

# Privacy

## Your personal information

This privacy policy explains how we collect and process your personal data. Personal data, or personal information, means any information about an individual from which that person can be identified. This includes information that you tell us, what we learn from you and the choices you make about the marketing you want us to send to you. This policy explains how we do this, what your rights are and how the law protects you.

## Changes to data protection law

The law in relation to data protection is changing on the 25 May 2018 when the General Data Protection Regulation comes into force in the United Kingdom and across Europe.

This version was last updated on 17<sup>th</sup> May 2018. Your use of our website and services will be subject to the most current version of this privacy policy posted on our website at the time of your use. We recommend that you check the website from time to time to inform yourself of any changes in this policy or any of our other terms, and you are solely responsible for reviewing and becoming familiar with any modifications to this privacy policy.

### 1. Who we are and how you can contact us

We are Currell Group Limited. Our registered office is at 9 Bonhill Street, London, EC2A 4DJ.

You can contact us by email at [DPO@currell.com](mailto:DPO@currell.com).

Our representative for all queries in relation to this policy and your data protection rights is Chris Brand.

When we refer to our website, we mean our website at <https://www.currell.com>.

### 2. Where we collect your personal information from

We may collect personal information about you in the following ways:

#### Data you give to us:

- Data you give to us when you register to use our services
- When you talk to us on the phone or in one of our offices
- When you use our website
- In emails or letters to us
- When you give us feedback

#### Data we collect when you use our services:

- Payment and transaction data if you are selling or letting a property through us or if you are renting a property we have listed.
- Profile and usage data, including data we gather from the devices you use to connect to those services such as computers and mobile phones, using cookies (please see our separate cookies policy at <https://www.currell.com/cookies>) and other internet tracking software.

### **Data from third parties we work with:**

- Credit reference agencies
- Social networks, such as Facebook, LinkedIn, Twitter, Instagram
- Public information sources, such as the Land Registry and Companies House
- Agents and Advisors working on our behalf

### **3. Data we collect about you**

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

Identity data – name, username, title and date of birth.

Contact data – property address, correspondence address, email address or telephone numbers.

KYC data– photographic identification (such as a copy of your passport/ driving licence) and proof of address documentation (such as a copy of your bank statement/ utility bill).

Conflict check data – name of your relative or connection working with us.

Financial data – bank account and payment card details, company accounts, financial records, credit references and trade references.

Transaction data – details about payments to and from you and other details of services you have purchased from us.

Technical data - internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.

Profile data - your username and password, details of previous transactions or enquiries made by you, your interests, preferences, feedback and survey responses.

Usage data – information about how you use our website, products and services.

Marketing and communications data – your preferences in receiving marketing from us and our third parties and your communication preferences.

Special Categories data - We may collect special categories of personal data about you. This includes details about race or ethnicity, We may ask you to confirm the number of occupants in your property (both adults and minors), their date of birth and your relation with them. This data is more sensitive and can only be processed in specific circumstances.

In circumstances where you are not the legal owner of a property, we will request details from you as to your ability to sell or let the property (such as a grant of probate or a power of attorney).

We may check your suitability to rent or buy a property on behalf of our clients. In such instances, Criminal conviction and offences information may be brought to our attention where we share your data with referencing agencies for the purposes of highlighting any crime, fraud or money laundering,

We 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 is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect 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.

In some cases we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes and to carry out routine internal reporting. We may use this data indefinitely but at this point it would no longer be deemed 'personal data'.

#### 4. How we use your personal information

Your privacy is protected by law.

We are only allowed to use personal information about you if we have a legal basis to do so, and we are required to tell you what that legal basis is. We have set out in the table below: the personal information which we collect from you, how we use it, and the legal ground on which we rely when we use the personal information.

In some circumstances we can use your personal information if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on our legitimate interests, we have set that out in the table below. The table below applies to you whether you are selling, buying, letting, or renting a property.

<b>What we use your personal information for</b>	<b>What personal information we collect</b>	<b>Our legal grounds for processing</b>	<b>Our legitimate interests (if applicable)</b>
To register you as a new client	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• KYC</li> <li>• Conflict Checks</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>	
To process and deliver our services to you.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> <li>• Special Categories</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Legitimate interests</li> <li>• Consent</li> <li>• Compliance with legal obligations including information submitted to the continuous recording of lettings and sales in social housing in England (referred to as CORE – please see below).</li> </ul>	To undertake an adequate risk assessment, ensure prevention and detection of crime, fraud and/or money laundering and checking your suitability to buy or rent a property on behalf of our client.
To manage payments or collect and recover money owed to us	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Legitimate interests</li> </ul>	To recover any debts owed to us
To manage our relationship with you, including notifying you about changes to our terms or privacy notices	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Legitimate interests</li> </ul>	To keep our records up to date
To deliver relevant	<ul style="list-style-type: none"> <li>• Identity</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>	To study how clients use

website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> <li>• Contact</li> <li>• Marketing and communications</li> <li>• Usage</li> <li>• Profile</li> </ul>		our services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products / services, marketing, client relationships and experiences	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> <li>• Profile</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>	To define types of clients 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 services that may be of interest to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing and communications</li> <li>• Technical</li> <li>• Profile</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>	To develop our services and grow our business

## 5. Who we share your personal information with

We may share your personal information with any of the following organisations, for the purposes of providing the services which you have requested from us:

- Group companies
- Sub-contractors (For example those who deal with the maintenance of properties or inventory clerks).
- Utility Suppliers
- Agents and advisers that we use
- Credit reference agencies
- Debt collection agencies
- HM Revenue & Customs, the local authority and other regulators or governmental authorities
- External service providers that provide applications/functionality, data processing or IT services to us (For example, we use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. These include providers of IT services, cloud-based software as service providers, website hosting and management, data analysis, data backup, security and storage services.
- We may submit data to the continuous recording of social housing lettings and sales system (CORE) as part of our legal or contractual obligation to do so. CORE is a national information source funded by the Ministry of Housing, Communities and Local Government that records information on the characteristics of both private registered providers and local authority new social housing tenants and the homes they rent. CORE processes data in accordance with the data protections in the GDPR. Please refer to their website for further details.

We require all organisations who we share your data with to respect the security of your personal data and to treat it in accordance with the law. We do not allow any of our 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. Failing 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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **7. Third party links**

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice or policy of every website you visit.

## **8. Transferring your personal information outside the EEA**

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal information outside the EEA we have to tell you.

We will only send your data outside the EEA:

- If you have instructed us to do so;
- To comply with a legal duty; or
- To work with our suppliers who help us provide our services.

We may share your personal data with some third-party companies such as data processors to provide technology for email, subscription and payment support. Some of these companies may be based outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA

## **9. 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 (including the ICO) of a breach where we are legally required to do so.

## **10. How long do we keep your personal information**

We will keep your personal information for as long as you are our client.

After you stop being a client, because you have stopped regularly using our services, we may keep your personal information for 7 years for one of the following reasons:

- to respond to any questions or complaints from you
- to maintain our records
- to comply with laws applicable to us
- to comply with our professional indemnity insurance policies.

If you have made an enquiry with us, but you have not proceeded to use our services, we may keep your personal information for 6 years for purposes of sending you further information, in relation to your interest in using our services to buy, rent, sell or let a property.

If we have provided professional/ consultation advice to you as part of our services, we will retain your personal information for 15 years in order to defend any claims of negligence made against us.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

## **11. Marketing**

We may use your personal information to tell you about relevant services.

We can only use your personal information to send you marketing messages if we have either your consent or a legitimate interest to do so.

You can ask us to stop sending you marketing messages at any time – you just need to contact us, or use the opt-out links on any marketing message sent to you.

We will get your express opt-in consent before we share your personal data with any company outside our group of companies for marketing purposes. You can ask a third party company to stop sending you marketing messages at any time, by adjusting your marketing preferences in relation to that company or by using the opt-out links on any marketing message sent to you.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of purchasing our services or any other transaction between you and us.

## **12. Your rights**

You have certain rights which are set out in the law relating to your personal information. The most important rights are set out below.

### Getting a copy of the information we hold

You can ask us for a copy of the personal information which we hold about you, by emailing us at [DPO@currell.com](mailto:DPO@currell.com) . This is known as a data subject access request.

You will not have to pay a fee to access your personal data, unless we believe that your request is clearly unfounded, repetitive or excessive. In such circumstances we can charge a reasonable fee or refuse to comply with your request.

We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month and in that case we will notify you and keep you updated.

### Telling us if information we hold is incorrect

You have the right to question any information we hold about you that you think is wrong or incomplete. Please contact us by email at [DPO@currell.com](mailto:DPO@currell.com) if you want to do this and we will take reasonable steps to check its accuracy and, if necessary, correct it.

### Telling us if you want us to stop using your personal information

You have the right to:

- object to our use of your personal information (known as the right to object); or
- ask us to delete the personal information (known as the right to erasure); or
- request the restriction of processing; or
- ask us to stop using it if there is no need for us to use it (known as the right to be forgotten).

There may be legal reasons why we need to keep or use your data, which we will tell you if you exercise one of the above rights.

### Withdrawing consent

You can withdraw your consent to us using your personal information at any time. Please contact us by email at [DPO@currell.com](mailto:DPO@currell.com) if you want to withdraw your consent. If you withdraw your consent, we may not be able to provide you with certain products or services.

### Request a transfer of data

You may ask us to transfer your personal information to a third party. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

## **13. Making a complaint**

Please let us know if you are unhappy with how we have used your personal information by contacting us by email at [DPO@currell.com](mailto:DPO@currell.com).

You also have a right to complain to the Information Commissioner's Office. You can find their contact details at [www.ico.org.uk](http://www.ico.org.uk). We would be grateful for the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.