Privacy Policy

Last updated: October 2026

This Privacy Policy explains how **Hewitt Land and Commercial Ltd** ("we", "us", "our") collects, uses, shares and protects personal information in connection with our commercial property agency, land, valuation and advisory services, and our website www.hewitt-land-commercial.co.uk.

It applies to:

- our clients and their representatives
- prospective buyers, tenants and occupiers
- landowners, sellers and landlords
- other parties to transactions we are involved in, and their advisers
- people who contact us or receive property information from us
- visitors to our website

We are committed to complying with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003 (PECR), as amended from time to time.

1. Who we are

Hewitt Land and Commercial Ltd
Registered in England and Wales, company number 16736040
Registered office: 167–169 Great Portland Street, 5th Floor, London, W1W 5PF
ICO registration reference: ZC001182
Email: th@hewitt-land-commercial.co.uk
Website: www.hewitt-land-commercial.co.uk

We are the controller of the personal data described in this policy. This policy covers work carried out by Hewitt Land and Commercial Ltd only.

2. Personal data we collect

Information you give us

- name, company name and job title
- contact details, such as email address, telephone number and postal address
- property requirements, enquiry details and information about transactions
- identity and verification documents and information needed for anti money laundering (AML) and sanctions checks, such as proof of identity and address and, where relevant, information about beneficial ownership and source of funds
- correspondence, and notes of calls and meetings
- details needed to invoice you or receive payment

Information we receive from other sources

Much of the personal data we handle comes from people other than the individual concerned. We may receive or obtain information from:

- our clients, joint agents, introducers and referrers
- solicitors and other professional advisers acting in a transaction

- public registers and sources, such as HM Land Registry, Companies House, local planning authority records and the business rates valuation list
- property portals and listing services
- identity verification and sanctions screening providers
- publicly available sources, such as company websites and professional networking sites

Information collected automatically

When you use our website, we may collect your IP address, device and browser information, pages viewed and usage information, and cookie data (see section 10).

Sensitive information

We do not seek to collect special category data, such as information about health, religion or ethnicity. AML and sanctions checks may reveal information about criminal offences or whether someone is a politically exposed person. We process this only where needed to comply with our legal obligations, and in line with the conditions in the Data Protection Act 2018.

3. How we use your information and our lawful basis

We use personal data for the purposes below. The table shows the lawful basis under UK GDPR that we rely on for each.

Purpose	Lawful basis
Responding to enquiries and providing information about properties	Legitimate interests Contract, where you ask us to take steps before entering into an agreement
Providing our services, including marketing properties, arranging viewings, negotiating and progressing transactions, and providing valuations and advice	Contract, for our clients Legitimate interests, for other parties to a transaction
Carrying out AML, identity and sanctions checks, and keeping the records the law requires	Legal obligation
Sending property particulars, availability and market updates (see section 4)	Legitimate interests Consent, where the law requires it
Running our business, including accounts, invoicing, insurance, handling complaints, and establishing or defending legal claims	Legal obligation Legitimate interests
Complying with professional standards that apply to us, including those of RICS	Legal obligation Legitimate interests
Operating and improving our website	Legitimate interests Consent, for non essential cookies

Our legitimate interests are running and promoting a commercial property business and handling transactions effectively. We only rely on them where they are not overridden by your rights and interests.

Where we need information to meet a legal requirement, such as AML checks, we cannot act for you or proceed with a transaction if it is not provided.

4. Property particulars and marketing

We send property particulars, availability and market updates by email to people we reasonably believe have a professional interest in commercial property, such as agents, investors, developers, occupiers and landowners.

- **Business contacts at companies and other corporate bodies:** for people contacted at a limited company, LLP, public body or other corporate body, we send these under our legitimate interests. PECR permits this for corporate email addresses without prior consent.
- **Individuals, sole traders and partnerships:** we only send electronic marketing where you have consented, or where you have been in contact with us about our services, we are telling you about similar services, and you have had a simple way to opt out each time.

Every marketing email identifies us and includes a simple way to unsubscribe. You can object at any time by replying to the email or contacting us at th@hewitt-land-commercial.co.uk. We keep a record of people who have opted out so that we do not contact them again.

5. Use of artificial intelligence and technology tools

We use AI tools, currently including Anthropic's Claude, Microsoft Copilot and Wispr Flow (voice dictation), to help us review documents, draft correspondence and reports, transcribe dictation and organise information. When we use these tools, personal data contained in documents or correspondence may be processed by them.

- All work produced with the help of AI tools is reviewed by a person at Hewitt Land and Commercial Ltd before it is issued.
- We do not use AI tools to make decisions about you, and we do not carry out automated decision making that produces legal or similarly significant effects.
- We limit the personal data we put into these tools to what is needed for the task.
- Where a provider offers settings that stop our data being used to train its models, we use them.

6. Who we share your information with

We share personal data only where necessary, with the following categories of recipient:

- other parties to a transaction and their advisers, such as solicitors, surveyors, accountants, joint agents, buyers, tenants, sellers and landlords, to the extent needed to progress the matter
- identity verification, AML and sanctions screening providers
- IT, email, cloud storage, software and website hosting providers, including Microsoft
- AI tool providers, as described in section 5
- property portals and listing services, when we market a property
- our professional indemnity insurers, insurance brokers and legal advisers, where needed to notify or defend a claim
- HMRC, the National Crime Agency, law enforcement, regulators (including RICS and the ICO) and courts, where we are required or permitted by law

Where we make a report under anti money laundering law, we may be legally prohibited from telling you.

We will **never sell or trade** your personal data.

7. International transfers

Some of our service providers, including AI, cloud and software providers, are based in or process data in the United States and other countries outside the UK. Where personal data is transferred outside the UK, we rely on safeguards recognised under UK law, such as UK adequacy regulations (including the UK Extension to the EU–US Data Privacy Framework, where the provider is certified), the ICO's International Data Transfer Agreement, or the UK Addendum to the EU standard contractual clauses. You can contact us for more information about the safeguards that apply.

8. Data security

We take appropriate technical and organisational measures to keep personal data secure, including restricted access, password protection and encryption where appropriate. If a personal data breach occurs, we will notify the ICO and affected individuals where the law requires us to.

9. How long we keep your information

We keep personal data only for as long as necessary for the purposes it was collected for. Our typical retention periods are:

Type of record	Retention period
General enquiries and contacts with no transaction	Up to 3 years after last contact
Marketing contact details	Until you unsubscribe or object. We keep a minimal record of opt outs so we can honour them
AML, identity and sanctions records	5 years after the end of the business relationship or transaction, then deleted unless the law requires longer or you agree
Client and transaction files, agency agreements and fee records	6 years after the instruction or transaction ends
Valuation and advisory files	Up to 15 years after the work is completed, because negligence claims can be brought up to 15 years later

10. Cookies

Our website uses cookies that are essential for it to work, such as those that enable navigation and contact forms. Where we use analytics or other non essential cookies, we will ask for your consent where the law requires it, and you can change your choices at any time. You can also control or delete cookies through your browser settings.

11. Your rights

Under UK GDPR you have the right to:

- request access to the personal data we hold about you
- ask us to correct inaccurate or incomplete data
- ask us to delete your data
- ask us to restrict how we use your data
- object to our use of your data, including for marketing
- ask us to transfer your data to another organisation
- withdraw your consent at any time, where we rely on consent
- complain to the Information Commissioner's Office (ICO)

Some of these rights are not absolute. For example, we cannot delete AML records before the end of the period the law requires us to keep them.

To exercise your rights, contact th@hewitt-land-commercial.co.uk. We will respond within one month. We may extend this by up to two further months for complex requests, and will tell you if we do. There is normally no charge. We may need to confirm your identity before responding.

Complaints

If you are unhappy with how we have handled your personal data, please contact us first so we can try to put things right. You also have the right to complain to the ICO:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113
Website: ico.org.uk

12. Third party links

Our website may contain links to third party websites. We are not responsible for these websites or their privacy practices.

13. Changes to this policy

We may update this Privacy Policy from time to time. Any changes will be posted on our website with an updated date.

14. Contact us

For any questions about this Privacy Policy or how we handle your personal data, please contact:

Hewitt Land and Commercial Ltd
Email: th@hewitt-land-commercial.co.uk
Website: www.hewitt-land-commercial.co.uk