

Privacy Notice: Anti-Money Laundering (AML) and Sanctions Screening

Encore is committed to protecting your personal data. This notice explains how we collect, use and protect your information in relation to anti-money laundering (AML) and sanctions screening checks, in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.

1. Who we are

We are Encore Estate Management Limited, the managing agent, registered at 2 Hills Road, Cambridge, England CB2 1JP.

2. What data we collect

We may collect and process the following personal data for AML and sanctions screening purposes:

- Full name
- Date of birth
- Residential address
- Identification documents (e.g. passport, driving licence)
- Information obtained from public sources and screening databases

3. Why we collect your data

We are required to carry out AML and sanctions screening to comply with UK law and, in some cases, to meet the requirements of our banking partners to help prevent fraud, money laundering and other financial crime. We process your data for the following purposes:

- Verifying your identity
- Conducting checks against sanctions lists and politically exposed persons (PEP) lists
- Detecting and preventing money laundering, fraud, and other financial crime.

4. Third-party screening and CRA involvement

We use a third-party provider to carry out sanctions, fraud, and other compliance screening checks. As part of this process, the provider may share your personal data with credit reference agencies (CRAs). These agencies may retain a record of the search and may share that information with other organisations for purposes such as credit risk

assessment, fraud prevention, anti-money laundering, and tracing individuals with outstanding debts. These searches may leave a footprint on your credit file; however, they are not credit checks and do not affect your credit score. The search will appear in the name of the screening provider (acting as an agent of TransUnion), not under Encore Estate Management Limited.

You can learn more about how CRAs use personal data by reading the Credit Reference Agency Information Notice (CRAIN), which is available at: [CRAIN v1.2](#)

5. Lawful basis for processing

We process your personal data because it is necessary to comply with our legal obligations under anti-money laundering and financial crime prevention laws.

In some cases, we may process your personal data where it is necessary for the purposes of legitimate interests pursued by us, the data controller, or our banking partners - for example to help prevent fraud, money laundering and other financial crime, and meet regulatory compliance obligations.

6. Who we share your data with:

We may share your personal data with:

- Specialist third-party AML screening providers
- Our banking partners
- Group companies within our corporate structure, where such sharing supports our services or legal obligations
- Regulatory authorities or law enforcement agencies if required by law.

7. How long we keep your data

We will retain your personal data for as long as required under applicable anti-money laundering and financial crime prevention laws (typically 5 years from the end of the business relationship or transaction for AML purposes), or for as long as necessary for our or our banking partners legitimate interests in preventing fraud, money laundering, and other financial crimes, provided such interests are not overridden by your data protection rights

8. **Marketing communications**

We may use your name and contact details to send you information about our services and offers that may be of interest to you.

We will only do this where we have your consent or it is in our legitimate interests, and you can opt out from these marketing messages at any time by:

- Clicking the “unsubscribe” link in our emails, or
- Contacting us at info@encoreestates.co.uk

We will not use sensitive personal data collected during AML and sanctions screening (such as identity documents or sanctions check results) for marketing purposes.

9. **Your rights**

You have certain rights under data protection law, including the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure in certain circumstances
- Object to processing in limited situations
- Lodge a complaint with the Information Commissioner’s Office (ICO)

10. **Contact us**

If you have any questions or wish to exercise your rights, please do not hesitate to contact us.