

## Anchor Property Solutions Limited Privacy Policy

### Introduction

Welcome to the privacy policy of Anchor Property Solutions Limited (**APSL**).

APSL respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Please use the Glossary towards the back to aid your understanding of the meaning of some of the terms used in this privacy policy.

### **1. Important information and who we are**

#### Purpose of this privacy policy

This privacy policy aims to give you information on how APSL collects and processes your personal data, including any data you may provide during our initial consultation, should you decide to purchase a service or during the course of our engagement with you.

We do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

#### Controller

APSL is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

#### Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Anchor Property Solutions Limited

Email address: [info@anchorproperty.co.uk](mailto:info@anchorproperty.co.uk)

Postal address: 9 De Montfort Street, Leicester, Leicestershire LE1 7GE

Telephone number: 07791 572 408

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your engagement with us.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, residential address, email address and telephone numbers.
- **Financial Data** includes bank account, payment card details, credit history and mortgage application details.
- **Transaction Data** includes details about any payments to and from you (whether by/to us or a third party during the course of our engagement with you) and other details of services you have purchased from us.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We do not collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We do not collect any information about criminal convictions and offences.

#### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the appropriate services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us directly by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our services;
  - during our initial assessment of your requirements;
  - subscribe to our service or publications;
  - request marketing to be sent to you; or
  - give us feedback or contact us.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties such as those set out below:
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as financial advisors, mortgage brokers, crew advisory bodies based inside the EU.
  - Identity and Contact Data from publicly available sources such as Companies House and HM Land Registry.
  - Identity, Contact, Financial and Technical Data from other professional advisers and agents such as Estate Agents, Mortgage Brokers, Bankers and Solicitors.

#### **4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Please see the Glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data. Where we are relying on consent to process your personal data you may withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide the services your relative requires. We will advise you if this is the case at the time you withdraw your consent.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact (c) Financial (d) Marketing and Communications	Performance of a contract with you
To process and deliver our services including:  (a) Manage payments, fees and charges owed to us and other third parties.  (b) Collect and recover money owed to us  (c) providing you with information in respect of various properties of interest to you	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To administer and protect our business including monitoring the information provided in correspondence with you (both sent and received)	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation
To use data analytics to improve our services, marketing, customer relationships and experiences	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)]

### Marketing

We may provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity and Contact Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased or services from us and you have not opted out of receiving that marketing.]

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us using the details set out above at any time].

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

#### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details set out above.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **5. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above.

- External Third Parties as set out in the Glossary; or
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **6. International transfers**

Some of our external third parties are based outside the EEA so their processing of your personal data may involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it.

We cannot guarantee the safety of your personal data should you access your personal data using a service provider outside of the EEA. You should consider the privacy policy of any service provider prior to accessing any personal data outside the EEA.

Any transfer of your personal data to you which extends outside of the EEA is only to be made where necessary for the performance of our services to you and by signing this document you are providing APSL with your informed consent to such transfers.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

You have the following rights with respect to your personal data:

- a right of access to a copy of the information comprised in the data held by us in relation to you. You may contact us using the details provided at the beginning of this policy to make such a request;
- a right to object to processing that is likely to cause or is causing damage or distress;
- a right to prevent processing for direct marketing;
- a right to object to decisions being taken by automated means and to have the logic behind these decisions explained;
- a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed. **It is important that the personal data we hold about you is accurate and**

**current. Please keep us informed if your personal data changes during your relationship with us;** and

- a right to claim compensation for damages caused by a breach of Data Protection Law.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us using the details set out above.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### THIRD PARTIES

#### External Third Parties

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, mortgage broker, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

- Estate Agents who require your details in order to process any offer you decide to make in relation to a property introduced to you by us.

By signing this agreement you confirm your agreement to the terms set out above with respect to the processing of your data, and confirm that the data you provide to us is accurate to the best of your knowledge and belief.

Signed by and on behalf of Anchor Property Solutions Limited

Date

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Signed by Data Subject

Date

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Signed by Data Subject

Date

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