

Privacy Policy

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Circa Residential Property Ltd is committed to protecting your personal data when you are using our services. Personal data is any information relating to an identifiable living person who can be directly or indirectly identified by reference to an identifier such as a name, address, email, and ISP addresses and cookies.

This privacy notice relates to our use of any personal data that we collect from you whether in the course of the supply of our property sales, lettings or management Services, Website interaction, or the provision of any other associated products and services.

We will comply with data protection law which requires that personal data we hold about you is:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only long as lawfully necessary for the purposes we have told you about; and
6. Kept securely.

This privacy notice will, therefore, inform you as to who we are, what personal data we collect, the purposes for which we use it, for how long we retain it and how we keep it secure, your rights in relation to your personal data and how you can contact us to discuss, query or obtain details of the personal data we hold about you.

Topics covered:

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Personal data sources

We can collect personal data from any number of sources including:

- Information you provide by visiting our website (www.circaproperty.co.uk), filling in forms online requesting our products and/or services, contacting us, and contracting with us.
- Publicly available information such as Companies House, LinkedIn, and search engines such as Google.
- Third party providers such as debt recovery agencies, contractors, and business introducers.

How we will inform you about our privacy notice

You can request a free hard copy of this privacy notice by contacting us using the details set out above.

Where we obtain your personal data indirectly, for example from a business contact or website, we will inform you where you can access this privacy notice within one month of obtaining that data.

We will not use your personal data for any purposes other than those set out below without first informing you. Changes made to this privacy notice will be updated on our website and clearly signposted on our key documents.

The purposes for which your personal data is collected and processed.

We collect personal data with the overall aim of providing a better service to all of our customers and industry partners.

We will not collect sensitive personal data from you. For example, we will never ask for or process data relating to race, religion or ethnicity.

The personal data categories identified below are relevant and specific for the products and services that we offer or obtain. The listing also describes how and why we process them.

Name, address, and contact details (including company details, contact names, telephone numbers, and email addresses)

This data allows us:

- To carry out our obligations arising from any contracts entered between you and us including delivery of product, invoicing, and reporting; and
- To provide you with information on products and/or services you specifically request from us or which we believe may be of interest to you.
- If you are an existing customer, we will only contact you by email and/or Telephone with information about products and/or services like those which we have previously supplied to you.
- If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by email and/or Telephone only with your consent.
- If you do not want us to use your personal data to market to you by email and/or Telephone or pass on your details to third parties for marketing purposes, please,

unsubscribe by using the link in the relevant email. Please note it might take up to 30 days for us to update our records.

On occasions we will share your contact details with our agents (such as third-party suppliers) who may need to contact you to arrange, for example, referencing, insurance, and mortgage products. Or the supply of other associated products and services on our behalf.

Most contact details will be provided by you at the point that you make an online enquiry or request or provide a quotation. In some cases, we may need to obtain alternative contacts (for example an Office manager) who may be best suited to assist us should we have a specific query. Where we have no contact details, we may

sometimes take proactive steps to collect data using desktop research (such as internet searches).

There may be an impact on the level of service we provide should we have only limited or inaccurate contact details.

Employment and education details

This data allows us to carry out recruitment. We will dispose of all unsuccessful candidates' data securely.

Bank and payment details.

This data may be provided to us at the start of or at any time during our business relationship with you. Such data can relate to the setting up of a direct debit, which we will process in accordance with the direct debit guarantee scheme.

We do take credit and debit card payments over the telephone and via our online ordering system on our website. We will not ask you to confirm your bank details by email and only over the telephone should we need to make any payments to you. These processing activities allow us to charge you for our products and services and make payments to you.

Telephone call recordings.

External telephone calls are recorded for training, security and auditing purposes and stored for 120 days. Calls regarding complaints or confirmation of contractual status may be kept on record for the duration of the Contract.

Electronic and hardcopy correspondence and other documentation

We may collect and process electronic and hardcopy correspondence and other documentation (such as emails, invoices, contracts, tenders, and letters) as part of either a contractual obligation or a wider legitimate interest.

When you contact Circa Residential Property Ltd for any reason, we may keep a record of our communication to help us deal with any queries and/or to support our customer service delivery operation.

The cookies provide us with anonymous information showing us the number of visitors to our website, the device used to access it and which web browser they are viewing it on. This data allows for statistical analysis and helps us understand our customer behaviour better and optimise your online experience. Cookies, also, provide a convenience feature to save you time. For example, if you personalise a web page or navigate within a site, a cookie helps the site to recall your specific information on subsequent visits. This simplifies the process of delivering relevant content and eases site navigation.

For further information visit www.aboutcookies.org or www.allaboutcookies.org
You can set your browser not to accept cookies, and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Who will we share your personal data with?

We may share your personal data with:

- Regulatory authorities (such as Trading Standards), Government departments (such as HMRC), or the police in order to comply with any legal obligations or to assist in fraud prevention and detection.
- Credit agencies (for the purpose of credit risk management), and professional advisors to enforce or apply the terms of any contracts between us and you.
- Third party suppliers where we have subcontracted to them the performance of any or all of our obligations under our contract with you.
- The buyer and its professional advisors should we wish to sell any or all of our business and/or our assets in which case personal data we hold about our customers will potentially be one of the assets we sell; and
- Other third parties where we reasonably believe that such action is necessary to comply with a legal obligation, or to protect our rights and property.

Transferring your data outside of the European Economic Area

Some of our processing activities may involve your personal data being transferred to a third- party agency who may in turn process your data outside of the European Economic Area (**EEA**). In such instances the transfer of data outside of the EEA is necessary for the performance of a contract between us and that of our processing partner.

Safeguarding your personal data

Circa Residential Property Ltd takes all reasonable steps to ensure that appropriate safeguards are in place to protect your personal data. We have policies in place dealing with information security (both physical and digital) and data breaches. We ensure that we can process your data securely and safely.

Safeguards are regularly reviewed as part of our wider data protection policy which sets out how we aim to preserve the confidentiality, integrity, and availability of personal data we hold.

How long we retain your personal data.

Your personal data will be retained by us for as long as there remains a valid lawful basis for retaining it. We will keep data retention under regular review.

Accounting information (such as invoices) will be retained for at least 6 years in line with current tax legislation. Contractual documentation will be held for at least 3 years.

Your rights as a data subject

To ensure fair and transparent processing it is important that we inform you of your rights with regards to how your personal data is processed. Where you wish to exercise a right, we have signposted the best contact details for you to get in touch with us. Naturally, we will need to confirm your identity before your request can be processed.

Your right to be informed.

- Third party suppliers where we have subcontracted to them the performance of any or all of our obligations under our contract with you.
- The buyer and its professional advisors should we wish to sell any or all of our business and/or our assets in which case personal data we hold about our customers will potentially be one of the assets we sell; and

- Other third parties where we reasonably believe that such action is necessary to comply with a legal obligation, or to protect our rights and property, or act in urgent circumstances to protect the personal safety of users of our products or services or members of the public.

Your right to access.

As a data subject you have the right to access the personal data, we hold about you and check that we are lawfully processing it.

To make a data subject access request (**DSAR**) is free and can be done in writing by emailing us at info@circaproperty.co.uk or alternatively writing to us at:

The Data Protection Manager (Adam Rowdon)
adam.rowdon@dns-uk.biz

You can also speak to the information commissioner's office at ico.org.uk should you have any questions or queries relating to a DSAR.

In line with legal requirements, we do have a data protection officer due to the nature and volume of our processing activities.

Once we receive your request, we will ask you to verify your identity and ask you to specify the data or processing activity that you require so that we can confirm your expectations and respond within one month.

We do have the right to refuse a DSAR should it be manifestly unfounded or excessive and we can apply a reasonable fee and/or extend the time to respond should the request be complex (in which case you would be informed within 30 Days). We do have the right to charge a reasonable fee if you make numerous requests for the same information.

Your right to rectification

Where personal data is inaccurate or incomplete you have the right for it to be rectified on our systems. In such cases we will act promptly to put things right.

So that we can quickly resolve your query we may ask you to provide some supporting evidence to show that the data needs to be altered.

If you require your personal data to be rectified, you can speak to info@circaproperty.co.uk who will put you in contact with the data protection manager
Your right to erasure.

This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to withdraw consent (see below).

Sometimes, however, we may refuse a request to erase such data in order, for example, to comply with a legal obligation.

If you require your personal data to be erased, you can speak to Adam Rowdon or email info@circaproperty.co.uk

Your right to restricted processing.

This enables you to ask us to restrict the processing of your personal data. For example, if you do not want us to erase your data you may ask us to restrict our processing activities instead. A good example would be electronic invoicing.

If you wish for restricted processing to be applied to your personal data, you can speak to Contact Adam Rowdon on 020 8536 4480 or email adam.rowdon@dns-uk.biz.

Your right to data portability

To help strengthen your control over your data, you have the right, in certain circumstances, to receive personal data from us in a format which allows you to easily access it. For example, you may want your invoicing data in an Excel format.

We may ask you to specify what data you wish us to provide to you, or we may direct you to an existing service that we already provide where you can freely obtain the information. Where we can try and provide you the data in a common format which is transferable with other data controllers.

Your right to withdraw consent.

In circumstances where you may have provided your consent to the processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing activity at any time.

Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so such as a contractual or legal reason.

Your rights relating to automated decision making.

Details of what automated decision-making activities we carry out are described below in paragraph 14. If you wish to speak to a member of our team to understand the decision made, obtain an explanation of the decision, and challenge it you can speak to Adam Rowdon on 020 8536 4480.

We may reject your request not to be subject to automated decision making where such activity is a necessary step in our contracting process or is required in the performance of a contract between us.

Reporting a concern to us or to the Information Commissioner's Office

If you have a concern regarding how we handle your personal data, then we kindly request that you inform us about it first so that we can work with you in an effort to resolve it.

You can report a concern or raise a complaint with us initially by contacting your usual contact or speaking to Adam Rowdon on 020 8536 4480 or email info@circaproperty.co.uk

Alternatively, you can write to us by sending your letter to:

The Data Protection Manager
Circa Residential Property Ltd
144 George Lane
South Woodford
London
E18 1AY

We aim to acknowledge your complaint within two business days and provide a resolution within 28 days. If we are unable to meet this timescale, we will write to notify you in advance.

If you are not satisfied with our proposed resolution to your complaint, you can raise the matter directly with the Information Commissioner's Office (**ICO**). The ICO will take steps to address your concern and provide guidance and support to us so that we can put things right.

Details as to how to get in touch with the ICO or report a concern can be found on their webpage <https://ico.org.uk/concerns/>

Your right to lodge a complaint with a supervisory authority.

If you consider that the processing of personal data infringes any of your rights set out in paragraph 11, you have the right to lodge a complaint with the relevant supervisory authority in the European State that you reside, or work or in the place of the alleged infringement; the relevant supervisory authority for the UK is the Information Commissioner's Office.

The supervisory authority with which the complaint has been lodged shall inform you of its progress and the outcome of the complaint including the possibility of a judicial remedy.

The automated decision-making processes we operate.

We do not use automatic decision processes that you should be aware of.

Other Websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

Getting in touch with us

If you would like to discuss this privacy notice or suggest ways in which we could improve the content or its communication, then please contact us on 020 8536 4480 or info@circaproperty.co.uk.