

Hutchinson Scott Auctioneers values your privacy and is committed to safeguarding your personal information. This privacy notice will explain to you about how we handle your personal data when you use our website (independent of where you come from), as well as your privacy rights and how the law protects you.

You may also get a pdf version of the policy here. Please also consult the Glossary for clarification on any of the words used in this privacy notice.

This privacy notice is presented in a layered style, allowing you to navigate to the various sections listed below.

1. ***IMPORTANT INFORMATION AND WHO WE ARE***
2. ***THE DATA WE COLLECT ABOUT YOU***
3. ***HOW IS YOUR PERSONAL DATA COLLECTED***
4. ***HOW WE USE YOUR PERSONAL DATA***
5. ***DISCLOSURES OF YOUR PERSONAL DATA***
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1. IMPORTANT INFORMATION AND WHO WE ARE

THE OBJECTIVE OF THIS PRIVACY NOTICE

This privacy notice serves to inform you about how Hutchinson Scott Auctioneers collects and processes your personal data through your use of this website, along with any data you may provide through this website when you sign up to receive information about our auctions, catalogues, or to bid or participate in an auction.

This website is not designed for children, and we do not intentionally gather data about them.

It is essential that you read this privacy notice in conjunction with any additional privacy notice or fair processing notice that we may publish on specific occasions when we collect or process personal data about you, so that you are completely informed of how and why we use your data. This privacy notice complements and does not supersede the other notifications.

CONTROLLER

Hutchinson Scott Auctioneers is the controller and responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy notice).

If you have any questions about this, please contact us at sales@hutchinsonscott.co.uk using the details set out below.

CONTACT DETAILS

Our full details are: Hutchinson Scott Auctioneers

Full name of legal entity: Hutchinson Scott Ltd

Name of data privacy manager: Haydon Bottomley

Email address: Haydon@hutchinsonscott.co.uk

Postal address: Hutchinson Scott Auctioneers, Embsay Mills, Embsay, Skipton, BD23 6QR

Telephone number: 01756 798333

You have the right to file a complaint with the Information Commissioner's Office (ICO), the UK's supervisory authority for data privacy problems, at any time (www.ico.org.uk). We would, however, welcome the opportunity to address any issues before you approach the ICO, so please contact us first.

CHANGES TO THE PRIVACY NOTICE

This version was last updated on 31.08.2021

PLEASE KEEP US UPDATED ABOUT YOUR DETAILS

The personal information we have on file for you must be correct and up to date. Please notify us if your personal information changes throughout your partnership with us.

THIRD-PARTY LINKS

Links to third-party websites, plug-ins, and apps may be included on this website. By clicking on those links or activating those connections, third parties may be able to gather or share information about you. We have no control over these third-party websites and are not liable for their privacy policies. We urge you to read the privacy notices of every website you visit after leaving ours.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, often known as personal information, refers to any information about an individual that may be used to identify that person. It excludes data from which the identity has been erased (anonymous data).

We may collect, use, retain, and transmit several types of personal data about you, which we have categorise as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address where applicable, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have bid for and/or purchased via us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or bids made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We gather no **Special Types of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We also do not gather information on criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we are required by law or under the terms of a contract we have with you to collect personal data and you fail to submit that data when requested, we may be unable to execute the contract we have or are attempting to enter into with you (for example, to provide you with goods or services). In this scenario, we may be forced to cancel a product or service you have with us; nevertheless, we will tell you if this is the case.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - create an account on our website;
 - submit bids;
 - submit a valuation request;
 - request a condition report;
 - sign up to our Lot Alert service;
 - contact us through the website or otherwise (by post, email or phone);
 - subscribe to our auction catalogues;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

(a) analytics providers (such as Google based outside the EU);

(b) search information providers (based inside **OR** outside the EU).

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services (based inside **OR** outside the EU).
- Identity and Contact Data from publicly available sources (such as Companies House and the Electoral Register based inside the EU).

(c) Online bidding platforms (to include, but not limited to, the-saleroom.com).

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal information where permitted by law. In most cases, we will use your personal information in the following ways:

Where we need to carry out the deal we are going to or have already entered into with you.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We do not rely on permission as a legal basis for handling your personal data in general. You may withdraw your permission to marketing at any time by unsubscribing or changing your choices using the opt-out link contained in all of our marketing communications, or by contacting us at sales@hutchinsonscott.co.uk.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have included a table-format summary of all the methods we intend to use your personal data, as well as the legal basis on which we will depend. We have also highlighted our legitimate interests when applicable.

Please keep in mind that depending on the precise reason for which we are utilising your data, we may handle your personal data for more than one legal justification. If you require additional information regarding the precise legal ground on which we are relying to process your personal data, please check the table below.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|--|---|--|
| To register you as a new customer/bidder | (a) Identity (b) Contact | Performance of a contract with you |
| To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) |
| To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |

| | | |
|---|--|---|
| To enable you to partake in a survey | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications | (a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity (b) Contact (c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical (b) Usage | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |

| | | |
|---|--|---|
| To make suggestions and recommendations to you about goods or services that may be of interest to you | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile | Necessary for our legitimate interests (to develop our products/services and grow our business) |
|---|--|---|

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

OPTING OUT

You could indeed request us to avoid sending you marketing communications at any time by logging into the website and checking or unchecking applicable boxes to modify your marketing preferences, or by following the opt-out links on any marketing message sent to you, or by contacting us at sales@hutchinsonscott.co.uk at any time.

If you opt out of receiving these marketing messages, your personal data supplied to us as a consequence of a product/service purchase, warranty registration, product/service experience, or other transactions will not be affected.

COOKIES

Please see our [Cookie Policy](#) here

CHANGE OF PURPOSE

We will only use your personal data for the reasons for which we obtained it, unless we reasonably believe that we need to use it for another reason that is consistent with the original purpose. Please contact us if you would want an explanation of how the processing for the new purpose is compatible with the original purpose.

If we need to use your personal data for an unconnected purpose, we will tell you and explain the legal basis that enables us to do so.

Please keep in mind that we may treat your personal data without your knowledge or consent when needed or authorised by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may be required to disclose your personal information with the parties listed below for the purposes listed in the table in paragraph 4 above:

- Third-party consultants, contractors, or other service providers, such as I.T support, software suppliers, and website developers.

All third parties are required by us to preserve the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes, and we only allow them to handle your personal data for the reasons indicated by us and in line with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**).

7. DATA SECURITY

We have implemented adequate security measures to protect your personal information from being unintentionally lost, used or accessed in an unauthorised manner, changed, or disclosed. Furthermore, we restrict access to your personal data to employees, agents, contractors, and other third parties that have a legitimate business need to know. They will only process your personal data if we direct them to do so, and they are bound by a duty of secrecy.

We have processes in place to deal with any suspected personal data breach, and we will inform you and any applicable authority if we are legally obligated to do so.

Please be advised that online communications, including email, are not safe unless they are encrypted.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only keep your personal information for as long as is required to fulfil the reasons for which it was obtained, including any legal, accounting, insurance valuation, or reporting obligations.

We consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements when determining the appropriate retention period for personal data.

We may provide you with information on the retention periods for various components of your personal data upon request.

9. YOUR LEGAL RIGHTS

Under some conditions, you have rights in regard to your personal data under data protection regulations (see also our glossary, below).

If you desire to exercise any of the above-mentioned rights, please email sales@hutchinsonscott.co.uk

NO FEE USUALLY REQUIRED

You will not be charged a price to view your personal information (or to exercise any of the other rights). However, if your request is plainly unjustified, repeated, or exorbitant, we may impose a fair price. Alternatively, under these instances, we may decline to comply with your request.

WHAT WE MAY NEED FROM YOU

We may need to ask you for particular details to authenticate your identity and guarantee your right to access your personal data (or to exercise any of your other rights). This is a security step to guarantee that personal information is not revealed to anybody who does not have the right to receive it. We may also call you to obtain further information about your request in order to expedite our answer.

TIME LIMIT TO RESPOND

We make every effort to reply to all genuine inquiries within 28 days. If your request is extremely difficult or you have made a number of requests, it may take us longer than a month. We will alert you and keep you updated in this scenario.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at sales@hutchinsonscott.co.uk.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us

to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.