

SMALLHOLDINGSALES

Privacy Policy

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How SmallholdingSales uses personal information

Operated by SMALLHOLDINGSALES LIMITED, 1st Floor Unit 2ca Deer Park Farm Industrial Estate, Knowle Lane, Fair Oak, Hampshire, England, SO50 7DZ. Contact: info@smallholdingsales.com

1. Who we are

The data controller is SMALLHOLDINGSALES LIMITED, 1st Floor Unit 2ca Deer Park Farm Industrial Estate, Knowle Lane, Fair Oak, Hampshire, England, SO50 7DZ, company number 17441404. Contact: info@smallholdingsales.com. References to “SmallholdingSales”, “we”, “us” and “our” mean the company.

2. Who this Policy covers

This Policy applies to website visitors and registered buyers, private sellers and solicitors.

3. Personal information we may collect

- Account and identity information: name, email address, telephone number, login/authentication data, account role, account status and preferences.
- Buyer information: property requirements, saved properties, searches, enquiries, viewing requests, offers, counter-offers and purchase-related status information.
- Private seller information: property listing details, contact details, photographs, videos, documents, property location, enquiries, viewing arrangements, offers and sales-related status information.
- Solicitor information: name, firm and professional contact details, profile and service descriptions, pricing information, messages, appointment information and milestone updates supplied through the Platform.
- AI Virtual Renovation information: the source property photograph selected for processing, the instructions or prompts you submit, the generated visualisation, and technical or usage information needed to operate and secure the feature. Please do not include unnecessary personal or sensitive information in AI prompts.
- Seller reporting information: where required by applicable digital-platform reporting legislation, information such as seller identity and contact details, relevant property/listing or transaction information, tax-related identifiers or other details required by law. The exact information requested will depend on the legal requirements applicable to the Platform and the seller.
- AI processing details: when you use AI Virtual Renovation, your photograph and instructions may be sent to a third-party AI provider to generate the requested image. The generated image may be stored and displayed to you as part of the feature. The original seller photograph is not intentionally overwritten by the visualisation feature. The provider, data-processing terms, whether inputs are retained or used for model training, applicable international transfers, and retention periods for inputs and outputs must be verified against the live integration before this Policy is published. We will not state that an AI provider does not train on submitted content unless that is confirmed by the provider's applicable terms and configuration.

- Transaction and communication information: messages, viewing requests and responses, offer history, acceptance/rejection/counter-offer actions, solicitor appointment information, tracker milestones and related notifications.
- Payment information: transaction references, payment status, invoices and billing details. Where a payment provider handles card data directly, we do not intend to store full card details.
- Technical and usage information: log data, device/browser information, security events, and cookie or similar technology data where used in accordance with applicable law.
- Support and correspondence: information you provide when contacting support, reporting a listing or account, or making a complaint.

4. How we use personal information and our lawful bases

We must identify and document the lawful basis for each processing purpose. Depending on the circumstances, we may rely on the following bases under UK data protection law:

- Contract or steps at your request before entering a contract — to create and manage accounts, publish listings, operate matching tools, facilitate messages and viewings, process offers and transaction records, support solicitor appointment workflows, provide trackers and process purchases.
- Legitimate interests — to secure and maintain the Platform, prevent abuse, moderate content, handle complaints, improve functionality, maintain business records and understand aggregated interest in rural property, where those interests are not overridden by your rights.
- Legal obligation — to comply with applicable tax, accounting, digital-platform reporting, regulatory, law-enforcement or other legal requirements, including providing information to HMRC where the law requires it.

Where we process seller information for a statutory reporting obligation, we use it for that compliance purpose and related record-keeping. This reporting is separate from checking whether a seller owns a property or has legal title or authority to sell it. Any identity or information checks carried out for reporting purposes do not, by themselves, verify property ownership or title.

- Consent — where required for non-essential cookies, certain analytics, marketing communications or other processing for which consent is the appropriate basis.

The lawful basis must be confirmed for each live processing activity before publication. Where we rely on legitimate interests, we will document the relevant interests and balancing assessment.

5. Property Matchmaker and matching

If you create Property Matchmaker requirements, we use the criteria you provide—such as property type, location, price range, acreage, bedrooms, facilities and lifestyle requirements—to identify potentially relevant properties and, where the feature supports it, help sellers understand relevant buyer demand. A match is an indication only and is not a guarantee of interest, suitability, a viewing, an offer or a sale.

6. Offers, negotiations and transaction tracking

If you submit, receive, counter, accept or reject an offer through the Platform, we process the information and action history needed to display the offer workflow, notify the relevant users, maintain a record of activity and support communications about the potential transaction. We may also process solicitor appointment information and Sales Tracker or Purchase Tracker milestones.

Information is made available to the relevant buyer, seller and, where you appoint or communicate with a solicitor through the Platform, that solicitor, to the extent needed for the feature. Do not put sensitive or unnecessary personal information in offers or messages.

7. Solicitors and third-party professional services

Solicitors using the Platform act independently. Where you contact or appoint a solicitor, we may share relevant contact, property, transaction or communication details with them so they can respond or provide the service you request. Their handling of your information for their legal engagement is also governed by their own privacy notice and professional obligations. You should review their privacy information and engagement terms.

8. Property listings and public information

Information in a published listing may be visible to website visitors. Do not upload information you do not have permission to share. For privacy and security, we may display an approximate location to the public and restrict access to exact address information or private documents. The actual display and access rules depend on the live Platform configuration and must be checked before publication. We do not routinely verify a seller's ownership or legal title to a property. Any seller information collected or checked for digital-platform reporting or HMRC compliance is separate from property-title verification.

9. Observed Search Demand

The Platform may process settled search criteria to understand aggregated interest in rural property. The intended design is to avoid including a user ID, IP address, cookie identifier or device identifier in the demand signal, and to use coarsened geographic information where appropriate. Aggregated demand information is not intended to identify an individual searcher. The current implementation has been described as retaining demand signals for up to 90 days; this period and the actual data fields must be verified against the production system before this Policy is published.

10. Cookies and similar technologies

We use essential technologies for account login, session management, security and core Platform functions. Non-essential analytics, preference or marketing technologies will only be used where permitted by law and, where required, after valid consent. See the separate Cookie Policy and the cookie controls available on the website.

11. Marketing

We may send service messages needed to operate your account or transactions. We will send marketing communications only where we have an appropriate lawful basis and have met applicable electronic-marketing rules. You can unsubscribe from marketing emails using the link provided or by contacting us. Unsubscribing from marketing does not stop essential service messages.

12. Who we share information with

- Other users involved in a listing, enquiry, viewing, offer, transaction or solicitor appointment, to the extent required for the relevant feature.
- Hosting, cloud infrastructure, database, security, email, notification, customer support, payment, mapping, analytics and AI service providers that help operate the Platform. An AI provider may receive the photograph and instructions submitted to AI Virtual Renovation where needed to generate the output.
- Solicitors you choose to contact or appoint, and other professional advisers where necessary for the requested service.
- HMRC and other regulators, law enforcement, courts, professional advisers or other parties where required or permitted by law, or where necessary to protect rights, safety or the Platform.

We do not sell personal data to third parties. We require service providers processing data on our behalf to handle it under appropriate contractual and security arrangements.

13. International transfers

Some providers, including potentially AI, cloud, communication or payment providers, may process personal information outside the United Kingdom. Before publication, we must identify the relevant providers and countries and describe the applicable transfer mechanism or safeguards where required by UK data protection law. Contact us if you require further information about relevant safeguards.

14. Retention

We retain personal information only for as long as reasonably necessary for the purposes described in this Policy, including account operation, transaction records, security, dispute resolution and legal or accounting obligations. Statutory seller-reporting records may need to be retained for a period required by law. AI photographs, prompts and generated images should have a defined retention period based on the feature's actual implementation and provider arrangements. The final retention schedule for accounts, listings, messages, viewing requests, offers, solicitor appointments, tracker milestones, payment records, AI inputs/outputs, logs and marketing records must be documented before publication.

15. Security

We use technical and organisational measures designed to protect information against unauthorised access, loss, misuse, alteration or disclosure. No online service can guarantee absolute security. Access to private data should be restricted by role and need. If you believe your account has been compromised, contact us promptly.

16. Your rights

Depending on the circumstances, you may have the right to access your personal data, correct inaccurate data, request erasure, restrict processing, object to processing, request portability, or withdraw consent where processing relies on consent. These rights are subject to legal conditions and exceptions. Contact info@smallholdingsales.com to make a request. We may need to verify your identity.

You can also complain to the Information Commissioner's Office (ICO), the UK data protection regulator. We encourage you to contact us first so we can try to resolve your concern.

17. Automated matching and decisions

The Platform may use automated rules or matching processes to compare buyer requirements with property details. These tools are intended to suggest potentially relevant properties and do not guarantee suitability. We do not intend to make decisions producing legal or similarly significant effects about individuals solely by automated processing. If this changes, this Policy and the relevant safeguards must be reviewed.

18. Children

The Platform is intended for adults and is not directed at children. We do not knowingly seek to collect children's personal data.

19. Third-party links and services

The Platform may link to or embed third-party services. Those providers may process information under their own terms and privacy notices. We are not responsible for third-party privacy practices outside our control.

20. Changes and contact

We may update this Policy when the Platform, our processing or the law changes. The current version and effective date will be published on the website. Privacy enquiries: info@smallholdingsales.com.