

SnugPads Privacy Policy Revised 23rd May 2018

SnugPads commit to providing you with a high level of service throughout our relationship. We use the personal information you share with us to add value to our services and with the aim of making your experience even better.

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

This privacy policy explains what information we collect (which may be held on paper, electronically, or otherwise), when we collect it, how we use this, our dedication to protecting it, your rights and the options you have to control your personal information and protect your privacy.

It also outlines what personal information we collect about you when you contact us or otherwise engage with us via our website, social media or alternative methods. This could be using a variety of communication channels such as;

- a. In person
- b. Telephone
- c. Email
- d. Text message or MMS
- e. Post
- f. Through our social media accounts
- g. On Messaging services
- h. On our website SnugPads.com
- i. Via third party websites
- j. Through our online valuation tool
- k. Through property portals such as rightmove.co.uk, and Zoopla property group websites (Zoopla.co.uk, primelocation.com)

The policy also sets out how we use your personal information and the third parties we will share it with.

By engaging the services of SnugPads or by visiting our website www.SnugPads.com you are accepting and consenting to the practises described in this policy.

Who collects your information?

For the Purpose of the Data Protection Act 1998 (the Act) and the General Data Protection Regulation (GDPR) the Data Controller is SnugPads, Innovation Forum, Salford, M6 6FP.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number A8347398.

Any questions relating to this policy and our privacy practices should be send via the “contact us” form on our website at www.SnugPads.com

Updates to this policy

We will regularly review and update this privacy policy to ensure it is free from errors, contains appropriate information about your rights and our processing of your data, that it is implemented and that it is compliant with the applicable law. In the event that the policy is updated we will post a notification on our website along with an updated copy of the policy.

What personal information may we collect from you?

“Personal information” is any information that relates to you and identifies you personally, either alone or in combination with other information available to us.

We may collect and process the following personal information which you have provided by:

- a. Registering on our Website, entering details of your property requirements and signing up for property alerts.
- b. Filling in forms on our Website, social media accounts, third party websites and Portals which send information to us,
- c. In person,
- d. Communicating with us via telephone calls, emails, messaging services and through our social media account.

This information that you disclose when agreeing to register as an applicant or enter in to a transactional relationship with us, can include, but is not limited to;

- a. Personal information: Name, postal address, email address and telephone number
- b. Financial: Bank account details, including account number and sort code, and any hire purchase/loan agreements/credit cards or store cards that you have;
- c. Socio-Demographic information: Details about your employment status (including email and phone numbers) of the employer/accountant, payroll numbers, length of employment, salary information (including any regular overtime or commission), and any other income received; nationality, education (esp. students)
- d. Transactional: Details of payments you make to us
- e. Contractual: Details about the products or services we provide to you
- f. Communications: What we learn about you from letters, emails and conversations
- g. Open data and public records: e.g. Electoral information, internet, Newspapers

h. Documentary Data: e.g. copies of ID

i. Consents: how we can contact you

j. National Identifiers: e.g. National Insurance Number

k. Connected Persons: Guarantor and/or Next of Kin name, e-mail address, telephone number, Date of Birth, address (including any previous addresses), marital status, National Insurance Number, nationality, next of kin.

To ensure the safety of our team when they are attending external appointments, such as property viewings, marketing appraisals, inspections and inventories we require contact details for the client or customer, including a residential address in the UK.

Information required to comply with legislation such as Right to Rent checks required under Section 22 of the Immigration Act 2014 if you are renting a property and The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (more commonly referred to as the Money Laundering Regulations 2017) if you are buying or selling a property through us.

Information to enable us to tailor our marketing and communications to you based on your personal preferences, such as type of services required, budget, specifications of your property search.

If you contact us, we may keep a record of that correspondence and ask for information if you report an issue with our services, or an issue at the property you are renting.

We may also ask you to complete surveys, either on our own Website, social media, or through a third party provider, which we use for research purposes; although you do not have to respond to them.

What information is collected through our website?

When you visit or otherwise access our website, we may collect details including but not limited to:-

a. Information about the device and browser you are using to access the Website e.g. type, version, operating system, etc.

b. Traffic data including the URL of the website that referred you to our website if applicable

c. Location data including geolocation (you are able to control the location data which is being collected using the settings on your browser/device)

d. Weblogs and other communication data,

e. The resources that you access including social media interaction.

f. Your IP (Internet Protocol) address,

g. The date and time of the visit and how long you remained on our Website,

h. The pages visited on our Website and interactions performed,

You consent to any information concerning you which we collect and process being used, stored and processed in accordance with this Policy.

When you visit one of our websites, we may send you a cookie. A cookie is a small file which is placed on your computer or device to enable us to identify your device or allow the website framework to run effectively. We only use cookies that are strictly necessary to enable you to move around the site, to provide certain basic features, to enhance the functionality and to improve the performance of the website. For more information on cookies and how we use them, please read our Cookie policy on our website.

External links

Our website, our social media accounts and digital correspondence may contain links to third party sites we have no control over, if you visit those sites you should check you are happy with their own privacy policies and terms of use before providing any personal information. In addition, if you linked to our website or social media accounts from a third party, we cannot be responsible for the privacy policies and practices of that third party site.

Downloads and media

Any downloadable media such as documents, files images etc. on our website, our social media accounts and digital correspondence are provided to you at your own risk. We take reasonable precautions to ensure that such files are free of virus but we recommend that you use anti-virus software as a precaution. We accept no responsibility for downloads and media provided by third party websites.

How do we use your personal information?

The personal information we collect when you first contact us will be used for identification and authentication purposes in addition to creating a profile for you with the information needed to provide you with our relevant products or services. We use and analyse this personal information where necessary for the following purposes detailed below:

- a. Improving our products and services: we will use your personal information to build a profile on you in order to understand your requirements, to improve our Website, as well as to personalise the properties and services we offer you. We process your personal information in this way as it is necessary for the purposes of our legitimate interests in providing better products and services for you and our other customers.
- b. Processing your transaction: we use relevant personal information described above (including your name, address and financial details) to enable us to complete a transaction with you, such as buying, selling, renting or letting a property through us. This information may be required to be passed on to third parties, including solicitors, surveyors, financial advisors etc.
- c. Preventing fraud: we will also use your personal information to assess your creditworthiness (in the case of buying or renting a property) and to prevent fraud. For this purpose, we may need to share your personal information with our referencing providers and/or solicitors (see "how we share

your personal information” below). This is necessary for the purposes of our legitimate interests in ensuring we are not the victim of fraud and to protect our legal rights.

d. To provide customer support: if you contact our team (or vice versa), we will use personal information such as your email address, phone number and residential address as well as your contact history to process your request and provide you with the best service possible. We will process your personal information in this way if it is necessary for the performance of a contract or if it is required for us to comply with any legal obligations. If it is not necessary to process your personal data for either of these reasons we will process it as it is necessary for the purposes of our legitimate interests in ensuring we can provide the best service possible.

e. Marketing: when you sign up to receive our newsletters (if appropriate), register as an applicant, enter in to a transaction with us, provide feedback on our service online or use our Website; we will use your personal information to create a profile based on the information we hold about you. This is necessary for the purposes of our legitimate interests in ensuring we have accurate information about you in one place. We create your profile in accordance with your preferences in order to provide you with the best personalised experience, to send you personalised marketing messages and newsletters and for opinion research purposes. Below you can find a more detailed description of the ways in which we will use your personal information for these purposes.

f. Website user experience: if you are logged in to your Account on our Website we may alter the way the website works to improve and/or enhance the information displayed to you, or to optimise the way you interact with the Website. We may show personalised content based upon your previous interactions with the website.

What kind of information do we collect?

The way you interact with us across all the different channels described above (e.g. our Website, social media and marketing messages we send you) and the information we collect in that regard from each of these channels provides us valuable information about your current circumstances and preferences. This insight gives us the opportunity to offer you the best customer service experience possible. To learn about you and your interests, we may analyse your interactions with us using various kinds of information, as set out above. If you have given us your consent to send you marketing communications or if we are permitted by law to send such communications without obtaining your consent, we use the information that you have provided to us when interacting with us for sending you personalised marketing messages about our products or services, events and promotions. In some instances, we will also aggregate your personal information with that of other individuals, to create comprehensive reports about how clients and customers use our products and services. This is necessary for the purposes of our legitimate interests in analysing our brand and determining how to improve our services.

How may we share your information?

The information you provide to us will be treated as confidential and will be processed only by any third party, acting on our behalf, within the UK/EEA. This information will only be shared as necessary and only for the purposes and on the lawful grounds described in this policy.

Who may we share information with?

We require that third parties with whom we may share your information, adhere to strict rules when processing your information in accordance with our specific instructions (such as contacting you to arrange access for necessary repairs) and the applicable laws.

These third parties who may process your personal information on our behalf (data processors) include but are not limited to;

If we enter into a joint venture with or merged with a business entity, your information may be disclosed to our new business partners or owners as one of the transferred assets.

Tenant referencing agencies, landlords or managing agents, Money Laundering referencing, Anti Money Laundering verification agencies, contractors, surveyors, utility companies, insurance providers, fraud prevention agencies, HMRC, regulators and other authorities.

If you are unable to make payments under your contractual obligations or tenancy agreement, your information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you;

In the creation, renewal or termination of a tenancy, your information will be disclosed to the relevant local authority, tenancy deposit scheme administrator, service/utility provider, freeholder, factor, facilities manager or any other relevant person or organisation in connection with this.

If you are a tenant in a property which is being sold, it is necessary that your data may be disclosed to the new owner and their solicitors.

Solicitors/conveyancers, surveyors, financial/mortgage advisors, contractors and other property agents where there is a chain.

How you provide us with the personal information of others

Prior to disclosing the personal information of others to SnugPads, such as guarantor, next of kin, tenant, landlord or employers you must gain their consent for the disclosure and the processing of their information under this policy.

How long will we keep your information?

We will keep your information for as long as you are a client of SnugPads. The length of time we retain your information will depend on the lawful basis in which it was collected and processes.

Where a transaction has been entered into and there is a contractual reason, or where we must comply with legal obligations (e.g. Money Laundering Regulations, The Property Ombudsman Code of Practice)

Where consent has been given and where there is a legitimate interest to do so, such as where a client has registered their interest in buying, letting, selling or renting a property through us, we will retain data for a period of two years.

Where a client has registered on our website, we will delete your information if you have not accessed or maintained the account within one year, or where a client has breached our terms and conditions.

Your rights

You have the right at any time to:

a. Ask for a copy of the information about you held by us. Please note that we will need to see proof of identity prior to processing such request. b. Require us to correct any inaccuracies in your information.

If you would like to make changes to the data held, enforce your 'Right to Erasure/The Right to be Forgotten' to be provided a copy of your data in a useable electronic format (Right to Data Portability) or for a subject access requests, please email us. We will comply with these requests in line with applicable law

The Information Commissioner

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

England:

Information Commissioner's Office

Wycliffe House, Water Lane

Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

Scotland:

The Information Commissioner's Office – Scotland

45 Melville Street, Edinburgh, EH3 7HL

Telephone: 0131 244 9001

Wales:

Information Commissioner's Office

2nd floor, Churchill House

Churchill way, Cardiff, CF10 2HH

Telephone: 029 2067 8400

Northern Ireland:

Information Commissioner's Office

3rd Floor, 14 Cromac Place

Belfast, BT7 2JB

Telephone: 028 9027 8757