



PRIVACY POLICY — Southampton

Last updated: 06/08/2026 | Version: 1.0

1. Who we are

This Privacy Policy explains how **Theranos Real Estate Limited** trading as **Century 21 Southampton** (“we”, “us”, “our”), collects, uses, shares and protects your personal information when you use our estate agency, lettings or property services, contact us, or use our website.

We are an **independently owned and operated franchise** of Century 21 UK. We are the **data controller** responsible for your personal data.

- **Registered company name:** Theranos Real Estate Limited
- **Company number:** 09930112
- **Registered address:** Unit 4 72 London Road, Southampton, Hampshire, England, SO15 2AJ
- **Trading address:** Unit 4 72 London Road, Southampton, Hampshire, England, SO15 2AJ
- **ICO registration number:** ZA211291
- **Data Protection Officer / contact:** Jay Guha, southampton@century21uk.com, 02380 222221

We are registered with the Information Commissioner’s Office (ICO) as a data controller, and — as an estate agency business — we are supervised for anti-money-laundering purposes by **HMRC**. We are a member of the following redress scheme: **The Property Ombudsman**, and (where applicable) the following client money protection scheme: **Money Shield**.

Some enquiries reach us through the Century 21 UK website, which is operated by our franchisor, Maurice MacNeill Iona Limited. When we receive your details this way, we become the data controller for handling your enquiry and providing our services to you.

2. The information we collect

2.1 Information you give us

Depending on how you deal with us (as a buyer, seller, landlord, tenant, applicant or enquirer), this may include:

- Name, and contact details (email, phone, postal address)
- Property details, requirements and preferences
- Proof of identity and address, and other documents required to meet our legal anti-money-laundering obligations
- Financial information relevant to a transaction (for example proof of funds, mortgage-in-principle details, and — for tenancies — referencing and affordability information)
- Correspondence and records of our communications with you
- Any other information you choose to provide

2.2 Special category and criminal-offence data

In limited circumstances we may process **special category data** (for example, information about health or accessibility needs relevant to a viewing or tenancy) or information about **criminal convictions** where required for anti-money-laundering or fraud-prevention checks. We only do this where a lawful condition applies (see Section 3).

2.3 Information we receive from others

We may receive information about you from third parties, including the Century 21 UK website (operated by Maurice MacNeill Iona Limited), property portals (for example Rightmove, Zoopla), identity-verification and referencing providers, other agents, conveyancers and mortgage brokers, and publicly available sources such as the Land Registry.

3. How we use your information, and our lawful basis

Under UK data protection law we must have a valid “lawful basis” for using your personal data. The table below sets out what we use your data for and the lawful basis we rely on.

What we use your data for	Lawful basis
Providing our estate agency, lettings or property services and progressing a sale, purchase or let	Performance of a contract, or taking steps at your request before entering a contract
Verifying your identity and carrying out anti-money-laundering / due-diligence checks	Legal obligation (Money Laundering Regulations 2017)
Complying with other legal and regulatory duties (e.g. HMRC, our redress scheme, court orders)	Legal obligation
Sending you property listings, updates and relevant marketing	Consent, or our legitimate interests where you are an existing client and can opt out
Improving our services and keeping our systems secure	Our legitimate interests in running and improving the business
Preventing fraud, and crime-prevention or safeguarding disclosures	Legal obligation, or a recognised legitimate interest

Where we process **special category data**, we do so on an additional condition such as your explicit consent, or because it is necessary for reasons of substantial public interest (for example fraud prevention or safeguarding). Where we rely on **consent**, you can withdraw it at any time (see Section 7).

4. When we share your information

We do not sell your personal data. We share it only where necessary, with:

- **Other parties to a transaction** and their representatives — for example buyers, sellers, landlords, tenants, and their conveyancers or solicitors
- **Professional and service providers** who help us operate — for example IT and CRM providers, identity-verification and referencing agencies, marketing and property-portal providers
- **Mortgage lenders, surveyors and valuers** where relevant to a transaction
- **Regulators and public bodies** — for example HMRC, the ICO, our redress scheme / property ombudsman, or law-enforcement bodies where we are legally required to disclose
- **Our franchisor, Maurice MacNeill Iona Limited (Century 21 UK)** — where necessary, for example in relation to complaints handling, brand and network administration, or enquiries routed through the Century 21 UK website
- **A buyer of our business or assets** in the event of a sale, merger or restructuring

We require our service providers to protect your data and to use it only for the purposes we specify.

5. Where we store and process your data

We store and process your personal data within the **UK**. We do not transfer your personal data outside the UK. If this changes, we will update this policy and make sure any transfer is appropriately protected.

6. How long we keep your information

We keep your personal data only for as long as necessary for the purposes we collected it, and to meet our legal obligations:

- **Anti-money-laundering records** (ID and due-diligence documents): retained for **5 years** after the end of our business relationship or the completion of the transaction, as required by the Money Laundering Regulations 2017.
- **Transaction and client records**: retained for **6 years** to meet our contractual, tax and legal requirements.
- **Marketing data**: kept until you unsubscribe or ask us to stop, and reviewed periodically.

When data is no longer needed, we securely delete or anonymise it.

7. Your rights

Under UK data protection law you have the right to:

- **Be informed** about how we use your data (this policy)
- **Access** the personal data we hold about you (a “subject access request”)
- **Rectification** — have inaccurate data corrected
- **Erasure** — have your data deleted in certain circumstances
- **Restrict** our processing of your data in certain circumstances
- **Data portability** — receive your data in a structured, commonly used, machine-readable format
- **Object** to processing based on our legitimate interests, and to direct marketing at any time
- **Rights relating to automated decision-making** — we do not make decisions about you based solely on automated processing without human involvement
- **Withdraw consent** at any time where we rely on your consent

To exercise any of these rights, contact us using the details in Section 1. We will normally respond within **one month**, and may ask you to verify your identity first.

Complaints

If you are unhappy with how we have handled your personal data, please **contact us first** using the details in Section 1 — we take complaints seriously, will acknowledge yours promptly and aim to resolve it fairly.

You also have the right to complain to the **Information Commissioner’s Office (ICO)**, the UK’s data protection regulator, at any time:

- Website: ico.org.uk
- Helpline: 0303 123 1113
- Post: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

We would, however, appreciate the chance to address your concerns before you approach the ICO.

8. How we protect your information

We take appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, alteration or disclosure. No method of transmission or storage is completely secure, but we work to keep our systems and processes up to date.

9. Changes to this policy

We may update this Privacy Policy from time to time to reflect changes in our practices or the law. We will post the updated version and update the “Last updated” date above. Where changes are significant, we will take reasonable steps to bring them to your attention.

10. Contact us

For any question, request or complaint about your personal data, or this policy, please contact:

Jay Guha, Data Protection Officer

Theranos Real Estate Limited trading as Century 21 Southampton

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