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1. Who are we?

Cornwall Property Solutions trading as Lang Llewellyn & Co (Registered Address: Pendennis Court, Falmouth Business Park, Bickland Water Road, Falmouth, Cornwall, TR11 4SZ) has created this Privacy Notice to offer transparency and clarity about what personal data we process and how we use your personal data when you deal with us as a Landlord, tenant, seller, buyer, browsers of our website, or other, whether current, former or prospective. We are registered with the ICO No. ZB350442, registered with HMRC for anti-money laundering supervision No. XHML00000219716 and a member of The Property Ombudsman T08495 and a Client Money Protection scheme: Propertymark C0136731.

If you have any questions about this Privacy Notice, you can contact our Compliance Manager Rachael Mills.

We are a Data Controller when we deal with the personal data of our own clients, applicants, tenants, buyers and website users, however in some circumstances we act as a Data Processor – for example, where we process data purely on the documented instructions of a landlord client.

Our website is not intended for children, and we do not knowingly collect data relating to children, except where a landlord or tenant tells us about household members as part of a tenancy.

2. What personal data do we collect?

Depending on your relationship with us, we may collect:

- **Basic details:** name, address, contact details and date of birth.
- **Identity and right to rent documents:** passport, driving licence, visa or immigration status.
- **Financial details:** bank details, income and employment information, credit history and source of funds.
- **Property details:** ownership and title information, mortgage lender permissions (consent to let) and tenancy details.
- **Special category and criminal offence data** in limited circumstances – see section 7.
- **Website and communication data:** IP address, cookies, emails, call logs and call recordings.

Full details of how and why we use this data are set out in sections 6 and 12 below.

3. What are your rights?

You have several rights which you can exercise free of charge. In certain circumstances we reserve the right to charge a reasonable fee if your requests are manifestly unfounded or excessive.

You have the following rights:

- **Right of access:** You can request a copy of the personal data which we hold about you, as well as details about why and how we use it.
- **Right to rectification:** You can ask us to change or complete any personal data we hold about you which is inaccurate or incomplete.
- **Right to erasure ('right to be forgotten'):** In certain circumstances, you can ask us to delete any personal data we hold about you. Please note that we must retain some personal data by law – for example, anti-money laundering records – even after a request for erasure.
- **Right to restriction:** You can ask us to restrict how we use your personal data in certain circumstances – for example, while we consider an objection you have raised, or while we check the accuracy of data you have disputed.
- **Right to data portability:** In certain circumstances, you can ask us to transfer the data you have provided to us to another organisation. This would be sent in a structured, commonly used, machine-readable form.
- **Right to object:** You can object to us using your personal data for particular purposes. You can object to direct marketing at any time, and we will stop.
- **Right to withdraw consent:** Where we rely on your consent (for example, for non-essential cookies, property alerts or certain marketing), you can withdraw it at any time.
- **Automated decision-making:** You have the right not to be subject to decisions based solely on automated processing which have legal or similarly significant effects on you. Our referencing provider uses automated checks to assess tenancy applications; you can ask for a decision to be reviewed by a person.

For more information about these rights and when you can exercise them, please visit the Information Commissioner's guide to [Individual Rights](#).

If you wish to exercise any of these rights, please contact us at Hello@llcoproperty.com or 01326 331812. We will respond to you within one month. If your request is complex and we require more time, we will contact you to let you know within the first month.

4. How can you submit a query or a complaint?

We are always happy to answer your queries regarding privacy. Please contact our Compliance Manager at Rachael@llcoproperty.com.

If you have a complaint, please get in touch with us first so that we can resolve any concerns in line with our Data Protection Complaints Policy. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe your personal data has been processed in a way which does not comply with data protection legislation. You can call the ICO helpline on 0303 123 1113 or visit their website [here](#). Complaints about our service (rather than about data protection) can also be referred to our redress scheme: The Property Ombudsman.

5. More information about our organisation and this Privacy Notice

If Lang Llewellyn & Co is sold or transfers its assets to another party, your personal data could be one of the transferred assets. If your personal data is transferred, it will remain

subject to this Privacy Notice. Your personal data will be passed on to a successor in the event of a liquidation or administration. We will contact you in advance to let you know about any changes.

We keep this Privacy Notice under regular review. The most recent update was on 15th September 2026.

6. Identity, anti-money laundering (AML) and sanctions checks

As a letting and estate agency, we are required by law to carry out certain checks before, and sometimes during, our relationship with you. We carry out these checks under the lawful basis of **legal obligation**, so we do not need your consent, and we cannot act for you or continue a transaction if we cannot complete them.

Who we check

- **Sellers and buyers:** estate agency work is regulated under the Money Laundering Regulations 2017, and we are supervised by HMRC. We must complete customer due diligence on sellers before marketing a property, and on buyers when their offer is accepted.
- **Landlords and tenants:** We must also complete customer due diligence on both landlord and tenant under the Money Laundering Regulations.
- **All landlords and tenants (sanctions):** since 14 May 2025, letting agents must comply with UK financial sanctions obligations regardless of the rent level. This means we screen all landlords and tenants against the UK sanctions list, and we are required to report any match or suspected breach to the Office of Financial Sanctions Implementation (OFSI).

We will collect and verify: identity documents (such as your passport or driving licence); proof of address; date of birth; and, for companies and trusts, details of directors and beneficial owners. For buyers and tenants, we will also ask about your source of funds and source of wealth, which may include bank statements, mortgage agreements in principle or evidence of the sale of another property.

We use Credas and Smart compliance to carry out electronic identity verification and screening against sanctions and politically exposed persons (PEP) lists. An electronic identity check leaves a 'soft footprint' on your credit file; it is not visible to lenders and does not affect your credit score. Screening may involve processing information about alleged criminal conduct (adverse media); we process this only as required by law and with appropriate safeguards in place.

If we know or suspect that money laundering or a sanctions breach may be involved, we are legally required to report this to the National Crime Agency (NCA) or OFSI. We are not permitted to tell you if we make such a report.

We keep records of these checks for 5 years after our business relationship with you ends, or after the transaction completes, as required by the Money Laundering Regulations.

7. Special category and criminal offence data

We do not routinely collect special category data (such as data about your health) or criminal offence data, but there are limited circumstances where we may do so:

- **Health and vulnerability information** you choose to share with us – for example, to request adjustments, report accessibility needs or help us tailor our services. We process this with your **explicit consent** and only use it for the purpose for which you provided it.
- **Criminal offence data** where it is required for tenant or guarantor referencing, for property licensing (for example, 'fit and proper person' assessments), or where it arises from the AML and sanctions screening described in section 6 (adverse media). We process this data only where the law allows, relying on the relevant conditions in the Data Protection Act 2018 .

We apply additional safeguards to this data, including stricter access controls, and we never use it for marketing.

8. Who do we share your personal data with?

We share personal data with trusted third parties so that we can deliver our services, run our business efficiently and comply with the law. Depending on your relationship with us, these include:

- **Property portals** such as Rightmove, Zoopla and OnTheMarket, to market properties.
- **Solicitors and conveyancers** acting for the parties in a sale or purchase, including via the memorandum of sale.
- **Referencing and identity verification providers** Goodlord, Credas, Smart Compliance, including credit reference agencies, to reference tenants and guarantors and to complete the checks in section 6.
- **Tenancy deposit protection schemes** TDS, FlatFair, Reposit, DPS and My Deposits to protect deposits as required by law.
- **Contractors and tradespeople** (for example, plumbers, electricians, gas engineers, EPC assessors, inventory clerks and photographers) to maintain, certify and market properties.
- **Landlords and tenants:** we share relevant details between the parties to a tenancy, and between buyers and sellers, so far as needed to progress and manage the transaction or tenancy.
- **Utility providers, council tax departments and water companies**
- **Regulators and authorities** including HMRC, the NCA, OFSI, local authorities (for example, for licensing) and the police, where we have a legal obligation.
- **Financial services partners:** we will only refer you to a mortgage broker, surveyor or insurance provider with your consent, and we will tell you about any referral fee we receive.
- **Our business suppliers,** including our CRM and property management software, Street, client accounting software, PayProp, repairs and maintenance reporting e.g. Street, deposit management TDS, FlatFair, DPS and My Deposits, inventory software

InventoryBase, Keywhere, Microsoft, Dropbox, accountants, marketing agencies and web hosts.

Artificial intelligence

We use an AI-assisted property management tool, to help authorised staff manage enquiries, communications, property records and routine administrative tasks. Alven may process relevant information held within Street, Microsoft 365 and approved connected systems. The AI platform acts as a processor on our behalf, and its outputs and proposed actions are subject to staff review. We do not use the AI platform to make solely automated decisions that have a legal or similarly significant effect on individuals. You can find out more about how Alven processes your personal data in their privacy notice here:

<https://alven.ai/data-management-policy>

We use Payprop as a third-party payment processor. We do not store your card details. You can find out more about how PayProp processes your personal data in their privacy notice here [Data Protection and Privacy Policy | PayProp](#).

We have Data Processing Agreements in place with our Data Processors, and we never sell personal data to third parties.

International transfers

Where personal data is transferred outside the UK, we ensure appropriate safeguards are in place, such as a UK adequacy regulation, the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses.

9. How do we communicate with you?

Non-marketing communications include service messages, tenancy and transaction updates, invoices and statements, safety certificates, notices, answers to enquiries and other communications needed to deliver our services. These are not marketing, and you will receive them even if you opt out of marketing.

We record telephone calls for training, quality, and compliance purposes, under our **legitimate interest**.

Marketing communications and property alerts

If you join our marketing list or sign up for property alerts, we will collect your name, contact details and property requirements so that we can send you emails or SMS about properties, services and content we hope you will find useful.

- **Business clients (for example, corporate landlords and developers):** we rely on our **legitimate interest** to send you marketing messages, unless you have opted out.
- **Consumers (including individual landlords, tenants, buyers and sellers):** we will only send you marketing messages with your **consent**, or where the 'soft opt-in' applies (that is, where you have bought or enquired about similar services from us and were given the opportunity to opt out at the time).

You are welcome to unsubscribe at any time using the link in our messages or by contacting us at Hello@llcoproperty.com. If you opt out, we will add you to a suppression list to make sure we do not contact you in error.

10. How long do we keep your personal data for?

We keep personal data for no longer than we need it. Our standard retention periods are:

- **AML, identity and sanctions check records:** 5 years after the end of our business relationship or the completion of the transaction, as required by the Money Laundering Regulations 2017.
- **Right to rent check records:** for the duration of the tenancy and for 1 year after the tenant leaves the property.
- **Tenancy files and sales files:** for the duration of the tenancy or transaction and then for 7 years, in case of legal claims.
- **Financial and client account records:** 7 years, in accordance with HMRC requirements.
- **Marketing list and property alerts:** until you opt out, at which point we move your details to a suppression list.
- **Enquiries and applications that do not proceed:** 12 months after our last contact with you.
- **Cookie data:** in line with our Cookie Policy and the choices you make on our Cookie Consent Management Platform.
- **CCTV footage:** 30 days, unless it is needed for an investigation.
- **Call recordings:** 30 days
- **Accident book records:** 3 years from the date of the incident, in line with our legal obligations.

11. How do we protect your personal data?

We take appropriate technical and organisational measures to keep your personal data secure, including:

- Secure servers, encryption and password-protected systems with multi-factor authentication.
- Restricted staff access on a need-to-know basis, and regular staff training.
- Secure storage and confidential disposal of paper records.
- Regular audits and compliance checks.

12. How do we process your personal data?

So that we can provide a service to you, we need to process some of your personal data. We make sure that we only collect what we need. Please select the section below which best describes your relationship with our organisation to find out more – you may fall into more than one category. Sections 1–11 above apply to everyone.

Personal data relating to our staff and job applicants is covered by a separate internal privacy notice.

I am a visitor to your website

We use cookies on our website which collect various types of personal data. This will include details about your visits to our website: page views, downloads, navigation and exit; IP address; geographical location; browser type and version; operating system; referral source; and length of your visit.

Some of these cookies are necessary to ensure that the website works correctly, and other cookies require your **consent**. You can find out more about our cookies, and manage your consent, in our Cookie Policy here [Cookie Policy - Lang Llewellyn](#).

If you send us an enquiry via our website, a portal (such as Rightmove or Zoopla) or by phone or email, we will collect your name, contact details and details of the property you are interested in. It is in our **legitimate interest** to do so, so that we can respond to your enquiry. If you sign up for property alerts, see section 9.

Our website may contain links to external websites, including portals and financial services providers. We are not responsible for the practices, policies or content of such websites and suggest that you check their privacy notices.

Social media

We use Facebook, X (formerly Twitter), Instagram, LinkedIn and YouTube. We sometimes use paid advertising on these platforms, but we will only use custom audiences (which involves sharing your contact details with the platform in a protected form) with your **consent**. You can find a copy of this Privacy Notice on our Facebook page in the 'About' section.

I am a landlord

We will process your name, contact details, bank details and details of your property so that we can market and let your property, collect rent and manage the tenancy under our **contract** with you.

We will verify your identity and your ownership of the property (for example, via HM Land Registry) and carry out the AML and sanctions checks described in section 6, under our **legal obligation**.

We are required by law to share certain information with your tenants, including your name and an address for service. If you live outside the UK, we may be required to deduct tax from your rental income or share information with HMRC under the Non-Resident Landlord Scheme.

We share your data with contractors and certification providers (for example, gas engineers, electricians and EPC assessors) to keep your property compliant, with the tenancy deposit scheme, with the local authority where licensing applies, and with your tenants so far as needed to manage the tenancy.

I am a tenant, or applying to rent

When you apply for a tenancy, we will process your name, contact details, date of birth, and employment and income details, because you are taking steps to enter into a **contract** with the landlord.

We use GoodLord to reference you. This includes a credit check, and references from your employer and previous landlord. If a guarantor is required, they will be referenced in the same way. Referencing checks normally leave only a 'soft footprint' on your credit file and do not affect your credit score.

We must check that you have the right to rent in England before your tenancy starts. This means we will take copies of your passport or immigration documents and Share code, under our **legal obligation**. We will also carry out the sanctions checks described in section 6.

During your tenancy, we will process data about rent payments, repairs, inspections and correspondence to manage the tenancy. We share your contact details with contractors so that they can arrange access for repairs and safety checks, and with your landlord so far as needed to manage the tenancy. Your deposit will be protected with either the TDS, Reposit or Flatfair and we share your details with the scheme as required by law.

We will notify utility providers and the council tax department when you move in and out. If rent arrears arise or there is a dispute, we may share your data with debt collection agencies, tracing agents or legal advisers under our **legitimate interest** in recovering sums owed.

If you share health or vulnerability information with us (for example, to request adjustments or report accessibility needs), we will only use it for that purpose and in line with data protection law.

I am a guarantor

If you agree to act as guarantor for a tenant, we will process your name, contact details, date of birth and financial details so that you can enter into the guarantee agreement (**contract**). We will reference you via GoodLord, including a credit check, and carry out identity and sanctions checks where required. We share your details with the landlord and the referencing provider and may contact you during the tenancy about matters covered by your guarantee.

I am selling a property

We will process your name, contact details and details of your property so that we can market and sell your property under our **contract** with you. We will verify your identity and your ownership of the property and carry out the AML and sanctions checks described in section 6, under our **legal obligation**.

We advertise your property on our website, on property portals and on social media. Marketing materials (photographs, video tours and floor plans) are taken with care to avoid personal items; please tell us if you have any concerns about what they show.

We will pass on viewing feedback and offers to you. When you accept an offer, we will share your details with your conveyancer and the buyer's conveyancer via the memorandum of sale, so that the transaction can proceed.

I am buying, or interested in buying, a property

When you enquire about or view a property, we will collect your name, contact details and property requirements under our **legitimate interest** in responding to you and arranging viewings. We pass viewing feedback to the seller.

If you make an offer, we will ask about your buying position, proof of funds and any mortgage agreement in principle, so that we can verify your offer for the seller. When your offer is accepted, we must complete the AML and sanctions checks described in section 6, including source of funds, under our **legal obligation**. We will share your details with your conveyancer and the seller's conveyancer via the memorandum of sale.

We will only refer you to a mortgage broker, surveyor or other financial services partner with your **consent**, and we will tell you about any referral fee we receive.

I am a referee, emergency contact or other third party

We may process your contact details if they are given to us by someone else – for example, if you are named as an employer or previous landlord for a reference, as an emergency contact or next of kin, as a joint owner, or as a director or beneficial owner of a corporate client. We process this data under our **legitimate interest** or legal obligation, for beneficial owners and will only use it for the purpose for which it was provided.

I am a contractor or supplier

We will process your name, contact and payment details so that we can instruct you and pay your invoices under our **contract** with you. We share your contact details with tenants, landlords and occupiers so that access can be arranged for works, under our **legitimate interest**. We may also hold copies of your insurance and qualification certificates to meet our compliance obligations.

I am visiting your office (or branch)

If you have an accident on our premises, we will record your name, contact details and details of the accident in our Accident Book, to comply with our **legal obligation**.