



Privacy notice

Like most businesses, Ramsay Cornish holds and processes a wide range of information about its clients and other persons who may be interested in Ramsay Cornish's services. We are committed to protecting and respecting your privacy.

This policy together with our terms of use and any other documents referred to on it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The privacy notice is split into the sections listed below. The terms used in this document, such as personal data are clarified in the Definitions at the end of the document. This document may be updated from time to time and we recommend that you check our policy regularly, this can be done by visiting our website where a link to this policy can be found on the home page. Any changes will be immediately effective on posting.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

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Who we are

Ramsay Cornish (SC252060) is an independent limited company of Auctioneers and Valuers of Goods and Chattels. Our offices and saleroom are based at 15-17 Jane Street, Edinburgh, EH3 6PP, all correspondence should be to this address. Contact details are: telephone, 0131 553 7000 or email: info@ramsaycornish.com . Our registered office is 7 Brandon Street, Edinburgh, EH3 5DX. Ramsay Cornish Auctioneers Ltd is the data controller. This means that we decide how your personal data is processed and for what purposes.

The categories and collection of personal data:

Collection directly from you in response to our request

Most of the personal data we process about you comes directly from you (whether face to face, over the telephone, on a paper form, by email or online) for example:

- when you register to bid in an auction, agree to sell your property through Ramsay Cornish or ask us to perform a valuation
- when you consign goods to sale with Ramsay Cornish
- when you express an interest in buying or selling certain types of property to one of our staff or representatives;
- when you sign up on ramsaycornish.com to receive news about upcoming auctions

Automatic collection when you visit our premises or our website

Your image may be collected by Ramsay Cornish if you attend our premises. We use CCTV at our saleroom for the protection of our staff, our visitors and the property that we sell. We also video our auctions for security reasons and to monitor bidding practices. From time to time we may have television crews visiting our saleroom to film a particular auction. From time to time we may upload a video of a particular lot being sold in our saleroom onto social media.

We collect data about your computer when you visit our website, which includes your internet address, your operating system and browser type. We use this information for our internal system administration, to help diagnose problems with our servers, to administer our website and monitor and improve the user experience.

We also collect data about you through cookies. A cookie is a simple text file that is stored on your computer or mobile device by our website's server which allows our website to remember your preferences or transactions that are in progress. You can see more detail on cookies in our Cookies Policy.

Collection of data from other sources

We may also obtain information about you and/or the property you own or wish to collect from other sources, for example:

- When someone informs us that you are authorised to bid on their behalf at Ramsay Cornish or visits us to collect your property

What personal data do we process and why?

We have set out below the types of personal data that we process, the purposes for which we use it and the legal grounds on which we process it. The section *Definitions* contains more information about the legal grounds for processing. This will be deleted when there is no longer any legitimate or legal reason to retain it.

Purpose	Examples of personal data (please note that the list is not exhaustive)	Legal grounds for processing
<p>To provide you with requested services</p> <p>(for example, bidding, selling, valuations, storage, shipping, sales advice)</p>	<ul style="list-style-type: none"> • name, title, and contact details (including email address, postal address, telephone numbers) • your bank account details (if we need to pay you by bank transfer) • details of the property to which the services relate • nature of the services including contractual terms • records of your communications with us (including bidding instructions recorded over the telephone or online bidding logs) 	<p>Performance of a contract</p>
<p>To evidence our compliance with legal requirements, (for example, knowing our clients and preventing money-laundering, payment of taxation and customs duties, anti-discrimination)</p>	<ul style="list-style-type: none"> • details of your past transactions (including any tax paid or tax withheld) and/or shipments (including any permits obtained or duties paid) • any requirements relating to Ramsay Cornish's obligation to make reasonable adjustments to accommodate a disability or otherwise meet your specific needs • any information relating to a dispute or legal proceeding 	<p>Compliance with a legal obligation</p>
<p>To keep you, our staff, and property on our premises secure</p>	<ul style="list-style-type: none"> • CCTV images 	<p>Legitimate Interests</p>

<p>To provide you with details about upcoming auctions at Ramsay Cornish.</p>	<ul style="list-style-type: none"> • your name, email address and/or postal address 	<p>Legitimate Interests (for clients who have previously requested or received services)</p> <p>Consent (for clients who have not requested or received services but have signed up to receive Ramsay Cornish's news online, at an event, by talking to a member of staff)</p>
<p>To create and maintain records on art objects to assist with checks on authenticity, provenance and title and prevent fraud, theft or other unlawful activities</p>	<ul style="list-style-type: none"> • your interest in, possession of, or ownership (historic or current) of any relevant art object, or similar object • allegations of fraud, theft or other unlawful activities relating to an object connected to you • communications with the police, courts, regulators or other government or law enforcement authorities in relation to you or your object 	<p>Legitimate interests</p> <p>Public interest</p>
<p>To monitor the performance of our website and make your user experience better</p>	<ul style="list-style-type: none"> • your internet address • your browser type and operating system • the resources you access on our wider website • the data obtained from cookies, web logs and other similar technologies that monitor the use of our website and deliver more appropriate advertisements on or beyond our website 	<p>Legitimate Interests</p>
<p>To monitor your use of our services, train our staff and improve your client or user experience</p>	<ul style="list-style-type: none"> • your complaints, opinions, or comments 	<p>Legitimate Interests</p>

Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only if it is necessary to enable us to provide you with the services you have requested ie we may transfer your data to our bank, shippers, or carriers, insurers. Where we do so it will be on the basis that these organisations are required to keep the information confidential and secure, and they will only use the information to carry out the instructed services.

We may also need to retain and disclose certain information about you to appropriate agencies to conduct for example anti-money laundering and trade sanction checks and to assist with fraud and crime prevention and detection or on occasion we may receive a request from hmrc.

No government entity has direct access to your data. Where we receive a request from a government or law enforcement authority to provide your data, we will only disclose such information where we are ordered to do so by a court or we are otherwise satisfied after internal review that the body making the request has both the right to seek disclosure and has followed the correct process.

How long will we keep your personal data?

We will retain your personal data for as long as is necessary to provide the relevant services, maintain business records to satisfy tax, legal and other regulatory requirements, for safeguarding purposes, and protect and defend against potential legal claims.

What steps do we take to keep your personal data secure?

We will take all reasonable and appropriate steps to protect the security and integrity of all personal information provided via our website, or by any other means electronic or otherwise.

We use a variety of security technologies and procedures to help protect your personal details from unauthorised physical and electronic access.

As effective as modern security practices are, we cannot guarantee the complete security of personal data held in our systems, nor that that information you supply through the internet or any computer network is entirely safe from unauthorised intrusion, access or manipulation during transmission. Any transmission is at your own risk. We will not be liable for any resulting misuse of your personal data.

Providing us with your personal data

Email newsletters

You are under no statutory or contractual requirement or obligation to provide us with your personal data.

Bidding at Ramsay Cornish/consigning goods to sale/receiving instructions for and undertaking a formal valuation

We require your personal data as it is a requirement necessary to enter into a contract.

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing the data
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests); direct marketing and processing for the purposes of historical research and statistics).

6. Transfer of Data Abroad

We do not transfer personal data outside the EEA.

7. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

8. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

9. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact us on info@ramsaycornish.com or call us on 0131 553 7000 where a member of staff will be able to help you.

Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

Compliance with a legal obligation - processing is necessary to ensure we comply with our legal and regulatory obligations.

Consent – you have given specific consent to the processing of your personal data.

Filing System – a structured set of personal data that is accessible according to specific criteria.

Legitimate Interests - processing is necessary for our or a third party's legitimate interests in carrying on, managing and administering our respective businesses effectively and properly (except where our or the third party's interests are overridden by your own interests, rights and freedoms).

Performance of a contract – processing is necessary to carry out our contractual duties, exercise our contractual rights or otherwise perform our contract with you, or to take steps at your request to enter a contract.

Personal Data - any data relating to an identified or identifiable natural person. This can include names, user ID, location data, email addresses, photographs, job applications, purchase history, user account information, opinions, and correspondence to and from an individual.

Processing - any operation performed on personal data, such as collection, recording, storage, retrieval, use, combining it with other data, transmission, disclosure or deletion.

Public Interest – processing is necessary for the performance of a task carried out in the public interest.