

GIGGS & COMPANY

Privacy & Cookie Policy

Ashleigh & Jessica Limited, trading as Giggs & Company and Giggs & Co Lettings

Policy version: 16 July 2026

QUICK SUMMARY

- We only collect data necessary to provide our services
- We never sell your data
- We use trusted third-party systems (listed below)
- You have full control over your data

PART A - PRIVACY POLICY

1. Introduction

This Privacy Policy is provided by Ashleigh & Jessica Limited, trading as Giggs & Company, a company registered in England and Wales under company number 07954901, VAT number 132984401, with registered office address at 150-152 Great North Road, Eaton Socon, St Neots, Cambs, PE19 8GS ('we', 'our' or 'us') for use of our products and services including our website, and estate agency Services (Services).

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on how and why we collect, store, use and share any information relating to you (your personal data).

It also explains your rights in relation to your personal data and how to contact us or the relevant regulator in the event you have a complaint. Our collection, storage, use and sharing of your personal data is regulated by law, including under the UK General Data Protection Regulation (UK GDPR).

We are the controller of personal data obtained via the Services, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

Compliance Commitment

We regularly review our data protection practices and policies to ensure ongoing compliance with UK GDPR and industry standards.

2. What This Policy Applies To

This privacy policy relates to your use of the Services only.

The Services may link to or rely on other apps, websites, APIs or services owned and operated by us or by certain trusted third parties to enable us to provide you with Services. These other apps, websites, APIs or services may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other apps, websites or services, please consult their privacy policies as appropriate. For more information see the section 'Who we share your personal data with' below.

3. Personal Data We Collect About You

The personal data we collect about you depends on the particular activities carried out through the Services. We collect the following types of personal data:

Identity and Account Registration Data

- Your name
- Email address
- Home address
- Phone number
- Date of birth
- Bank account details
- Rent payment records
- Deposit details

Service Usage Data

Data you store online with us using the Services including your usage history or preferences:

- Property details
- Offers and negotiations
- Tenancy agreements
- Maintenance records
- Sales progression records

Location Data (when permitted)

Details of your location with a high degree of precision, collected when using the Maps function of the Services.

Automatic Data Collection

- Your activities on, and use of, the Services which reveal your preferences, interests or manner of use
- Times of use

Enquiry Data

- Your name
- Phone number
- Email address

If you do not provide personal data we ask for where it is required, including the geo-localisation services, it may prevent us from providing services and/or the Services to you.

4. Sensitive Data

Certain Personal Data we collect is treated as a 'special category' to which additional protections apply under data protection law. This is also known as 'Sensitive Data'. Where we process such Sensitive Data, we will ensure we are permitted to do so under data protection laws. For immigration status, we collect this on the basis of your consent. For Politically Exposed Person (PEP) checks, we process this data to comply with our legal obligations under anti-money laundering regulations.

Sensitive Data We May Collect

- Your immigration status (where you choose to provide it)
- Information from Politically Exposed Person (PEP) checks conducted to comply with anti-money laundering requirements

If you do not provide Personal Data we ask for where it is asked, it will prevent us from providing the Services.

5. Location Services/Data

The Services will request your consent to use location services to precisely identify your location each session (i.e. each time the Services is opened or has been placed in the background for more than 30 seconds). We require access to that data in order to ensure the security and proper functioning of its services, prevent fraud and abuse, and analyse usage trends to improve the user experience.

Technical Detail: IP Address Processing

Our systems and third-party service providers (including Google Analytics) may temporarily process IP addresses as part of service delivery, security monitoring, and anonymous usage analytics. IP addresses are not stored for marketing or profiling purposes and are processed only to the extent necessary for legitimate operational requirements.

How to Control Location Services

To withdraw your consent at any time you can turn off the localisation permissions for our website. The location services in the Services will not operate unless location services/data are generally enabled on your device. You may disable such functionality at any time by turning your device's location "off" using the device's settings app.

When you allow your device to use location services/data, data will also be collected by Google in accordance with their Privacy Policy. We exert no control over Google's Privacy Policy and we recommend that you consult their privacy policy for further information: <https://policies.google.com/privacy?hl=en-US>

6. How Your Personal Data Is Collected

We Collect Data Directly From You When You:

- Request a valuation or instruct us
- Register as a buyer or tenant
- Make an offer or apply for a tenancy
- Attend viewings
- Complete transactions

- Report maintenance issues (for landlords/tenants)
- Provide identification
- Subscribe to marketing
- Make submissions via the Services where a forum element is available

We May Also Collect Data Indirectly

We may also collect personal data indirectly through your activity while using the Services.

Additionally, we may receive personal data about you from third parties, including property portals, referencing agencies, solicitors and mortgage brokers, deposit protection schemes, maintenance platforms, AML providers, HM Land Registry, and regulatory authorities where required.

Cookies and Similar Technologies

We use cookies and similar technologies on our website. For full details on the cookies we use, their purposes, and how to manage your preferences, please see Part B of this document (Cookie Policy) below.

7. How and Why We Use Your Personal Data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

What we use your data for	Our reasons
Create and manage your registration with us	To perform our contract with you or to take steps at your request before entering into a contract.
Providing services and/or functionalities of the Services to you	To perform our contract with you; the Maps Function will use location data based on your consent.
To enforce legal rights or defend/undertake legal proceedings	To comply with our legal and regulatory obligations; for our legitimate interests to protect our business and rights.
Communications with you not related to marketing	To comply with our legal obligations; for our legitimate interests to provide the best service to you.
Protect the security of systems and data	To comply with our legal obligations; for our legitimate interests to protect systems, data, and prevent criminal activity.
Operational reasons (efficiency, training, quality control)	For our legitimate interests to deliver the best service to you.
Statistical analysis to help us manage our business	For our legitimate interests to improve and develop our services.

What we use your data for	Our reasons
Updating and enhancing user records	To perform our contract; comply with legal obligations; for our legitimate interests.
To comply with our legal and regulatory obligations	To perform our contract; to comply with legal obligations; for our legitimate interests.
Sharing data in connection with corporate transactions or restructuring	To comply with our legal obligations; for our legitimate interests to protect, realise or grow the value in our business. Information will be anonymised where possible.

8. Marketing

We intend to send you email marketing to inform you of our services such as promotions.

We will always ask you for your consent before sending you marketing communications, except where you have explicitly opted-in to receiving email marketing from us in the past, or except where you were given the option to opt-out when you initially registered and you did not do so.

How to Opt Out

You will have the right to opt out of receiving marketing communications at any time by:

- Contacting us at [Giggs marketing contact email — confirm]
- Using the 'unsubscribe' link included in all marketing emails

Our Promise

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

9. Who We Share Your Personal Data With (Our Trusted Partners)

We routinely share personal data with service providers we use to help us run our business or provide the services or functionalities in the Services, including developers, cloud storage providers and Google, Inc. for Google Maps location functionality.

We only allow service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

Our Third-Party Service Providers

Third Party Processor	Purpose
Rightmove	Viewing enquiries
Zoopla	Viewing enquiries
On The Market	Viewing enquiries

Third Party Processor	Purpose
CRM provider	CRM
Client accounting provider	Client Accounting
Property management platform	Property Management
Repairs/maintenance platform	Repairs / Maintenance
Deposit protection scheme	Holding Tenants' Deposits
AML/sanctions checking provider	AML & Sanctions
Payment provider(s)	Payments
Lead generation tool	Lead Generation
Inspections/inventory provider	Inspections and Inventories
Photographer - Jack Wilson	Photography
Conveyancing panel	Conveyancing
Mortgage broker partner	Mortgages
Accountants	Accountants
IT support provider - iDash	IT Support & Supplier
Cyber security provider	Cyber Security Services & Support
Paul Long	Social Media
Network & referral scheme, e.g. Guild of Property Professionals	Network & Referral System

We May Also Share Data With:

- External auditors (bound by confidentiality obligations)
- Professional advisors such as lawyers (bound by confidentiality obligations)
- Law enforcement agencies, courts, tribunals and regulatory bodies
- Other parties in connection with a significant corporate transaction or restructuring

We will not share your personal data with any other third party.

10. How Long Your Personal Data Will Be Kept

We retain different categories of personal data for specific periods based on legal requirements and operational necessity:

Anti-Money Laundering (AML) Records — 5 years

Identification documents, PEP checks, and related compliance records are retained for 5 years from the end of the business relationship to comply with Money Laundering Regulations 2017.

Transaction & Accounting Records — 6 years

Financial records, tenancy agreements, sale contracts, and associated documentation are retained for up to 6 years to comply with accounting obligations and to support potential legal claims.

Buyer & Tenant Enquiries — 2 years

Prospective buyer and tenant data is retained for up to 2 years from last contact to facilitate ongoing property searches and maintain service continuity.

Marketing Communications — Until withdrawn

Marketing consent and related data is retained until you withdraw consent or unsubscribe from communications.

Website Analytics & Cookies — Varies

See Part B (Cookie Policy) below for specific retention periods for different types of cookies and analytics data.

What Happens After You Close Your Account

Once you have closed your account with us, we will move your personal data to a separate database so that only key stakeholders in our business on a 'need to know basis' have access to such data.

Following the end of the applicable retention period, we will delete or anonymise your personal data.

We do not store full card details unless processed securely via regulated payment providers.

11. Transferring Your Personal Data Out of the UK

Some of our service providers (including Google Analytics and Meta Pixel) may process data outside the UK, including in the USA. Where this occurs, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs), to protect your personal data in accordance with UK data protection laws.

Legal Requirements for Data Transfers

Under UK data protection laws, we can only transfer your personal data to a country outside the UK where:

- The UK government has decided the particular country ensures an adequate level of protection (an 'adequacy regulation')
- There are appropriate safeguards in place, together with enforceable rights and effective legal remedies
- A specific exception applies under relevant data protection law

Our Safeguards

If we were to start transferring your personal data from the UK:

- To the EEA: we would rely on the adequacy finding granted by the UK to the EU under the Withdrawal Agreement.
- Outside the UK/EEA: we would rely on appropriate safeguards under the UK GDPR, such as Standard Contractual Clauses.

12. Your Rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data

The right to be provided with a copy of your personal data. We will respond to requests within one month, though this may be extended by a further two months where requests are complex. We may require proof of identity before processing your request to ensure we protect your personal data.

Correction (rectification)

The right to require us to correct any mistakes in your personal data.

Erasure (right to be forgotten)

The right to require us to delete your personal data — in certain situations.

Restriction of use

The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data.

Data portability

The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party — in certain situations.

To object to use

The right to object:

- At any time to your personal data being used for direct marketing (including profiling)
- In certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests

Not to be subject to decisions without human involvement

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. We do not make any such decisions based on data collected by the Services.

How to Exercise Your Rights

If you would like to exercise any of those rights, please email, call or write to us (see 'How to contact us' below).

When contacting us, please:

- Provide enough information to identify yourself (e.g., your full name and username)
- Let us know which right(s) you want to exercise and the information to which your request relates

13. Keeping Your Personal Data Secure

We have implemented appropriate technical and organisational security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. These include secure cloud-based systems, access controls, and, where applicable, encryption and two-factor authentication (2FA). We limit access to your personal data to those who have a genuine business need to access it.

Data Security Breach Procedures

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

14. How to Complain

Please contact us if you have any queries or concerns about our use of your information (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

Information Commissioner's Office

You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner can be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

15. Changes to This Privacy Policy

We may change this privacy policy from time to time. When we make significant changes, we will take steps to inform you, for example via the Services or by other means, such as email.

16. How to Contact Us

You can contact us by email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint. We have appointed a Data Protection Lead who is responsible for overseeing compliance with data protection laws and handling data protection queries.

OUR CONTACT DETAILS

Telephone: 01480 276888

Email: sales@giggsandco.com

Lettings – 01480 278188, lettings@giggsandco.com

Company Number: 07954901 | VAT Number: 132984401

Lettings: Company Number: 12592011 | VAT Number: 348700200

Registered Office: 150-152 Great North Road, Eaton Socon, St Neots, Cambs, PE19 8GS

PART B - COOKIE POLICY

Giggs & Company, Giggs & Co Lettings

Published: 16.7.2026 | Last Updated: 16.7.2026

Please read this cookie policy carefully as it contains important information on who we are and how we use cookies on our Services. This policy should be read together with the Privacy Policy above, which sets out who we are, how to contact us, what data is collected, how and why we collect, store, use and share personal information generally, as well as your rights in relation to your personal information and details of how to contact us and supervisory authorities if you have a complaint.

1. Cookies

A cookie is a small text file which is placed onto your device (e.g. your smartphone or other electronic device) when you use our Services. When we use cookies on our Services, you will be informed via a cookie banner when you first visit the website. Cookies help us to recognise you and your device and allow us to store some information about your preferences or past actions, including general location information derived from IP address (for more information, please see the Privacy Policy above).

For example, we may monitor how many times you use our Services, which parts of the Services you go to, location data. This information helps us to understand use of the Services by our users. Some of this data may be aggregated and, where possible, anonymised or pseudonymised, which means that we will not be able to identify you individually.

For further information on our use of cookies, including a detailed list of your information which we and others may collect through cookies, please see below.

For further information on cookies generally, including how to control and manage them, visit the guidance on cookies published by the UK Information Commissioner's Office, www.aboutcookies.org or www.allaboutcookies.org.

2. Consent to Use Cookies and Changing Settings

We will ask for your consent to place cookies or other similar technologies on your device, except where they are essential for us to provide you with a service that you have requested (e.g. to allow you to remain logged-in to the Services as you navigate within the Services and use the Services functionalities). We rely on your consent as the lawful basis for placing non-essential cookies.

You can accept or reject non-essential cookies via our cookie banner. You can also withdraw any consent to the use of cookies or manage any other cookie preferences by using the tool made available to you within the Services itself. You can then adjust sliders or untick boxes as appropriate to reflect your choice. It may be necessary to refresh or restart the Services for the updated settings to take effect.

International Data Transfers

Some cookies (e.g. Google Analytics, Meta Pixel) may involve processing data outside the UK. Where this occurs, we ensure appropriate safeguards are in place.

3. Our Use of Cookies

Cookie Name	Provider	Purpose	Type	Duration
Cloudflare bot management	Cloudflare	Supports Cloudflare's bot management and security features, distinguishing legitimate visitors from automated traffic or malicious bots. Does not store personally identifiable information.	Essential — no consent required	1 hour
Google Analytics (_ga, _ga_*)	Google LLC	Allows us to understand how visitors interact with our website — pages visited, time on site, navigation patterns. Data may be aggregated and anonymised/pseudonymised where possible.	Consent required	1 year 1 month
Facebook / Meta Pixel (_fbp)	Facebook (Meta)	Tracks user interactions with the website for advertising and analytics purposes; helps deliver relevant advertising and measure campaign effectiveness.	Consent required	3 months
[Cookie consent management tool — confirm]	[Provider — confirm]	Stores cookie consent preferences so the website remembers your choices during future visits.	Essential	1 year
Website platform cookie(s)	Iceberg Digital	Supports core website functionality.	Essential	[Session/Persistent — confirm]

4. How to Turn Off All Cookies and Consequences of Doing So

If you do not want to accept any cookies, you may be able to change your device settings so that cookies (including those which are essential to the services requested) are not accepted. If you do this, please be aware that you may lose some of the functionality of our Services and of other Services you use on your device.

For further information about cookies and how to disable them please go to the guidance on cookies published by the UK Information Commissioner's Office, www.aboutcookies.org or www.allaboutcookies.org.

5. Changes to This Policy

This policy was published on [DATE] and last updated on [DATE]. We regularly review the cookies we use to ensure this policy remains accurate. We may change this cookies policy from time to time; when we do, we will inform you via the Services or by sending an email to the email address you provided when you signed up to the Services.

OUR CONTACT DETAILS

Telephone: 01480 276888

Email: sales@giggsandco.com

Lettings – 01480 278188, lettings@giggsandco.com

Company Number: 07954901 | VAT Number: 132984401

Lettings: Company Number: 12592011 | VAT Number: 348700200

Registered Office: 150-152 Great North Road, Eaton Socon, St Neots, Cambs, PE19 8GS