THE AUCTION COMPANY (UK) LTD

Privacy Notice

Version 2.0 · Effective 23 November 2026

Document	Website Privacy Notice
Version	2.0
Status	Approved by Ray Purchase, Managing Director.
Effective date	23 November 2026
Supersedes	Privacy Policy dated 21 November 2022

This privacy notice explains how The Auction Company (UK) Ltd collects and uses personal data about you, whether you are a seller, buyer, bidder, enquirer or visitor to our website. We may update it from time to time; the version number and effective date above show when it was last updated. It should be read alongside our Cookie Policy, Website Terms of Use and Acceptable Use Policy.

Our website links to other websites that we do not run, including our online auction platform at auctions.theauctioncompany.co.uk, which is provided by EIG and has its own terms, privacy and cookie information. We are not responsible for the content or privacy practices of other websites.

1. Who we are

For the purposes of the UK General Data Protection Regulation (**UK GDPR**) and the Data Protection Act 2018 (**DPA 2018**), the data controller is **The Auction Company (UK) Ltd** (**TAC**, **we**, **us**), a company registered in England and Wales under company number 12043088.

- **Registered office and trading address:** 5 Regent Street, Rugby, Warwickshire, CV21 2PE
- **Email:** compliance@theauctioncompany.co.uk | **Telephone:** 0333 207 2707
- **Data Protection Lead:** Ray Purchase, Managing Director – ray@theauctioncompany.co.uk
- **ICO registration:** We are registered with the Information Commissioner's Office under registration reference ZC310180.

Questions about this notice or your personal data can be sent to our Data Protection Lead or to compliance@theauctioncompany.co.uk.

2. What information we collect

- Full name and contact details (telephone number, email and postal address).
- Identity and verification information we are required by law to collect under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, as amended (**MLR 2017**), such as identity documents, proof of address, the results of electronic identity, politically exposed person (PEP) and sanctions checks, and evidence of the source of funds and wealth.
- Information about your close connections where we need it to identify and manage conflicts of interest under our regulatory obligations.
- Bidding and registration information, such as bidder registration details, proxy and telephone bidding forms, online auction account details, bid history and deposits.
- Bank and payment details where needed, for example when you pay a deposit or fees or we return money to you. Card payments are processed by Opayo through the EIG auction platform.
- Information about access needs that helps us find suitable properties or support you, which may include details of a disability or other health information (special category data).
- Your areas of interest and marketing preferences, where we send you marketing about similar properties and services.
- Recordings of telephone calls with us (see section 5).
- Your communications with us, including emails, messages and notes of calls.

- Information about how you found and use our website, such as the web page or campaign that brought you to us, and the pages and links you use. See our Cookie Policy for details.
- Technical information, including your IP address, browser type and version, device type and operating system.

Where we need personal data by law (for example, to meet our obligations to prevent fraud and money laundering) or under a contract with you, and you do not provide it, we may not be able to provide our services. If so, we will tell you at the time.

We also receive personal data from other sources, including estate agents who refer you to us, solicitors, the online auction platform, our ID and AML check providers, and public registers such as HM Land Registry and Companies House.

3. Why we use your information and our lawful bases

What we use it for	Lawful basis
Providing our auction and property services, including taking instructions, marketing properties, registering bidders, running auctions and progressing sales	Performance of a contract with you, or steps at your request before entering into one; our legitimate interests in running our business
Verifying your identity, preventing fraud and money laundering, and checking source of funds	Legal obligation (MLR 2017). Any information about criminal offences revealed by these checks is handled under the conditions in Schedule 1 to the DPA 2018
Keeping accounting and tax records, and responding to regulators, the courts and law enforcement	Legal obligation
Communicating with you about your enquiry, instruction or purchase, and about changes to our services	Contract; legitimate interests
Recording telephone calls (see section 5)	Legitimate interests
Sending you electronic marketing about our services	Consent, or for existing customers, our legitimate interests in marketing similar services (you can unsubscribe at any time)
Understanding which campaigns and pages bring enquiries to us, and improving our website and services	Legitimate interests; consent where the law requires it for cookies and similar technologies (see our Cookie Policy)
Keeping our website and systems secure, and preventing misuse	Legitimate interests
Using information about your health or access needs to support you	Your explicit consent
Establishing, exercising or defending legal claims and handling complaints	Legitimate interests; legal obligation

Where we rely on legitimate interests, we balance our interests against yours, taking into account what you were told, what you would reasonably expect and the impact on you. In rare cases we may also process data to protect someone's vital interests or where needed in the public interest.

4. Marketing

We will only send you electronic marketing where you have agreed to it or, if you are an existing customer, about our own services similar to those you have used or enquired about. Every message will include a simple way to unsubscribe, and you can opt out at any time by emailing compliance@theauctioncompany.co.uk. You do not need to agree to marketing to use our services. We will not share your information with third parties for their own marketing without your consent.

5. Telephone call recording

Calls to and from TAC on our 3CX telephone system may be recorded. Callers to our main line hear a message telling them this before they are connected. Recordings are stored securely in our customer relationship management system, AUCTRA.

- **Why we record calls:** to keep an accurate record of instructions, offers and telephone bids; for staff training and quality; to help prevent and detect fraud; and to help resolve complaints and disputes.

- **Lawful basis:** our legitimate interests in the purposes above. Where a recording also forms part of our AML records, we may keep it to comply with our legal obligations.
- **How long we keep recordings:** 2 years from the date of the call, unless a recording is needed for a complaint, dispute, legal claim, subject access request or regulatory investigation, in which case we keep it until that matter is concluded.
- You can ask for a copy of a recording of your call by making a subject access request (section 10).

6. Who we share your information with

We share your personal data only where necessary. Some recipients act as our data processors, carrying out activities on our behalf under contract; others are separate controllers responsible for their own use of the data. They include:

- **EIG**, which provides our online auction platform and property search, including bidder registration and online bidding.
- **Opayo**, which processes card payments made through the EIG auction platform.
- **Apex Law**, solicitors we work with, where they are involved in your transaction.
- **ID and AML check providers:** Hipla (seller checks) and Landmark (buyer checks), which verify identity and carry out PEP and sanctions screening.
- **Our agents**, who work with TAC on the sale of your property or your purchase, and any estate agent who referred you to us.
- **Your solicitors and those of the other party** to your transaction.
- **Our IT and systems providers**, including AUCTRA (our customer relationship management system), Microsoft (Outlook and Microsoft 365 email and files), 3CX (telephone system and call recording) and our website hosting provider.
- **Professional advisers, auditors and insurers.**
- **Regulators and authorities** where we must by law, including HMRC (our anti-money laundering supervisor), the National Crime Agency, the police, the Information Commissioner's Office and The Property Ombudsman.

We may also disclose your personal data: if we sell or buy any business or assets, to the prospective seller or buyer; if TAC or substantially all of its assets are acquired by a third party, in which case customer data will be one of the transferred assets; and where we must do so to comply with a legal or regulatory obligation, or to protect the rights, property or safety of TAC, our customers or others, including exchanging information with other organisations to prevent fraud.

7. Transfers outside the UK

We do not ourselves send your personal data outside the UK. Some of our technology providers, such as email and cloud software providers, may store or access data outside the UK as part of their services. Where this happens, the transfer must be lawful under UK data protection law – for example, because the country is covered by UK adequacy regulations, or because appropriate safeguards are in place, such as the ICO's International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses. You can contact us for more information.

8. How we keep your data secure

We use appropriate technical and organisational measures to protect your data from unauthorised access, loss or misuse. Access to customer records is limited to our Managing Director and TAC's agents. Multi-factor authentication is used on our CRM and is being applied to all email accounts. If we have given you a username and password for any of our systems, you are responsible for keeping it confidential – please do not share it. **Always confirm bank details by phone on a number you know is genuine before sending money.**

9. How long we keep your data

Information	How long we keep it
Transaction records for buyers and sellers (instructions, contracts, bidding and sale records, correspondence)	6 years after the transaction completes or ends
Identity, AML and source-of-funds records	5 years after the transaction completes or our business relationship with you ends, as required by MLR 2017. Personal data obtained only for AML purposes is then deleted unless the law allows or requires us to keep it longer, for example where we reasonably believe it is needed for legal proceedings
Payment, accounting and tax records	6 years from the end of the financial year to which they relate
Telephone call recordings	2 years from the date of the call
Complaint records	6 years from the date the complaint is closed
Marketing preferences and contact details	Until you unsubscribe; we keep a minimal record so we do not contact you again
Website and other enquiries from people who do not become clients	Only as long as needed to deal with the enquiry and any follow-up you have asked for; we review these records at least once a year and delete those no longer needed
Website security and technical logs	Kept by our website hosting provider for a limited period for security and troubleshooting
Cookies and similar technologies	As set out in our Cookie Policy

We keep data for longer where it is needed for an open complaint, legal claim, subject access request or regulatory investigation, until that matter is concluded.

10. Your rights

You have the following rights under UK data protection law. Requests are free of charge (unless manifestly unfounded or excessive), and we will respond within one month, or tell you within that month if we need up to two further months for a complex request. We may need to verify your identity first. To exercise any right, email compliance@theauctioncompany.co.uk or ray@theauctioncompany.co.uk, or write to us at 5 Regent Street, Rugby, Warwickshire, CV21 2PE.

- **Access:** you can ask for a copy of the personal data we hold about you (a subject access request).
- **Correction:** you can ask us to correct inaccurate data or complete incomplete data.
- **Erasure:** you can ask us to delete your data where there is no good reason for us to keep it. We may not always be able to, for example where we must keep AML or accounting records by law; we will explain why.
- **Restriction and objection:** you can ask us to restrict our use of your data in certain circumstances, or object to our processing based on legitimate interests. You can object to direct marketing at any time. If we have compelling legitimate grounds that override your rights, we will tell you. Restricting or stopping processing may affect our ability to provide our services.
- **Withdrawing consent:** where we rely on your consent, you can withdraw it at any time. This does not affect processing before you withdrew it.
- **Data portability:** where we process your data by automated means based on your consent or a contract, you can ask us to send a copy to you or to another organisation in a commonly used, machine-readable format, where technically feasible.
- **Automated decisions:** you have rights relating to decisions with legal or similarly significant effects made solely by automated means, including the right to ask for a person to review the decision.

11. Complaints

If you are unhappy with how we have handled your personal data, please contact us first using the details in section 1, and we will investigate. You also have the right to complain to the UK data protection regulator, the **Information Commissioner's Office**: www.ico.org.uk, telephone 0303 123 1113.