

CENTRAL BUSINESS AGENCY

PRIVACY STATEMENT

INTRODUCTION AND SCOPE OF THIS PRIVACY STATEMENT

Stephen James Reeves and James Kenneth Hocking (known as *The Partners*) in partnership and trading as Central Business Agency (referred to hereafter as CBA) use the personal information you share with us as 1., a Client (being an individual, partnership or company, who instruct CBA to act on their behalf in the sale or letting of a business as a going concern and/or the sale or letting of commercial premises), or 2., as a Prospective Purchaser/Tenant to facilitate your acquisition of a business as a going concern or to purchase or rent commercial premises. This privacy statement aims to give you a clear view of how we use personal information that you provide, our dedication to protecting it, your rights and the options you have to control your personal information and protect your privacy. It also outlines what personal information we collect about you when you visit our website, how we use your personal information and the third parties we will share it with. We use personal information for various purposes, as described in detail below.

WHO COLLECTS YOUR PERSONAL INFORMATION

The partners and members of staff employed by CBA control the processing of any personal information collected through information you may have input onto our web site, provided by letter, e-mail or verbally by telephone or from visits to our office, which may then be stored within our internal Management Information System, Website or on a specific Client's file.

PERSONAL INFORMATION WE COLLECT FROM YOU

"Personal information" is any information that relates to you and identifies you personally, either alone or in combination with other information available to us. CBA will collect various types of personal information and special categories of personal information (this can include information such as past/present employment history, financial status, copy bank statements, offers of finance, professionally prepared accounts or management accounts, identification documents – for example copies of driving licences in support of identity checks, as required to comply with anti-money laundering or anti-terrorism legislation, employment position (past and present) previous business experience and other sensitive data about you, including the following (as applicable):

CENTRAL BUSINESS AGENCY WEBSITE-

If you are a Prospective Purchaser/Tenant and you register your requirements on our 'Your Preferences' page, you are able to sign-in and amend the data contained on this page utilising your designated email account and password.

CBA will collect the following information when you sign-up for an account if you choose to provide it: Name, telephone number, email address and your personal business and property preferences.

REQUEST FOR FURTHER INFORMATION ON A BUSINESS OR COMMERCIAL PROPERTY

Should you require further information on any of the businesses or commercial property that we are marketing then we may gather further information with regards to your current and previous business experience and financial status together with your home address, which will be recorded on our Internal Management Information System or Client file. This information is required so that we can advise a Client in respect of the standing and financial position of a Prospective Purchaser/Tenant prior to arranging an appointment to inspect the business or premises.

Any e-mails sent by you would normally be kept for no longer than 12 months however, if e-mails relate to a specific business or commercial property transaction they may be retained for a maximum period of seven years.

AUTOMATIC DATA COLLECTION

- You will be required to input all personal information about you on to our website. We will also log personal information requested over the telephone and by email or letter onto our Internal Management Information System.
- We log your IP address;
- We log the referral URL (the site from which the visitor has come);
- We log the pages visited on our website;
- We log information about the device and browser (such as, browser type and version, operating system, etc.).
- We the date and time of the visit and how long you remained on our website and internal Management Information System.
- Cookies and similar devices: We use various technologies to collect and store information when you visit our website.
- Location information: We do not use a location-enabled service – for example GPS signals sent by a mobile device. We do not use technologies to determine location, such as sensor data from your device that may, for example, provide information on nearby Wi-Fi access points, Near Field Communication ('NFC') points and mobile network cell towers.

SOURCES OF INFORMATION

Most of the information we collect about you will be personal information that you have voluntarily provided to us, for example, through our website, by letter or email, or verbally over the telephone. Other sources from whom we may obtain your personal information would be third parties (such as credit reference agencies, law enforcement/regulatory bodies, and companies providing commercially available databases etc.). Some of these third-party sources may include publicly-available sources of information.

HOW WE USE YOUR PERSONAL INFORMATION

The personal information we collect when you initially register your requirements on our 'Your Preferences' web page as a Prospective Purchaser/Tenant will not be utilised by CBA, but is data that will be used to match your requirements with businesses or commercial premises available for sale or to rent which may be of interest to you. The input of data will create a profile to provide us with the information required to keep you informed either by email or verbally of any new instructions which come to the market which may be of interest to you. The personal information we collect from the other sources listed above will be used in the format that it is received, or where appropriate, will be combined with personal information we obtain from other internal or external sources. We use and analyse this personal information where necessary for the following purposes detailed below:

1. Providing further information relating to a business or commercial property we are marketing: We use relevant personal information described above (including your name, address and funding status) to advise Clients with regards to your status prior to arranging an appointment to meet with the Client.
2. Arranging Finance: The information provided may be passed to financial institutions or finance brokers should you instruct us to seek funding in respect of a business or commercial property acquisition on your behalf.
3. Preventing fraud: We will also use your personal information to assess your creditworthiness and to prevent fraud. For this purpose we may need to share your personal information with our credit rating providers (see "How we share your personal information" below). This is necessary for the purposes of our legitimate interests in ensuring we are not the victim of fraud and to ensure that CBA are fully compliant with anti-money laundering and anti-terrorism legislation.
4. Enrichment of our data: We may enhance the information we hold on our database with additional information provided by a third party – for example a solicitor, accountant, bank or mortgage broker to obtain a more detailed assessment of your business or commercial property requirements, your ability to operate a business and also how you would fund an acquisition. We see this as fundamental information to progress a business or property sale/letting prior to instructing solicitors to proceed with fulfilling the legal formalities relating to an acquisition. You can opt-out of us combining your personal information with the information lawfully collected from third parties by contacting us using the contact details set out below.
5. Consent regarding the use of personal information: We will ask for your consent if we wish to use your personal information for purposes other than those listed in this privacy statement and as required to do so under applicable law. We will not use your personal information for other purposes before we have received such consent.

HOW WE SHARE YOUR PERSONAL INFORMATION

We treat your personal information with care and confidentiality and do not share it with third parties other than as set out below. We will share your personal information as necessary and **only for the purposes and on the lawful grounds described below** with the various third parties who process your personal information on our behalf.

With Clients

As we have described above, your personal data may be discussed verbally or via email/letter with our Clients, particularly when arranging an appointment to meet them to inspect the business and/or premises.

With Solicitors

When a sale/letting is agreed Heads of Terms are prepared and information is provided to both the Client and Prospective Purchaser/Tenant and their respective solicitors. Solicitors acting on both sides might also be provided with copies of references and any supporting evidence of funding which could include bank statements.

With Landlords and/or their Property Managers/Surveyors and Solicitors

References on a Prospective Purchaser/Tenant together with CV's and Business Plans may be provided to the landlord, landlord's surveyor, property manager or solicitor.

With Energy Assessors

The Client's name and address and contact telephone number would usually be supplied to an Energy Assessor if they are instructed to inspect the Client's premises to prepare an Energy Performance Certificate.

With Asbestos Surveyors

Asbestos Surveyors may be instructed if there is a requirement to carry out an asbestos survey on a property being sold or let. The surveyor would be provided with the Client's contact details which may include their address, telephone number and email address.

With Lending Institutions

We may from time to time provide background information with regards to a Prospective Purchaser/Tenant who has requested that we seek finance from a lending institution on their behalf. This could be a High Street Bank or Lending Broker. Banks and Brokers would be provided with both information regarding the Prospective Purchaser/Tenants standing, experience, financial position, contact name, address, telephone number and email address. The lending institution could also be provided with accounting information relating to the Client's business and other supporting documentation. The Prospective Purchaser/Tenant may provide this information directly to their current or proposed lender. We may also be requested to provide information to brokers working on behalf of Prospective Purchaser/Tenant from time to time which would include a financial package as described above. This information would usually then be passed over to third-party lenders who would be requested to provide finance. Many brokers have access to a number of lending sources to whom they will pass information relating to both the Client's business and the Prospective Purchaser/Tenant. The broker would look to select a basket of potential lenders to approach, whose lending policy would meet the criteria of the loan application.

With Accountants

From time to time we may be requested by either a Client or a Prospective Purchaser/Tenant to recommend an accountant. In addition accountants acting on behalf of the Prospective Purchaser/Tenant may also request a package of financial information, although this is normally forwarded to them by the Prospective Purchaser/Tenant to whom we would initially send the information. The accountant will require this information to provide professional advice on the business acquisition and may also be involved in seeking finance on the Prospective Purchaser/Tenant's behalf.

With Website Based Advertising Portals

Details with regards to the Client's business and/or premises are uploaded to various internet based advertising portals to include a description of the business and/or premises which might include the name and address and headline financial information such as turnover, gross profit, net profit, number of staff employed, dimensions and a description of the premises, lease terms, stock levels held. The websites that we utilise in this respect are:

www.centralbusinessagency.com - our own website.

www.BusinessesForSale.com - the site is linked to a network of partner websites including *FT.com* (Financial Times), *Telegraph.co.uk* (Daily Telegraph), *ThisIsMoney.co.uk* (Daily Mail and London Evening Standard), *reed.co.uk* (Reed Recruitment Agency), Tiscali and the 'Fish 4' group of websites linked to a number of quality newspapers.

www.DaltonsBusiness.com

www.RightBiz.co.uk

www.Zoopla.co.uk and its sister site, ***www.PrimeLocation.com***

www.Movehut.co.uk

www.PropertySales.com

With Newspaper Based Advertising & Specialist Advertising

Similar advertisements are placed in the commercial section of various newspapers although this advert is less detailed than the information stored on websites and is usually an abbreviated advertisement with regards to the Client's business and/or premises. Advertisements may be placed in the following publications:

The Oxford Times *In Business* supplement

The Gloucester Citizen and Gloucestershire Echo *Business Monthly* features

The [Leamington Courier](#), [Kenilworth Weekly News](#), [Daventry Express](#), [Rugby Advertiser](#), and [Banbury Guardian Business Focus](#) feature.

We may also place advertisements in specific trade related publications but only with the prior agreement of the Client.

With Property Surveyors and Valuers

We may be asked to provide Client contact details including name, address, telephone number and email address when arranging appointments for property surveys and valuations to be undertaken on behalf of a third party lending institution, or possibly for the Prospective Purchaser/Tenant themselves.

With Information Technology Providers

'Oxford IT Solutions' maintain our website upon which Client's business and/or property details are uploaded and Prospective Purchaser/Tenants are able to register their requirements with regards to businesses/premises they are seeking to acquire. Prospective Purchaser/Tenants are emailed information of new instructions and price reductions which meet their requirements as they occur.

'Oxford IT Solutions' are also our preferred choice for any PC hardware installations and may have access to our internal databases from time to time when preparing or upgrading equipment.

'Focus Microsystems' currently provide our Internal Management Information System called SHOP. The system contains information relating to both Clients and Prospective Purchaser/Tenants including names, addresses, telephone numbers, email addresses, and in respect to Prospective Purchaser/Tenants may also contain information with regards to past and present business/employment history together with their financial standing. This is usually headline information only. The Internal Management Information System is stored on a 'Server PC' which is a designated computer holding the database within a network.

Our general operating system is Windows 10 with email provided by Microsoft Office 365 and we rely on Microsoft Firewalls/security systems and also AVG anti-virus software for protection against hackers or viruses. Periodically the management information database is backed-up to a portable hard drive which is controlled by J K Hocking and remains in his possession only.

With Stock Valuers

Where appropriate we recommend the services of a professional stock-valuer to undertake stock valuations prior to the legal completion of a business sale. The stock-valuer would be provided with basic contact details in respect of both Client and Prospective Purchaser/Tenant confined to their names, addresses, telephone numbers and email addresses.

With Credit Reference Agencies for Identity Checks

In compliance with Anti-Money Laundering Regulations and Anti-Terrorism Legislation we obtain specific information from both Clients and Prospective Purchaser/Tenant to undertake these identity checks. This would include full names, addresses (covering five years), date of birth, home telephone number, and a form of supporting identity documentation which would usually be a photo driving licence or passport.

With Social Networks

We will not share your data with any social networks.

LEGAL AND LAW ENFORCEMENT

CBA will disclose personal information where required by law or legal process, for the administration of justice, to protect your vital interest, for investigations by law enforcement or regulatory bodies, to protect and defend CBA's property and legal rights, to protect the personal safety of CBA website or by order of a valid injunction from a court or law enforcement agency.

WITH YOUR CONSENT

We will not share your personal information with other third parties different from those described above. In the event that we are required to supply your data to third parties by applicable law, we will obtain your consent to share your personal information in this way.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We are committed to protecting your personal information and implement appropriate technical and organisational security measures to protect it against any unauthorised or unlawful processing and against any accidental loss, destruction, or damage.

RETAINING YOUR PERSONAL INFORMATION

For Prospective Purchaser/Tenants, we will retain personal information until we are specifically instructed in writing (letter, fax or email) to remove the data from our records, subject to this data being held for a minimum of three years. For Clients, data will again be held until we are specifically instructed in writing to remove it from our records, subject to data being held for a minimum of seven years. The following are examples to illustrate how CBA keeps your personal information for as long as necessary for a particular purpose:

- we may keep your personal information collected during a business or commercial property acquisition for as long as required by tax laws (seven years in the United Kingdom);
- we may keep your personal information for a shorter period if you ask us to delete your personal information. In such an instance CBA will aim to delete your personal information within a maximum period of one month from the date of the request, subject to the minimum retention periods as described above.

INTERNATIONAL TRANSFERS OF YOUR PERSONAL INFORMATION

We store and process your personal information in the European Union. This personal information is not transferred outside of the European Economic Area ("EEA") to a country not regarded under European Law as providing the same level of data protection as the country in which you normally use our products and/or services, being the United Kingdom.

INFORMATION ABOUT CHILDREN

We do not intentionally collect personal information about children under the age of 16. If we become aware that we have inadvertently collected personal information about children under the age of 16 we will take steps to delete the information as soon as possible, except where we are required by applicable law to keep it.

Where we know a child is above the age of 16, but considered a minor under applicable law, we will obtain parental/guardian consent prior to using that child's personal information.

LINKS TO OTHER WEBSITES AND SERVICES

The websites we advertise with may contain links to third party websites, and some of our services provide you with access to third party services (such as our regulatory body 'PropertyMark').

We have no control over how third party websites and services process your personal information. We do not review third party websites and services, and we are not responsible for such third party websites and services or their privacy practices. Please read the privacy statements of any third party websites or services that you access from our websites or services.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

Fair play and transparency are important to us. We are open about the personal information we collect and have implemented mechanisms to enable you to exercise any rights you might have with respect to your personal information.

WITHDRAWING CONSENT

Where we have obtained your consent in relation to any matter in relation to your personal information (e.g. your consent to receiving direct marketing messages), you can withdraw this consent at any time by contact us using the contact details set out below.

ACCESS TO, DELETION, AND CORRECTION OF PERSONAL INFORMATION

Prospective Purchaser/Tenants can access their personal information through the 'Your Preferences' page of our website. Our website provides the option to add, update or remove information we have about you.

If any personal information we have about you is not accessible through our website you can send us a request for access to this information at no cost using the contact details set out at the end of this privacy statement.

After receiving your request and sufficient information to verify your identity we will provide you with a copy of the personal information we have about you which you are entitled to have under applicable law. We will also confirm the purposes for which such personal information is being used, its recipients and the origin of the information.

You may write to us at any time requesting amendments to certain personal information that you consider to be incorrect or irrelevant or to request that we block, erase or otherwise remove your personal information. You may also write to us at any time to object to our use of your personal information, restrict our use of your personal information, or request that we provide your personal information in a usable electronic format and transmit to a third party (right to data portability). We will comply with these requests in relation to your personal information in line with applicable law.

OPTING OUT AND UNSUBSCRIBING FROM MARKETING MESSAGES

All our marketing communications contain an easy way to opt out from receiving future messages or via the unsubscribe link in your personal preferences section within our website. Alternatively you could contact:

Stephen Reeves or Jim Hocking (Partners – Central Business Agency)

by email: post@centralbusinessagency.com

or in writing to:

The Partners

Central Business Agency

5a King Edward Street

Oxford

OX1 4HS

Please note that if you choose to opt out of receiving marketing messages in the manner explained above, we will continue to process your personal information, in particular to allow us to understand your specific business or commercial property requirements, but we will stop using your personal information to send you personalised or non-personalised marketing messages. If you would like us to stop such processing in part or in full, we have explained how to do this in the above paragraph.

CHANGES TO THIS POLICY

CBA has pledged to adhere to the fundamental principles of privacy and data protection. We therefore regularly review our online privacy statement in order to ensure that it is free of errors and clearly visible on websites, that it contains appropriate information about your rights and our processing activities, and that it is implemented and is compliant with applicable law. We may update this privacy statement from time to time to keep it up to date, to keep pace with new developments and opportunities relating to the Internet and to stay in line with applicable law. If we make significant changes to this privacy statement, we will inform you by posting a notification on our websites along with an updated version of the privacy statement

CONTACT INFORMATION

If you have any questions about our use of your personal information, how to exercise your rights or about our privacy statement, you are welcome to contact the Partners, Stephen Reeves and Jim Hocking, by email: post@centralbusinessagency.com.

Alternatively, please write to:

The Partners
Central Business Agency
5a King Edward Street
Oxford
OX1 4HS

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to your local data protection authority using their website.

LAST UPDATED: 11th May 2018.

COOKIE STATEMENT

Cookies are used, but only for the purposes of providing core functionality of the website and for monitoring visitor trends and browsing habits while on the site. They are not used for marketing or targeted ads.