

Data Protection Policy

Cooke & Arkwright

RICS Regulated Firm No: 001586

1. Introduction

Cooke & Arkwright (“we”, “us”, “our”) is a firm of Chartered Surveyors regulated by the Royal Institution of Chartered Surveyors (RICS). We are committed to protecting personal data and handling it responsibly in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- RICS Rules of Conduct for Firms
- Guidance issued by the Information Commissioner’s Office (ICO) [ico.org.uk], [ico.org.uk]

This policy explains how we collect, use, store, and protect personal data in the course of providing surveying services.

2. Who We Are (Data Controller)

Data Controller:

Cooke & Arkwright

Address: 7-8 Windsor Place, Cardiff CF10 3 SX

Email: andrew.gardner@coark.com

Telephone: 02920 346 346

We are registered with the Information Commissioner’s Office (ICO) as a data controller where required. [ico.org.uk]

3. The Personal Data We Collect

Depending on the service provided, we may collect:

Clients & Property-Related Data

- Names, addresses, emails, phone numbers
- Property addresses and tenure details
- Valuation, inspection, and condition information
- Photographs, plans, and reports
- Financial information (e.g. fees, invoices)

Tenants, Occupiers & Third Parties

- Names and contact details
- Information relevant to inspections or management
- Identification checks where required

Employees & Consultants

- Contact details and employment records
- Professional qualifications and CPD
- Payroll and pension information

Personal data in surveying practice commonly arises from client instructions, property inspections, CCTV, photographs, and reports, as recognised by RICS guidance. [rics.org]

4. Lawful Bases for Processing

We process personal data under the following UK GDPR lawful bases:

- Contract – to perform surveying services requested by a client
- Legal obligation – to comply with statutory, regulatory, and RICS requirements
- Legitimate interests – to operate and manage our professional business
- Consent – where required (e.g. marketing communications)

These lawful bases are consistent with ICO requirements and RICS data-handling expectations. [ico.org.uk], [rics.org]

5. How We Use Personal Data

We use personal data to:

- Provide professional surveying services
- Prepare reports, valuations, and advice
- Communicate with clients, tenants, and stakeholders
- Manage contracts, accounts, and regulatory compliance
- Meet RICS professional and ethical obligations
- Prevent fraud and manage risk

RICS expects firms to clearly document purposes for holding and using data and to avoid secondary uses without a lawful basis. [rics.org]

6. Data Sharing

We may share personal data with:

- Clients and their professional advisers
- Solicitors, lenders, insurers, or managing agents
- IT service providers and secure cloud platforms
- Regulatory bodies (e.g. RICS, Courts, HMRC)
- Contractors assisting in service delivery

All third parties are required to maintain appropriate data protection and confidentiality standards, in line with UK GDPR controller–processor rules. [rics.org]

7. Data Retention

We retain personal data only for as long as necessary for:

- Delivery of professional services
- Legal, contractual, and regulatory obligations
- Establishment, exercise, or defence of legal claims

Typical retention periods in surveying practice are 6–15 years, depending on the service and risk profile, consistent with RICS and professional indemnity expectations. [rics.org]

8. Data Security

We implement appropriate technical and organisational measures, including:

- Secure IT systems and access controls
- Encryption where appropriate
- Staff training on data protection
- Secure disposal of data
- Incident and breach response procedures

RICS guidance emphasises employee training, supplier due diligence, and breach prevention as key risk areas.

9. Your Rights Under UK GDPR

Individuals have the right to:

- Access their personal data
- Rectification of inaccurate data
- Erasure (where applicable)
- Restrict or object to processing
- Data portability
- Withdraw consent (where processing is based on consent)
- Lodge a complaint with the Information Commissioner’s Office (ICO)

These rights are set out in Articles 12–22 UK GDPR and explained by the ICO. [ico.org.uk]

10. Subject Access Requests (SARs)

Requests relating to personal data should be submitted in writing to:

Andrew Gardner, Cooke & Arkwright, 7-8 Windsor Place, Cardiff, CF10 3SX - andrew.gardner@coark.com

We respond within one month, in line with UK GDPR requirements. [ico.org.uk]

11. Complaints

If you are unhappy with how we handle your personal data, you may complain to:

Information Commissioner's Office

Website: <https://www.ico.org.uk>

Tel: 0303 123 1113

[[ico.org.uk](https://www.ico.org.uk)]

12. Policy Updates

This policy may be updated from time to time to reflect legal, regulatory, or business changes. The latest version will always be available on request or via our website.

As the GDPR regulation states, we will respond to your request/enquiry within the stated one-month period upon receipt.



Signed by:

Date signed: 30th April 2026

Job Title Managing Director

Last Review Date: April 2026

Next Review Date: April 2027