LIBERATE
HOMES

Privacy Notice and Referral Fee Disclosure

For sellers, buyers, applicants, website users, suppliers and other contacts

Important consumer disclosure

This document is both a UK GDPR privacy notice and a written disclosure of referral arrangements connected with estate agency services. Referral services are optional. You do not have to use any broker, solicitor/conveyancer or surveyor recommended by us.

You are free to shop around and use your own mortgage broker, solicitor/conveyancer or surveyor. We will not discriminate against you, delay your transaction, reduce our service, or treat your offer or instruction less favourably because you choose not to use a recommended service.

1. Who we are

Liberate Homes Limited is the controller of the personal data described in this notice. Our registered office is 05 Dubai Suite Ground Floor Prospect House, Columbus Quay, Riverside Drive, Liverpool, Merseyside, L3 4DB.

Privacy contact: sales@liberatehomes.co.uk | 0330 223 8001.

A formal Data Protection Officer has not been appointed because, based on the current nature of our activities, one is not required. Privacy queries should be sent to the privacy contact above.

We are a member of The Property Ombudsman. Registration number: E03283.

2. Scope of this notice

This notice explains how we collect, use, store and share personal data when we provide residential estate agency services, operate our website, communicate with you, comply with legal duties and manage referral arrangements. It applies to sellers, prospective sellers, buyers, prospective buyers, viewers, offerors, applicants, occupiers, guarantors, suppliers, contractors, employees, job applicants and professional contacts.

3. Personal data we collect

Category	Examples
Identity and contact data	Name, address, email, telephone number, date of birth, proof of identity, signatures and correspondence details.
Property and transaction data	Property address, valuation, asking price, viewing history, offers, memoranda of sale, sales progression notes, chain details and completion information.
Financial and affordability data	Source of funds, proof of funds, mortgage decision in principle, bank details where needed, payment records and financial information needed for AML or transaction checks.
AML and compliance data	Identity verification documents, sanctions/PEP screening results, beneficial ownership information, risk assessments and statutory compliance records.
Special category or sensitive data	Information such as health, accessibility needs, vulnerability, family circumstances or criminal offence information where relevant and lawful, for example to make reasonable adjustments, protect people, or comply with law.
Website and technical data	IP address, device details, browser type, cookie identifiers, session information, security logs and website usage information.

Category	Examples
Marketing and preferences	Your communication preferences, property requirements, marketing opt-ins and opt-outs.
Staff and recruitment data	Application forms, CVs, right to work checks, employment records, payroll and HR records where relevant.

4. Sources of personal data

- You, when you contact us, instruct us, view a property, make an offer, register property requirements, use our website or provide documents.
- Sellers, buyers, landlords, tenants, other occupiers, family members, representatives, solicitors, mortgage brokers, surveyors, referencing providers and other professional advisers involved in a transaction.
- Public registers and official sources, including HM Land Registry, Companies House, HMRC, sanctions lists, electoral register sources, credit reference or identity verification providers where lawful.
- Our website, CRM systems, email systems, telephone systems, CCTV if applicable and property portals or advertising platforms.

5. Purposes and lawful bases

Purpose	Types of data	Lawful basis
Providing estate agency services, arranging valuations, marketing property, viewings, offers, sales progression and communication	Identity, contact, property, transaction and communication data	Contract or steps before a contract; legitimate interests in providing and improving estate agency services.
Verifying identity, completing AML checks, sanctions checks and fraud prevention	Identity, financial, AML and compliance data	Legal obligation; substantial public interest where special category or criminal offence data is involved; legitimate interests in fraud prevention.
Preparing records, memoranda of sale and liaising with solicitors, brokers, surveyors and other parties	Identity, contact, transaction and property data	Contract; legitimate interests; legal obligation where applicable.
Managing referral arrangements and introducing optional services	Identity, contact, transaction and referral data	Consent where we pass your details to the referred provider; legitimate interests in operating transparent referral arrangements; contract where applicable.
Responding to enquiries, complaints and legal claims	Identity, contact, communications and transaction data	Legitimate interests; legal obligation; establishment, exercise or defence of legal claims.
Marketing our services and sending property updates	Contact, preferences and property requirements	Consent for electronic direct marketing where required; legitimate interests for limited business communications where lawful; opt-out always available.
Website operation, security and cookies	Technical, cookie and usage data	Legitimate interests for essential security and functionality; consent for non-essential cookies where used.
Employment, recruitment and supplier management	Identity, contact, HR, payment and supplier data	Contract; legal obligation; legitimate interests.

6. Special category and criminal offence data

We will only process special category data or criminal offence data where we have a lawful basis under UK GDPR and the Data Protection Act 2018. This may include explicit consent, substantial public interest, legal claims, employment law obligations, safeguarding, anti-money laundering checks or making reasonable adjustments for vulnerable or disabled consumers.

7. Sharing personal data

We only share personal data where lawful and necessary. Recipients may include:

- buyers, sellers and their authorised representatives where needed for the transaction;
- solicitors/conveyancers, mortgage brokers, surveyors, valuers, contractors, property portals, photographers, EPC providers and other professionals involved in estate agency services;
- Michael Niven Financial Services, an appointed representative of Capital Finance Brokers Limited, where you consent to a mortgage or protection referral;

- Broker Conveyancing, a trading style of Conveyancing Alliance Limited, where you consent to a solicitor/conveyancer or surveyor referral;
- identity verification, AML, sanctions screening, CRM, website, IT, hosting, email, telecoms, accounting and payment service providers;
- HMRC, HM Land Registry, law enforcement, regulators, redress schemes, courts, tribunals, insurers and professional advisers where required or appropriate.

8. Referral fee and connected business disclosure

Referral services are optional

We may recommend third-party or associated services. You do not have to use them. You may shop around and choose your own mortgage broker, solicitor/conveyancer or surveyor. We will not discriminate against you, delay your transaction, reduce our service, or treat your offer or instruction less favourably because you decline a referral.

Service	Provider/relationship	What we may receive
Mortgage brokerage	Michael Niven Financial Services, an appointed representative of Capital Finance Brokers Limited. This mortgage brokerage arrangement is connected to our business because it is also owned/controlled by Michael Niven.	Liberate Homes Limited is paid around 25% of the profit made by the mortgage brokerage from the referred consumer/client case. This is a realistic estimate of the value to our business. The exact amount will depend on the profit generated by that case.
Solicitor/conveyancer referral	A panel offered via Broker Conveyancing, a trading style of Conveyancing Alliance Limited.	Liberate Homes Limited is paid between £50 and £300 for referring a consumer/client to a solicitor/conveyancer through the panel.
Surveyor referral	A panel offered via Broker Conveyancing, a trading style of Conveyancing Alliance Limited.	Liberate Homes Limited is paid between £25 and £100 for referring a consumer/client to a surveyor through the panel.

We will disclose referral arrangements in writing before you make a transactional decision about whether to use the referred service. Where the exact fee is not known in advance, we will provide the basis of calculation or a realistic estimate. If the exact amount becomes known and is materially different from the estimate, we will provide an updated disclosure as soon as reasonably practicable.

Where a referred provider is regulated, that provider is responsible for its own advice, terms, fees, regulatory disclosures and privacy information. We are not responsible for the professional advice given by independent providers.

9. Cookies and website technologies

Our website uses the following categories of cookies and similar technologies:

- Session and Security Cookies - used to keep sessions secure and protect the website from misuse.
- Load Balancing and Content Delivery (CDN) Cookies - used to keep the website available, stable and fast.
- Core Functional and State-Saving Cookies - used to remember basic website choices and preserve essential functionality.
- Cookie Consent Storage - used to remember your cookie choices.

These cookies are intended to support website security and core functionality. If we introduce analytics, advertising, remarketing or other non-essential cookies, we will update this notice and request consent where required.

10. International transfers

We do not knowingly use processors that transfer personal data outside the United Kingdom. If this changes, we will update this notice and ensure an appropriate UK GDPR transfer safeguard is in place before the transfer takes place.

11. Retention schedule

Record type	Retention period
Anti-Money Laundering (AML) records	Minimum 5 years.
General transaction and estate agency records	Minimum 6 years.
Tax and accounting records	6 years plus the current financial year.
Employee/HR records	6 years after employment ends, unless a longer or shorter period is required for a specific record type.

Record type	Retention period
UK GDPR / personal data generally	Kept no longer than necessary for its lawful purpose. Specific records may be kept for the periods above where needed for legal, regulatory, contractual, tax, accounting, complaints or claims purposes.

12. Security

We use appropriate technical and organisational measures designed to protect personal data against unauthorised or unlawful processing, accidental loss, destruction or damage. Measures may include access controls, password protection, secure storage, staff training, supplier checks, restricted permissions and secure deletion or disposal.

13. Your rights

Depending on the circumstances and lawful basis, you may have the right to:

- be informed about how your data is used;
- access your personal data;
- rectify inaccurate data;
- request erasure;
- restrict processing;
- object to processing;
- data portability;
- withdraw consent where processing is based on consent;
- complain to the Information Commissioner's Office.

To exercise your rights, contact sales@liberatehomes.co.uk. We may need to verify your identity before responding.

14. Complaints

Please contact us first if you have a complaint about how we use your personal data. You can contact us at sales@liberatehomes.co.uk or 0330 223 8001. You also have the right to complain to the Information Commissioner's Office at ico.org.uk.

For estate agency service complaints, our approved redress scheme is The Property Ombudsman. Registration number: E03283.

15. Automated decision-making and profiling

We do not make decisions based solely on automated processing that produce legal or similarly significant effects on you. If this changes, we will update this notice and provide the information required by law.

16. Updates to this notice

We may update this notice from time to time. The latest version will apply from the date shown in the footer or on the published document. Material changes will be highlighted where appropriate.

17. Publication checklist completed

Item	Confirmed information
Mortgage brokerage company and FCA details	Michael Niven Financial Services, an appointed representative of Capital Finance Brokers Limited. FCA firm reference number: 943805.
Solicitors/conveyancers and surveyors	Referrals come from a panel offered via Broker Conveyancing, a trading style of Conveyancing Alliance Limited.
Approved redress scheme	The Property Ombudsman; registration number E03283.
Cookie list	Session and Security Cookies; Load Balancing and Content Delivery (CDN) Cookies; Core Functional and State-Saving Cookies; Cookie Consent Storage.
International transfers by processors	No processors transfer data outside the UK.
Retention schedule	AML: minimum 5 years; estate agency records: minimum 6 years; tax/accounting: 6 years plus current financial year; HR: 6 years after employment ends; personal data: no longer than necessary.
Data Protection Officer	A formal DPO has not been appointed because one is not required for the current activities.