
LANDLES AUCTIONEERS 1856 LTD

PRIVACY NOTICE

1. Introduction

Like most businesses, Landles Auctioneers 1856 Ltd holds and processes a wide range of information about its clients and other persons who may be interested in its services.

This privacy notice applies to all Landles Auctioneers 1856 Ltd operations in the UK, and explains the type of information that we process, why we are processing it and how that processing may affect you.

The privacy notice is split into the sections listed below. The *Glossary* section explains what we mean by “personal data”, “processing”, and other terms used in this notice.

We may update this privacy notice from time to time, and will post any revised notice on this webpage. Where appropriate we may notify you by email or by a notice on our website that our privacy notice has changed but we recommend that you check this page regularly. Any changes will be immediately effective on posting.

2. Who we are

Landles Auctioneers 1856 Ltd (UK company number 08392812) of Blackfriars Chambers, King’s Lynn, Norfolk, PE30 1NY, is the primary Data Controller for the purposes of EU Data Protection Legislation.

3. How and when we collect your personal data

Collection directly from you in response to our request

Most of the personal data we process about you comes directly from you (whether face to face, over the telephone, on a paper form, by email or online) for example:

- when you register to bid in an auction, agree to sell your property through us or ask us to perform a valuation;
- when you express an interest in buying or selling certain types of property to one of our staff or representatives;
- should we operate a subscription catalogue service or other subscription service
- when you sign up to receive news about upcoming auctions and events relating to particular areas of interest;
- when you attend a Landles Auctioneers 1856 Ltd event.

Automatic collection when you telephone bid, call Client Services, visit our premises or our website

Your voice may be recorded when you call us or when you use our telephone bidding service.

Your image may be collected by Landles Auctioneers 1856 Ltd if you attend our premises. We use CCTV at our salerooms and offices for the protection of our staff, our visitors and the property that we sell. We also video our auctions for security reasons and to monitor bidding practices.

We collect data about your computer when you visit our website, which includes your internet address, your operating system and browser type. We use this information for our internal system administration, to help diagnose problems with our servers, to administer our website and monitor and improve the user experience.

We also collect data about you through cookies. A cookie is a simple text file that is stored on your computer or mobile device by our website’s server which allows our website to remember your preferences or transactions that are in progress. You can see more detail on cookies in our *Cookies Policy*.

Collection of data from other sources

We may also obtain information about you and/or the property you own or wish to collect from other sources, for example:

- When someone informs us that you are authorised to bid on their behalf at Landles Auctioneers 1856 Ltd or collect your property;
- When someone introduces you to us
- When we research artwork or other objects and we find information about you in sources such as newspaper articles, exhibition catalogues, public auction results, or one of our contacts gives us feedback in relation to objects or persons they have been told about.

4. What personal data do we process and why?

We have set out below the types of personal data that we process, the purposes for which we use it and the legal grounds on which we process it. The *Glossary* contains more information about the legal grounds for processing.

Purpose	Examples of personal data (please note that the list is not exhaustive)	Legal grounds for processing
To provide you with requested services (for example, bidding, selling, valuations, storage, shipping, loan referral, catalogue subscription, restoration, expertise)	<ul style="list-style-type: none"> • name, title, and contact details (including email address, postal address, telephone numbers) • your bank account details (if we need to pay you) or payment card details or bank transfer receipt (if you need to pay us) • the person or organisation who has introduced you, and any fee they receive • details of the property to which the services relate • nature of the services including contractual terms • details of your insurance if your property remains at your risk • records of your communications with us (including bidding instructions recorded over the telephone) 	Performance of a contract
To evidence our compliance with legal requirements, (for example, knowing our clients and preventing money-laundering, payment of taxation and customs duties, anti-discrimination)	<ul style="list-style-type: none"> • your date of birth, identification documents (including photo) and the results of identification verification checks • details of your past transactions (including any tax paid or tax withheld) and/or shipments (including any permits obtained or duties paid) • any requirements relating to Landles Auctioneers 1856 Ltd obligation to make reasonable adjustments to accommodate a disability or otherwise meet your specific needs • any information relating to a dispute or legal proceeding 	Compliance with a legal obligation
To keep you, our staff, and property on our premises secure	<ul style="list-style-type: none"> • CCTV images 	Legitimate Interests
To provide you with details about upcoming auctions, other events or types of property that interest you, and Landles Auctioneers 1856 Ltd wider services	<ul style="list-style-type: none"> • your name, email address and/or postal address • your marketing and communication preferences 	Legitimate Interests (for clients who have previously requested or received services) Consent (for clients who have not requested or received services but have signed up to receive Landles Auctioneers 1856 Ltd news online, at an event, by talking to a member of staff)
To create and maintain records on art objects to assist with checks on authenticity, provenance and title and prevent fraud, theft or other unlawful activities	<ul style="list-style-type: none"> • your interest in, possession of, or ownership (historic or current) of any relevant art object, or similar object • allegations of fraud, theft or other unlawful activities relating to an object connected to you • communications with the police, courts, regulators or other government or law enforcement authorities in relation to you or your object 	Legitimate interests Public interest
To monitor the performance of our website and make your user experience better	<ul style="list-style-type: none"> • your internet address • your browser type and operating system • the data obtained from cookies, web logs and other similar technologies that monitor the use of our website 	Legitimate Interests
To monitor your use of our services, train our staff and improve your client or user experience	<ul style="list-style-type: none"> • your complaints, opinions, responses to our surveys or market research • your voice when you call us or use our telephone bidding services 	Legitimate Interests

5. Who gets to see your personal data?

LANDLES Group

Your personal data will be processed by the Landles Auctioneers 1856 Ltd Company that initially receives it, and may also be transferred to and processed by other companies within the Landles group.

Outside the Landles Group

We do not transfer your personal data to organisations who wish to use it for their own marketing promotions or other purposes. We only transfer your personal data to other organisations where it is necessary to enable us to provide you with the services you have requested (for example: we may transfer your data to our bank, payment card acquirers, shippers, warehouses, insurers, experts who help us authenticate or value property, event venues, caterers, catalogue and direct marketing fulfilment and distribution). Where we do so it will be on the basis that these organisations are required to keep the information confidential and secure, and they will only use the information to carry out the instructed services.

We may also need to retain and disclose certain information about you to appropriate agencies to conduct anti-money laundering and trade sanction checks and to assist with fraud and crime prevention and detection.

No government entity has direct access to your data. Where we receive a request from a government or law enforcement authority to provide your data, we will only disclose such information where we are ordered to do so by a court or we are otherwise satisfied after internal review that the body making the request has both the right to seek disclosure and has followed the correct process.

6. Is your personal data transferred out of the EEA?

We have no overseas offices or companies and would therefore not knowingly transfer your information overseas.

7. How long will we keep your personal data?

We will retain your personal data for as long as is necessary to provide the relevant services, maintain business records to satisfy tax, legal and other regulatory requirements, and protect and defend against potential legal claims.

In the context of our research and records on ownership of art objects to assist with checks on authenticity, provenance and title, we will keep this data for as long as the record is relevant to our legitimate business interest and the public interest.

8. What steps do we take to keep your personal data secure?

We will take all reasonable and appropriate steps to protect the security and integrity of all personal information provided via our website, or by any other means electronic or otherwise.

We use a variety of security technologies and procedures to help protect your personal details from unauthorised physical and electronic access.

As effective as modern security practices are, we cannot guarantee the complete security of personal data held in our systems, nor that that information you supply through the internet or any computer network is entirely safe from unauthorised intrusion, access or manipulation during transmission. Any transmission is at your own risk. We will not be liable for any resulting misuse of your personal data.

9. Third party websites

Landles Auctioneers 1856 Ltd websites may contain links to other websites not operated by us. The information you provide to us will not be transmitted to other websites, but these other websites may collect personal information about you in accordance with their own privacy notice. Landles Auctioneers 1856 Ltd cannot accept any responsibility for the privacy practices or content of those websites.

10. Access to your data and other rights

We try to be as open as we can about the data that we process and recommend you ask us if you have questions about the data we hold on you.

Subject Access Requests

If you are a resident of the EU, you have the legal right to make a "subject access request". If you exercise this right and we process personal data about you by automated means or as part of a Filing System, we are required to provide you with a description and copy of that personal data, and tell you why we are processing it.

Other rights for EU residents

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing, or have its processing restricted.

If you have provided us with data about yourself and the grounds for processing is Contract or Consent you have the right to be given the data in machine readable format for transmitting to another data controller.

If we are relying on Consent as the grounds for processing your data you may withdraw consent at any time. This will not affect the lawfulness of Landles Auctioneers 1856 Ltd processing of your data prior to your withdrawal.

Contact Information

If you have any queries in relation to Landles Auctioneers 1856 Ltd processing of your personal data please contact us by email at: lots@landlesauctioneers1856.co.uk

Complaints

If you have any complaints relating to the processing of your personal data, please contact us at lots@landlesauctioneers1856.co.uk. You may raise a complaint with the UK Information Commissioner (<https://ico.org.uk/>) or your local regulator if you consider that we have infringed applicable data privacy laws when processing your personal data. This right is without prejudice to any other administrative or judicial remedy you might have.

11. Glossary

Compliance with a legal obligation - processing is necessary to ensure we comply with our legal and regulatory obligations.

Consent – you have given specific consent to the processing of your personal data.

Data Controller – the person who determines the purposes and means of processing personal data.

EEA – the European Economic Area which comprises countries that are members of the European Union and Norway, Iceland and Liechtenstein.

Filing System – a structured set of personal data that is accessible according to specific criteria.

Legitimate Interests - processing is necessary for our or a third party's legitimate interests in carrying on, managing and administering our respective businesses effectively and properly (except where our or the third party's interests are overridden by your own interests, rights and freedoms).

Performance of a contract – processing is necessary to carry out our contractual duties, exercise our contractual rights or otherwise perform our contract with you, or to take steps at your request to enter a contract.

Personal Data - any data relating to an identified or identifiable natural person. This can include names, user ID, location data, email addresses, photographs, job applications, purchase history, user account information, opinions, and correspondence to and from an individual.

Processing - any operation performed on personal data, such as collection, recording, storage, and retrieval, use, combining it with other data, transmission, disclosure or deletion.

Public Interest – processing is necessary for the performance of a task carried out in the public interest