

Privacy Policy

Alex Marks Ltd Registered office: 448 Hornsey Road, London, N19 4EE Company number: 07071445 | ICO registration number: Z3047196

Last updated: 22 July 2026

1. Who we are

Alex Marks Ltd ("we", "us", "our") is a data controller for the personal data described in this policy. We are registered with the Information Commissioner's Office (ICO).

Note: under the Data (Use and Access) Act 2025 (DUAA), the ICO is being restructured into the "Information Commission" as reforms are phased in during 2026–2027. Until that transition completes, the ICO remains the UK's supervisory authority and this policy refers to it by that name.

This policy explains how we collect, use, store, share and protect personal data when you:

- enquire about, view, buy, sell, let or rent a property through us;
- instruct us as a seller, landlord, buyer or tenant;
- use our website or contact us online;
- attend our office or a property we manage; or
- otherwise interact with us as a supplier, contractor or job applicant.

Data protection queries: admin@alexmarks.co.uk or **020 7078 7950**. If we appoint a Data Protection Officer, their details will appear here.

2. The personal data we collect

Depending on your relationship with us, we may collect:

- **Identity data:** name, date of birth, photo ID, proof of address.
- **Contact data:** address, email, phone number.

- **Property data:** property details, valuation information, floorplans, EPC data, title information.
- **Financial data:** proof of funds, mortgage agreement in principle, source of funds/wealth (for anti-money laundering checks), bank details for rent or fee payments.
- **Referencing and tenancy data:** employment and income details, credit history, previous landlord references, guarantor details (for tenants).
- **Right to rent / immigration status data:** where required by the Immigration Act 2014, for tenancies.
- **Communications:** emails, call recordings, viewing feedback, notes from meetings.
- **Technical data:** IP address, browser type, device data, cookies (see Section 9).
- **CCTV images:** if you visit our office or a managed property fitted with CCTV.
- **Special category data:** only where relevant and necessary — for example, health or accessibility information needed to arrange a suitable viewing, or details shared with us because you or a household member is vulnerable and needs extra support during a transaction or tenancy. We only collect this with your explicit consent, or where we have another clear legal basis (e.g. a substantial public interest condition under the DPA 2018), we keep it separate from general notes where possible, and we limit access to staff who need it to help you.

We collect this directly from you, from property portals (Rightmove, Zoopla, OnTheMarket), from referencing and credit agencies, from Land Registry and other public registers, from your solicitor/conveyancer or mortgage broker, and from cookies on our website.

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

Purpose	Lawful basis (UK GDPR Art. 6)
Arranging viewings, valuations and providing agency services	Performance of a contract / steps prior to a contract
Verifying identity and source of funds (anti-money laundering)	Legal obligation (Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, as amended)
Referencing tenants and guarantors	Performance of a contract; legitimate interests

Right to rent checks	Legal obligation
Marketing a property (photos, listings, portals)	Performance of a contract; consent where required
Sending you similar-property alerts and marketing	Consent, or our (and third parties') legitimate interests where permitted, subject to your right to object at any time
CCTV at our premises or managed properties	Legitimate interests (security)
Improving our service, fraud prevention, record-keeping	Legitimate interests
Complying with court orders, regulators or the Property Ombudsman	Legal obligation

Where we rely on **legitimate interests**, we have assessed that our interest (or a third party's) in processing does not override your rights and freedoms. You can ask us for a copy of that assessment.

The DUAA has also introduced a new “**recognised legitimate interest**” basis for narrowly defined purposes set out in law (e.g. safeguarding, crime prevention, responding to emergencies). We only rely on this where it genuinely applies and does not require the usual balancing test.

We do not use automated decision-making that produces legal or similarly significant effects about you without human involvement. If this changes (for example, automated referencing decisions), we will tell you and explain your rights, including the right to request human review.

Profiling and marketing segmentation: we may group your data by criteria such as budget, preferred area or property type, so we can send you relevant property alerts rather than blanket marketing. This is a form of low-impact profiling to make our marketing more useful to you — it doesn't produce any legal or similarly significant effect, and you can opt out of it at any time (see Section 10).

4. Anti-money laundering and identity checks

As estate agents, we are a “relevant person” under the Money Laundering Regulations 2017 (as amended) and must verify the identity, and in some cases the source of funds, of buyers

and sellers before completing a transaction. We may use electronic verification services, which check your details against fraud-prevention and credit reference databases, and may leave a "soft" search footprint that does not affect your credit score. We retain this data for the period required by law (see Section 8).

5. Who we share your data with

We share personal data, only as needed, with:

- **Property portals** (Rightmove, Zoopla, OnTheMarket) to advertise properties.
- **Solicitors, conveyancers and licensed conveyancers** acting in a transaction.
- **Mortgage brokers, lenders and surveyors**, with your consent, to progress a purchase.
- **Referencing and credit reference agencies**, for tenant/guarantor checks.
- **Electronic ID verification and AML compliance providers**.
- **Contractors and tradespeople**, for property maintenance (landlords/tenants).
- **The Property Ombudsman**, as our redress scheme.
- **The ICO**, courts, regulators or law enforcement, where legally required.
- **IT, CRM and cloud storage providers** who process data on our behalf under written contracts.

We do not sell your personal data. Any third-party marketing partners are used only with your consent.

6. Referral fees and related obligations

Under the Estate Agents Act 1979 and the Consumer Protection from Unfair Trading Regulations 2008, we must disclose any financial or other benefit we receive for referring you to a third party (for example, a mortgage broker, conveyancer, or surveyor). Where we make such a referral, we will tell you about the referral fee arrangement, separately from this policy, before you decide whether to use that service. Accepting a referral is always optional and does not affect the service we provide to you.

We are a member of The Property Ombudsman (membership number D6402), an approved redress scheme, and comply with its Code of Practice in how we handle your data and your complaints about our service.

7. International transfers

Where a supplier (e.g. a cloud services provider) stores or processes data outside the UK, we ensure appropriate safeguards are in place, such as the UK's international data transfer agreement, an EU Commission adequacy decision recognised by the UK, or standard contractual clauses. You can request details of the safeguards used for a specific transfer.

8. How long we keep your data

Data type	Typical retention
AML/identity verification records	5 years from the end of the business relationship (legal requirement)
Completed sale/letting transaction files	6 years from completion (limitation period for contract claims)
Unsuccessful applicant/buyer enquiries	Up to 2 years, or until you ask us to stop marketing to you
Tenant referencing data	Duration of tenancy plus 6 years
CCTV footage	Typically 30 days, unless needed for an investigation
Marketing consents	Until withdrawn

We review data periodically and delete or anonymise it once it is no longer needed, unless we must keep it longer for legal, accounting or regulatory reasons.

9. Cookies and website tracking

Our website uses cookies and similar technologies for essential site functions, analytics, and (with your consent) marketing. Under the Privacy and Electronic Communications Regulations (PECR) — as amended by the DUAA — we still need your consent for non-essential cookies, and you can manage your preferences through our cookie banner or your browser settings at any time. See our [\[Cookie Policy\]](#) for full details of the cookies we use and their duration.

10. Your rights

Under UK GDPR and the Data Protection Act 2018 (as amended by the DUAA), you have the right to:

- **Access** the personal data we hold about you.
- **Rectify** inaccurate or incomplete data.
- **Erase** ("right to be forgotten"), in certain circumstances.
- **Restrict** processing in certain circumstances.
- **Object** to processing based on legitimate interests or for direct marketing (we will always stop direct marketing on request).
- **Data portability**, for data you provided to us that we process by consent or contract, using automated means.
- **Withdraw consent** at any time, where processing is based on consent.
- **Complain directly to us** about how we've handled your data — the DUAA introduced a formal right to raise a complaint with the controller first, and we aim to respond within 30 days.
- **Complain to the ICO** if you remain unhappy: ico.org.uk/make-a-complaint, or 0303 123 1113.

To exercise any of these rights, contact us using the details in Section 1. We may need to verify your identity first. There's no charge for most requests, and we aim to respond within one month.

11. Security

We use appropriate technical and organisational measures — including encryption, access controls, staff training and secure disposal of documents — to protect your data against unauthorised access, loss or misuse. All staff handling AML or financial data are trained on our data protection procedures.

Before starting any new activity that's likely to result in a high risk to your rights and freedoms (for example, a new tenant-screening tool or a large-scale marketing database), we carry out a Data Protection Impact Assessment (DPIA) to identify and reduce that risk in advance.

12. If something goes wrong: data breaches and complaints

If we become aware of a personal data breach that's likely to result in a risk to your rights and freedoms, we will:

- assess and, where required, report it to the ICO within 72 hours of becoming aware of it; and
- notify you directly, without undue delay, if the breach is likely to result in a high risk to you — explaining what happened, the likely consequences, and the steps we're taking.

If you're unhappy with how we've handled your data, please contact us first using the details in Section 1 — as explained in Section 10, we aim to resolve complaints within 30 days. You can also complain to the Property Ombudsman about our service, or to the ICO about our data handling, at any time; you don't have to complain to us first.

13. Children

Our services are aimed at adults. We don't knowingly collect personal data from children, though a child's details may appear incidentally in household or tenancy information provided by an adult.

14. Changes to this policy

We may update this policy to reflect changes in our practices or the law, including further phases of the DUAA as they come into force. The "last updated" date at the top shows the current version. Material changes will be highlighted on our website.

15. Contact us

Alex Marks Ltd 448 Hornsey Road, London, N19 4EE admin@alexmarks.co.uk | 020 7078 7950

If you're unhappy with our response, you can contact the Information Commissioner's Office at ico.org.uk or 0303 123 1113.