act 2018 (DPA 2018), and any successor legislation.

This Privacy Policy forms part of SPI Surveyors Ltd's obligation to be open and fair with all individuals whose personal data we process. It covers all processing carried out by SPI Surveyors Ltd across all lines of business.

2. Personal Data We Collect

We may collect and process the following categories of personal data:

- **Identity Data:** first name, last name, title, date of birth (where required for identity verification).
- **Contact Data:** postal address, email address, telephone numbers.
- **Property Data:** address and details of the subject property.
- **Financial Data:** transaction records and payment references. Card details are not stored — processed by Stripe (PCI-DSS compliant).
- **Documentary Data:** copies of identification documents where required for anti-money laundering checks.
- **Technical Data:** IP address, browser type, time zone, operating system.
- **Usage Data:** how you use our website, products and services.
- **Communications Data:** records of correspondence by email, telephone, post or enquiry form.
- **Marketing & Preference Data:** preferences regarding marketing and communications.

We collect this data through our website, booking forms, telephone calls, email correspondence, and through third-party introduction channels such as property marketplaces (e.g. HomeMove), financial advisers, estate agents, and comparison websites. Before disclosing personal data of another individual to us, you must obtain that person's consent.

3. Legal Basis for Processing

We only process your personal data where we have a lawful basis:

- **Performance of a contract (Article 6(1)(b) UK GDPR):** processing necessary to perform the services you have engaged us to provide, or to take steps at your request prior to entering into a contract.
- **Compliance with a legal obligation (Article 6(1)(c) UK GDPR):** anti-money laundering checks, RICS regulatory obligations, tax and accounting requirements.
- **Legitimate interests (Article 6(1)(f) UK GDPR):** fraud prevention, business administration, service improvement, and direct marketing to existing clients, where your interests and rights do not override ours.

- **Consent (Article 6(1)(a) UK GDPR):** where you have given clear, specific consent (e.g. subscribing to marketing). You may withdraw consent at any time without affecting the lawfulness of prior processing.

4. How We Use Your Personal Data

We use your personal data for the following purposes:

- To fulfil our contractual obligations: scheduling surveys, preparing reports, issuing invoices, and communicating about your instruction.
- To make and manage payments and collect any outstanding debts.
- To manage your client portal account and provide access to your Reports.
- To communicate with estate agents, vendors, landlords or their agents to arrange property access.
- To comply with RICS regulatory and legal obligations.
- To verify your identity and carry out anti-money laundering and fraud prevention checks.
- To respond to and manage complaints and disputes.
- To improve our website, services and operations.
- To send marketing communications where we have consent or a legitimate interest to do so.
- To maintain records, accounts and meet our audit obligations.

5. Sharing & Disclosing Personal Data

We do not sell, rent or trade your personal data to any third party. We may share it with:

- **Service providers and sub-contractors** acting as data processors on our behalf, including IT and cloud storage providers, payment processors (Stripe), email providers, and specialist sub-contracted surveyors for add-on services.
- **Introducers and marketplace partners** where your instruction originated through such a channel, to the extent necessary to fulfil the engagement.
- **Estate agents, vendors and landlords** to the extent necessary to arrange property access.
- **Fraud prevention agencies and credit reference agencies** for identity verification, fraud prevention and anti-money laundering.
- **Regulators, authorities and courts** where required by applicable law or regulation, including RICS Regulation.
- **Professional advisers** including solicitors, accountants and insurers.
- **Successor businesses** in the event of a merger, acquisition or sale of the business.

Where we share data with third-party processors, we ensure appropriate contractual safeguards are in place, including Data Processing Agreements where required by UK GDPR. We will not, without your consent, disclose or supply your personal data to any third party for their direct marketing purposes.

6. Data Retention

We retain personal data only for as long as is necessary. Our standard retention periods:

- **Client records and survey/valuation Reports:** 6 years from the date of the Report, in accordance with the Limitation Act 1980.
- **Financial and payment records:** 7 years from the transaction date, per HMRC requirements.
- **RICS professional records:** in accordance with minimum periods required by RICS.
- **Marketing data:** until consent is withdrawn or an objection is received, after which data will be suppressed or deleted.

- **Website enquiry data:** 12 months from the date of enquiry, unless a contract was subsequently formed.

Following expiry of the applicable retention period, personal data will be securely deleted or anonymised.

7. Data Security

We have implemented appropriate technical and organisational measures to protect your personal data against accidental loss, unauthorised access, use, alteration or disclosure, including:

- Secure encrypted storage on cloud-hosted servers with relevant access and firewall controls.
- Role-based access controls ensuring data is accessible only to those who need it.
- Secure password policies and multi-factor authentication for internal systems.
- Regular review of our security practices and procedures.
- Use of Stripe (PCI-DSS compliant) so that card details are never stored on our systems.
- Secure disposal of paper records via shredding or contracted third-party disposal.

No data transmission over the internet can be guaranteed completely secure. Personal data sent by email may be insecure in transit. Once received, we use strict procedures to prevent unauthorised access. Where you use a password to access our portal, this must be kept confidential. We will never ask you for your password.

8. Your Rights Under UK GDPR

You have the following rights in relation to your personal data, subject to certain exceptions set out in UK GDPR:

- **Right to be informed** — about how we collect and use your personal data (this Policy fulfils that obligation).
- **Right of access** — to request a copy of personal data we hold about you (Subject Access Request).
- **Right to rectification** — to ask us to correct inaccurate or incomplete personal data.
- **Right to erasure** (“right to be forgotten”) — to ask us to delete personal data in certain circumstances.
- **Right to restrict processing** — to restrict how we process your data in certain circumstances.
- **Right to data portability** — to request transfer of your data to another provider in certain circumstances.
- **Right to object** — to processing based on legitimate interests and to direct marketing.
- **Rights related to automated decision-making** — not to be subject to a solely automated decision that significantly affects you.

To exercise any of these rights, please contact us in writing at info@spi-surveyors.com. We will respond within one calendar month of receipt. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at any time: www.ico.org.uk, Tel: 0303 123 1113.

9. International Transfers

We aim to store and process all personal data within the UK or the European Economic Area (EEA). Where personal data is transferred outside the UK or EEA by any third-party service provider (e.g. certain cloud providers), we ensure appropriate safeguards are in place, such as Standard Contractual Clauses approved by the Information Commissioner's Office.

10. Cookies Policy

Our website uses cookies — small text files placed on your device — to distinguish you from other users, remember your preferences, and improve your experience.

- **Strictly necessary cookies:** essential for the operation of our website (e.g. booking form, client portal, payment functionality). These cannot be disabled.

- **Analytical/performance cookies:** allow us to count visitors and understand how they use our site. We use Google Analytics (Google, Inc.). Information is aggregated and anonymised. You may opt out via the Google Analytics Opt-out Browser Add-on.
- **Functionality cookies:** enable us to personalise content and remember preferences.

You may control and delete cookies via your browser settings. Disabling cookies may affect website functionality. By continuing to browse without adjusting your cookie settings, you consent to our use of cookies in accordance with this Policy. Note that some cookies may be placed by third-party service providers who perform services on our behalf.

11. Updates to This Policy

We may update this Policy from time to time to reflect changes in our practices, data protection law, or our business operations. Any changes will be published on our website at spi-surveyors.com with an updated effective date. Where changes are material, we will take reasonable steps to notify you.

12. Contact & DPO Details

For questions about this Policy, to exercise your data protection rights, or to raise a concern about how we handle your personal data, please contact us:

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