



PRIVACY NOTICE

How we collect and use your personal data

Document Control

Document title	Privacy Notice
Company	Hughes and Associates Property Services Ltd
Owner	Data Protection Officer
Version	1.0
Status	Approved
Last updated	08/06/2026
Next review date	01/06/2027
Classification	Public

Contents

1. About this notice and who we are	1
2. The personal data we collect.....	1
3. How we collect your data.....	1
4. Why we use your data, and our lawful basis.....	1
5. Marketing	2
6. Who we share your data with	2
7. Sending data outside the UK.....	2
8. How long we keep your data	3
9. How we protect your data	3
10. Your rights.....	3
11. Cookies	3
12. How to contact us or complain	3

1. About this notice and who we are

This privacy notice explains how Hughes and Associates Property Services Ltd (“we”, “us” or “our”) collects, uses and protects your personal data, and the rights you have. We are a property services business, and we are the “controller” responsible for your personal data.

Company	Hughes and Associates Property Services Ltd
Registered office	105 Carrow Road, Cedar House, Norwich, NR1 1HP
Website	hughesandassociates.co.uk
Telephone	0333 335 5330
Data Protection Officer	IT Manager, info@hapsltd.co.uk
ICO registration number	ZA348549

We may update this notice from time to time; the latest version is always the one published by us. This notice was last updated on 08/06/2026.

2. The personal data we collect

Depending on your relationship with us (for example as a client, tenant, landlord, buyer, seller, supplier or website visitor), we may collect the following kinds of personal data:

Category	Examples
Identity data	Title, Name.
Contact data	Email address and telephone numbers(Optional).
Verification data	Supporting documents, where these apply.
Correspondence data	Records of your contact with us, including emails, letters, calls and messages.
Technical data	When you use our website: IP address, device and browser information, and data collected through cookies.

3. How we collect your data

- directly from you, when you contact us, instruct us, register an interest, or use our services or website;
- from third parties, such as referencing property portals and introducers; and
- automatically, through cookies and similar technologies when you use our website (see Section 11).

4. Why we use your data, and our lawful basis

We only use your personal data where the law allows. The main purposes and lawful bases are:

What we use it for	Lawful basis
Providing our property services and managing our relationship with you	Performance of a contract; legitimate interests
Carrying out referencing, identity	Performance of a contract
Taking payments and keeping accounting and tax records	Legal obligation; performance of a contract
Keeping our systems and premises secure and preventing fraud	Legitimate interests; legal obligation
Sending you marketing about our services	Consent, or our legitimate interests where the “soft opt in” applies
Responding to your requests and to complaints, and meeting our legal duties	Legitimate interests; legal obligation

Where we rely on consent, you can withdraw it at any time. Where we process special category data, we do so only where an additional condition under data protection law applies (such as your explicit consent or the establishment or defence of legal claims).

5. Marketing

We may send you information about our services. You can ask us to stop at any time, and every marketing message will include a simple way to opt out. We will not send you electronic marketing without your consent, except where you are an existing customer and the “soft opt-in” applies. Your right to object to direct marketing is absolute and we will always honour it.

6. Who we share your data with

We may share your personal data, only as necessary, with:

- contractors and tradespeople engaged to carry out works, and professional advisers such as surveyors;
- our IT, cloud, communications and other service providers, who act as our processors under contract;
- regulators, HMRC, law enforcement and other authorities where we are required or permitted to do so by law; and
- a buyer or successor if our business is reorganised, sold or transferred.

We do not sell your personal data.

7. Sending data outside the UK

We generally process your personal data within the UK and the EEA. If we ever transfer it to a country outside the UK that is not covered by UK “adequacy” rules, we put in place an approved safeguard such as the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses to make sure your data remains protected.

8. How long we keep your data

We keep your personal data only for as long as we need it for the purposes set out in this notice, or to meet our legal and regulatory obligations, after which it is securely deleted or destroyed. For example, client and transaction records are generally kept for around six years after our relationship ends (or longer where the law requires), and marketing records are kept until you ask us to stop. Our full retention periods are set out in our internal Retention Schedule.

9. How we protect your data

We use appropriate technical and organisational measures to keep your personal data secure, including access controls, encryption, secure networks, staff training and secure disposal of records. We limit access to those who need it to do their jobs.

10. Your rights

Under data protection law you have the right to:

- be informed about how your data is used (this notice);
- access a copy of the personal data we hold about you;
- have inaccurate data corrected, and incomplete data completed;
- have your data erased in certain circumstances;
- restrict how we use your data in certain circumstances;
- data portability to receive certain data in a reusable format;
- object to certain processing, including an absolute right to object to direct marketing; and
- rights regarding automated decisions that have a significant effect on you.

You can exercise your rights, free of charge in most cases, by contacting our Data Protection Officer at info@hapsltd.co.uk. You also have the right to complain to us directly, and to the Information Commissioner's Office (see Section 12).

11. Cookies

Our website uses cookies and similar technologies. We use non-essential cookies only with your consent, and you can manage your preferences through the controls we provide. For more detail, please see our Cookie Policy.

12. How to contact us or complain

If you have any questions about this notice or how we use your data, or you wish to make a complaint, please contact our Data Protection Officer:

Data Protection Officer	IT Manager
Email	info@hapsltd.co.uk
Postal address	105 Carrow Road, Cedar House, Norwich, NR1 1HP

You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority, although we would welcome the chance to deal with your concerns first.

Information Commissioner's Office	Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Helpline	0303 123 1113
Website	ico.org.uk