

## **Branch Properties Ltd Privacy Policy and Notice**

At Branch Properties Limited, we are committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure. Please take the time to read this policy carefully. By using our website or any services provided by us, you are agreeing and consenting to the processing of your data as set out below.

We may change this Policy from time to time so please check this page occasionally to ensure that you are happy with any changes. By using our website and services, you are agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by [Sallie@branchproperties.co.uk](mailto:Sallie@branchproperties.co.uk). Alternatively, you can telephone Sallie on 020 3475 4022

### **Who are we?**

We are Branch Properties Ltd, we accessible property specialists acting also as a property letting agents with a specialist interest in accessible properties. We are a company limited by guarantee 09115086. We are based in London and offer Landlord, tenant and client services.

### **Contacting us**

If you would like to opt out of marketing and communications from us and our nominated third parties, please contact us via email at [www.branchproperties.co.uk](http://www.branchproperties.co.uk) or please write to the Customer Services Team, Branch Properties Ltd | Registered Office: International House, 24 Holborn Viaduct, London EC1A If you have any questions about this Policy or our use of your personal information, or if you wish to unsubscribe from marketing and communication messages from us or would like to submit a subject access request, please contact us via email at [sallie@branchproperties.co.uk](mailto:sallie@branchproperties.co.uk) or write to us at Branch Properties Ltd | Registered Office: International House, 24 Holborn Viaduct, London EC1A

### **Why do we collect your information?**

There are two types of data; information we collect about you and information you give us

When you supply your personal details to us, they are stored for the following reasons

1. We need to collect personal information about your housing needs and requirements in order to provide you with the best possible service. Your request for our services and our agreement to provide services forms a contract between us. You have the right to refuse to provide us with this information. If you decide not to provide your personal information, we will not be able to provide you with any services.

2. We enter into a contract with you to provide property services in accordance with our areas of expertise as landlord and tenant property agents and accessible property experts in order to enable us to provide you with details about property. We may use another Lawful basis for processing your data and will record the basis in each case.
3. We store your personal and sensitive information on computer and personal data on other electronic devices such as mobile telephone. These are either encrypted, locked or password protected to protect your data.
4. If you consent, we may from time to time send you general property information in the form of articles and newsletters. You may withdraw this consent at any time – just let us know by email [Sallie@branchproperties.co.uk](mailto:Sallie@branchproperties.co.uk) or telephone 494944949.

We have a legal obligation to retain your records for 8 years after your most recent engagement (or age 25, if this is longer), where a contract has been entered into but after this period you can ask us to delete your records if you wish. Data relating to general information which does not form the basis of any contract for services will be deleted within 3 years.

#### **Where do we store your personal data?**

Your personal and sensitive information records are stored on paper, in locked filing cabinets, which is always locked out of working hours. Some personal and sensitive information and other data is stored on the computer. Personal data may also be stored on mobile devices such as telephones and tablets. These are password protected and kept in a secure place.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We follow strict security procedures to ensure that your personal information is not damaged, destroyed or disclosed to a third party without your permission and to prevent unauthorised access to it. The computers that store the information are kept in a secure facility with restricted physical access and we use secure firewalls and other measures to restrict electronic access. If we are working with third parties, we will require them to have in place similar measures to protect your information.

Only employees who need access to your information to perform a specific job are granted access to personally identifiable information. We may require you to co-operate with our security checks before we disclose information to you. You can update the personal information that you give us at any time by contacting us.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We will never share your data with anyone who does not need access without your written consent. Only the following people/agencies will have routine access to your data:

- Your designated agents in order that they can provide you with the service you have sought.
- Administrative staff, who may organise diaries, and coordinate appointments and reminders (but they will not have access to your sensitive personal information)
- Other administrative staff, such as our bookkeeper and accountant. Again, administrative staff will not have access to your health data, just your essential contact details.
- We also use Mailchimp to coordinate our messages, so your name and email address may be saved on their server.

From time to time, we may have to employ consultants to perform tasks which might give them access to your personal data (but not your sensitive information). We will ensure that they are fully aware that they must treat that information as confidential, and we will ensure that if appropriate, they sign a non-disclosure agreement.

You have the right to see what personal data of yours we hold, and you can also ask us to correct any factual errors. Provided the legal minimum period has elapsed, you can also ask us to erase your records.

We want you to be absolutely confident that we are treating your personal data responsibly, and that we are doing everything we can to make sure that the only people who can access that data have a genuine need to do so.

Of course, if you feel that we are mishandling your personal data in some way, you have the right to complain. Complaints need to be sent to what is referred to as the "Data Controller". Here are the details you need for that: [sallie@branchproperties.co.uk](mailto:sallie@branchproperties.co.uk)

### **How do we collect information from you?**

We obtain information about you when you use our website, for example, when you contact us about products and services, or if you register to receive one of our regular newsletters.

### **What type of information is collected from you?**

**Information you give us:** We will collect the information that you give to us when using our Site. If you choose to access a particular search feature or to fill in a form on the Site, you may be asked to provide information about yourself, such as your name and contact details. We may also collect other information about you at the same time, such as details of the sort of property you are interested in, the cost and location of the property etc. We will also collect information that you provide to us when you register with us, request property email updates, participate in discussion boards or other social media functions on our Site or websites operated by associated third parties and enter into competitions, promotions or surveys. We will also collect information that you provide to us by corresponding with us by phone, e-mail or otherwise.

**Information we collect about you:** This is different to "information you give us" because it relates to technical data that we collect. For example, we may collect technical information that has the potential to identify you, such as the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We may also collect information about your visit, including the full uniform resource locators (URL) clickstream to, through and from our Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number. We may also keep a record of the advertisers or partners you contact and the contents of the emails you send to them.

**Information we receive about you from third parties:** We may receive information about you if you use any other websites we operate or the other services we provide. In this case we will have informed you, when we collected that data, that it may be shared internally and combined with data collected on this Site. We are also working closely with third parties (including, for example, social media platforms, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies) and may receive information about you from them.

## **How is your information used?**

### **Main Uses of Your Data**

This section of the Policy describes the things that we do with your data which relate directly to your use of the Site and our services. They are the things that we hope you would expect us to do with your information. We will use your information:

- to provide the services available on our Site to you;
- when you consent to us doing so, to pass your searches and messages on to our working contacts which include estate agents, commercial agents, lettings agents, developers, landlords or overseas private vendors to help them communicate with you directly and to provide a more personalised service to you. This may include contacting you about other relevant properties, adding you to their enquiry database for future contact and offering you their additional services;
- to provide services and information to third parties and our members, which they can use to benchmark their performance;
- customise and enrich your experience on our Site;
- to allow you to participate in the interactive services available on our Site or to participate in competitions or promotions via our Site;
- to contact you for your views on our services and to notify you occasionally about important changes to our Terms of Use or this Policy or developments to this Site or our services; and
- to deliver relevant advertising to you whilst you are on the Site.

### **Technical Uses**

This section of the Policy describes the things that we do with your data that arise from our monitoring of the Site and the collection of your information whilst using the Site. We may use this information:

- to identify patterns that we can use in our marketing strategy and to help us develop, administer, support and improve our services and features and adverts;
- to conduct reviews that assist us in the improvement and optimisation of our Site;

- to ensure that content from our Site is presented in the most effective manner for you and for your computer;
- to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- as part of our efforts to keep our Site safe and secure.

We may combine technical information with other information that we have about you to help us with our processing of your information as described in this Policy.

### **Use of your data for marketing and communications**

Sometimes we may use your personal information to provide marketing messages to you or allow us or third parties to communicate with you on third party services. We will always seek your consent before doing so and you can opt out of marketing and other communications at any time by contacting us [sallie@branchproperties.co.uk](mailto:sallie@branchproperties.co.uk). You can always make use of the Site without having to agree to marketing. The types of things that we may do include:

- providing direct marketing advertisements and communications to you via email, text, post or telephone or via our selected third parties;
- making suggestions and recommendations to you and other users of our Site about goods or services that may interest you or them;
- communicating with you on third party social media platforms and sharing your information with that social media platform;
- providing your information to selected third parties that we believe may be able to offer you goods or services that are of interest so that they can contact you about their goods and services; and
- monitoring the effectiveness of our direct marketing communications and your responses to it.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the information relating to your tenancy or property and some financial information. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

### **Who has access to your information?**

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Our accountant will have some limited access to your data in order to complete our accounts. We will ensure that they are compliant with the General Data Protection Rules and will treat your data as confidential and private, and not provide it to any other party.

**Third Party Service Providers working on our behalf:** We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process orders and send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we will obtain and have a contract in place that requires them to keep your information secure and not to use it for their own direct

marketing purposes. Please be reassured that we will not release your information to third parties beyond Branch Properties Ltd unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

**Third Party Product Providers we work in association with:** We work closely with various third party product providers to bring you a range of quality and reliable products and services designed to meet your property needs (e.g. companies that supply supplements or other products). When you enquire about or purchase one or more of these products, the relevant third party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. In some cases, they will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These third party product providers will share your information with us which we will use in accordance with this Privacy Policy.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

We will never share your data with anyone who does not need access without your written consent. Only the following people/agencies will have routine access to your data:

- Your nominated agent(s) in order that they can conduct or promote property searches or
- Any administrative staff will not have access to your sensitive data, they will only have access to your personal contact details.
- We also use Mailchimp to coordinate our messages, so your name and email address may be saved on their server.

## **Your rights**

You have the right to ask us not to process your personal data at any time.

You have the right to use our Site without consenting to marketing and communication services that we provide. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. We always use the most recently submitted form to be your current consent status. If you are a registered user, but not signed in when you submit a form, we will not be able to use your saved settings so will deem your consent choice to be as per the form you submit at the time. You can exercise your right to prevent such processing by ticking certain boxes on the forms we use to collect your data. You can also exercise the right to withdraw your consent at any time by contacting us at [sallie@branchproperties.co.uk](mailto:sallie@branchproperties.co.uk)

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about healthy options and our exciting

products and services, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email: [sallie@branchproperties.co.uk](mailto:sallie@branchproperties.co.uk) or telephone on 020 3475 4022

### **How you can access and update your information**

The accuracy of your information is important to us. We are working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: [sallie@branchproperties.co.uk](mailto:sallie@branchproperties.co.uk). Alternatively, you can telephone 020 3475 4022

The Data Protection Act 1998 (DPA) gives you the right to access information held about you. Your right of access can be exercised in accordance with the DPA. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

### **Security precautions in place to protect the loss, misuse or alteration of your information**

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as health OR FINANCIAL information) is encrypted and protected.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

### **Profiling**

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risk.

### **Use of 'cookies'**

Like many other websites, Branch Properties Limited website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we may use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

### **Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

### **16 or Under**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

### **Transferring your information outside of Europe**

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

### **Website recording**

We do not use website recording.

### **Other information for you is available through the following links**

- [Consent](#)
- [Your rights](#)
- [How to request access to your data](#)
- [Your right to be forgotten or have your data removed](#)
- [Your right to update and alter your information](#)



## **Review of this Policy**

We keep this Policy under regular review. This Policy was last updated in May 2018.