

## PRIVACY POLICY

### Privacy Notice

#### Foreword

At Islington Properties, we respect your privacy and are committed to protecting your personal data; this privacy notice explains how we will look after your personal data and informs you about your privacy rights under the General Data Protection Regulation ("GDPR").

We will comply with the data protection principles when gathering and using personal data, as set out in our GDPR data protection policy.

We may change this policy from time to time by updating this page; you should check this page from time to time to ensure that you are happy with any changes. This privacy notice was amended in May 2018, and it supersedes any earlier version.

Reference to "we", "us" or "our" means Islington Properties.

#### The Personal Data We Collect & Use

Whether you are i) purchasing, renting, selling or letting a property through us ii) purchasing, renting, selling or letting a property from one of our clients or iii) a leaseholder or sub-tenant, living in a property or development managed by us, we collect and use your personal data in order for us to provide you with our services; accordingly, the personal data we collect and use may include the following:-

- Identity Data includes full name, marital status, title, date of birth, gender, nationality, photographic identification, feedback and survey responses.
- Contact Data includes all billing addresses, delivery addresses, E-mail addresses and telephone numbers.
- Financial Data includes bank account and payment details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- Usage Data includes information about how you use our website.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

From time to time, we may also collect, use and share **Aggregated Data** (such as statistical or demographic data for any purpose); Aggregated Data may be derived

from your personal data, but it is not considered personal data in law as this data does not directly or indirectly reveal your identity. If however, we combine or connect your Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

From time to time, we may also collect **Special Categories of Personal Data** about you (such as details about your health); these will be disclosed only to individuals involved with your care such as emergency services and emergency call providers.

### Why We Collect It

The provision of the above information is required to enable us to perform a contract you have with us and/or our client, and pursuant to which we are appointed as their / your agent; this may include, but is not limited to, the following:-

The provision of the above information is required to enable us to perform a contract you have with us and/or our client, and pursuant to which we are appointed as their / your agent; this may include, but is not limited to, the following:-

- To contact you.
- To verify your identity.
- To register you as a new customer.
- To provide services to you, including customer service.
- To manage payments for services.
- To notify you about changes to our services.
- To provide customer support.
- To manage our relationship with you, which will include i) notifying you about changes to our terms and privacy policy and ii) asking you to leave a review or take a survey.
- To make suggestions and recommendations to you about goods or services that may be of interest to you.
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.
- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.

### Who We Share It With

From time to time, we may be required to share your personal data with the following categories of recipients for specific purposes:-

- **Service Providers** acting as processors who provide IT and system administration services, anti-money laundering service providers, tenancy deposit administrators and services to enable us to perform our contract with you.
- **Advertisers and Advertising Networks** including social media that require the data to select and serve relevant adverts to you.
- **Professional Advisers** acting as processors or joint controllers including lawyers, bankers, auditors, insurers, insurance brokers who provide consultancy, banking, legal, accounting and insurance services.
- **HMRC** acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- **Other Service Providers** acting as processors or joint controllers including maintenance contractors, utility providers and energy brokers and parking enforcement.

This data sharing enables us to perform our contract and / or terms and conditions as agent however, we will not share your personal data with any other third party; we will however share personal information with law enforcement or other authorities if required to do so by applicable law.

### **Where Your Personal Data May Be Held**

Your personal data may be held at our offices, and third party agencies, service providers, representatives and agents as described above.

We have robust security measures in place to seek to ensure that there is appropriate security for information we hold, including those measures detailed in our GDPR data protection policy.

### **How Long Will Your Personal Information Be Kept**

We retain your personal data whilst you use our services (or whilst we provide services connected to you) and for at least seven years thereafter, for legal, regulatory and accounting purposes.

If we need to retain your personal data for longer, we take into consideration the potential risks in continuing to store your data against why we might need to keep it; in some circumstances however, we might anonymise your personal data so it is not associated with you, and we may then use this information indefinitely.

### **Our Lawful Basis**

We rely on some or all of the following as the lawful basis on which we collect and use your personal data:-

- Performance of a contract.
- Consent (in relation to SMS and E-mail marketing communications etc.)
- Necessary for our legitimate interests (i.e. for running our business and to recover debts due to us, to develop our products and/or services and grow our business, to develop our service offering, to keep our records updated, to prevent against fraud and money laundering and for administration and IT services).
- Necessary to comply with our legal obligations.

## Your Legal Rights

Under the GDPR, you have a number of important rights which are free of charge; in summary, those include rights to:

- Fair processing of information and transparency over how we use your personal data.
- Access to your personal data and to certain other supplementary information that this privacy notice is already designed to address.
- Require us to correct any mistakes in your information which we hold.
- Require the erasure of personal data concerning you in certain situations.
- Receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to a third party in certain situations.
- Object, at any time, to processing of personal data concerning you for direct marketing.
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
- Object in certain other situations to our continued processing of your personal data.
- Otherwise restrict our processing of your personal data in certain circumstances.
- Claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on the rights of individuals under the GDPR.

If you would like to exercise any of those rights, please:

- E-mail us at [info@islingtonproperties.com](mailto:info@islingtonproperties.com) or write to us at Islington Properties Limited, 3rd Floor, 9 White Lion Street, London N1 9PD.

- Provide us with enough information to identify you (NB. your full name, E-mail address and property address will suffice).
- Provide us with proof of your identity and address (NB. a copy of your driving licence or passport and a recent utility or credit card bill will suffice).
- Confirm the information to which you request release, including any account or reference numbers which you may have been given.

## **Data Security**

Once we have received your personal data we will use reasonable and necessary procedures and security features to prevent unauthorised access and your personal data from being accidentally lost, or used or accessed in an unauthorised way (e.g. we limit who can access your personal data to those individuals and third parties who need to know it and who are subject to a duty of confidentiality).

If we become aware of a data breach, we will notify the Information Commissioner's Office, and likewise, if we believe that the data breach is serious, we may notify you in accordance with our legal requirements.

## **Complaints and Feedback**

If you would like to speak to us about how we handle your personal data, please contact our Data Protection Officer in the first instance at [info@islingtonproperties.com](mailto:info@islingtonproperties.com).

You can also complain to the Information Commissioner's Office who may be contacted at <https://ico.org.uk/concerns> or via telephone on 0303 123 1113.