

Data Protection & GDPR Policy

Peter Clarke in association with Winkworth t/a Winkworth Stratford upon Avon / Wellesbourne / Shipston on Stour / Chipping Campden / Leamington Spa
Data Protection Manager – Barney Smith

It is essential for every employee or representative of the Company to review this policy to ensure the policy is understood, maintained and implemented.

What is GDPR?

The GDPR (General Data Protection Regulation) i.e. the Data Protection Act 2018 is concerned with respecting the rights of individuals when processing their personal information. The regulation is mandatory and all organisations that hold or process personal data must comply. All staff have a continuing and fundamental responsibility to ensure their activities comply with these data protection principles and this Data Protection Policy. Line managers have responsibility for the type of personal data they collect and how they use it. Staff should not disclose personal data outside the organisation's policies and procedures, or use personal data held on others for their own purposes without consent.

Winkworth Policies	
Privacy Policy	The lawful basis for processing is set out in the Winkworth Privacy Policy which can be reviewed via the following link https://www.winkworth.co.uk/privacy-policy If you are unclear as to the lawful purpose for your use of the personal data, then contact your Data Protection Manager before processing such personal data.
Retention Policy	The retention periods are set out and maintained in accordance with the Winkworth Retention Policy which is available via this link https://www.winkworth.co.uk/retention-policy
Cookie Policy	The Winkworth Cookie Policy outlines all the types of cookies we collect from our website users, what they are for and why we collect them which is available via this link https://www.winkworth.co.uk/cookie-policy
For a copy of any of the below policies, please contact Barney Smith	
Breach Notification Policy	The Winkworth Breach Policy sets out the steps we take to ensure all breaches are dealt with appropriately. See the combined flow chart & risk assessment form - HERE See the Breach notification Policy and Procedure - HERE
Data Subject Access Request Policy	The Winkworth Data Subject Access Request Policy sets out the steps we take to ensure all breaches are dealt with appropriately. See the Data Subject Access Request Policy and Procedure - HERE All Data Subject Access requests should be sent to www.winkworth.co.uk/data-request to complete the form.
Marketing Communication Policy	The Winkworth Marketing Communications Policy sets out the steps we take to ensure all marketing communications are sent in accordance with the Data Protection Legislation. See the Marketing Communications Policy - HERE
Marketing Lists Policy	The Winkworth Marketing Lists Policy sets out the steps we take to ensure our marketing lists are handled in accordance with the Data Protection Legislation. See the Marketing Lists Policy - HERE

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Information Security Policy	The Winkworth Information Security Policy sets out the steps we take to ensure IT security within offices is in accordance with the Data Protection Legislation. See the Winkworth Information Security Policy - HERE
Training Policy	The Winkworth Training Policy sets out the training that staff and representatives of Winkworth are required to undertake to ensure all handling of personal data is compliant with The Data Protection Act 2018 and Winkworth's requirement to follow good industry practices. See the Winkworth Training Policy - HERE
Third Party Supplier Policy and Procedure	The Winkworth Third Party Supplier Policy sets out how we ensure we only use third party suppliers who provide sufficient guarantees to implement technical and organisational measures in such a manner that processing any personal data we provide to them will meet the requirements of The Data Protection Act 2018. See the Winkworth Third Party Supplier Policy – HERE

Policy Information	
Scope of policy	This policy applies to all employees and representatives of the Company.
Policy operational date	25.8.2026
Policy prepared by	Barney Smith
Policy review date	Two years