

PRIVACY POLICY

This policy describes how



Charlton Grace HW Ltd (Company number 12709746) and Charlton Grace Lettings at 3 Hartley Mews, Hartley Wintney RG27 8NX will use your personal data.

All companies are data controllers of your personal data.

It also describes your data protection rights, including a right to object to some of the processing which we may carry out. More information about your rights, and how to exercise them, is set out in the "What rights do I have?" section of this policy.

Summary of how we use your data

We use your personal data:

- to deliver services to you, to send you information about properties and property related services you may request of us or that we think will be of interest to you, also to conduct searches about your identity, your current and past residency addresses, and your right to live in the UK and credit history to meet applicable laws and to provide a recommendation to landlord clients, on your suitability as a tenant
- to carry out our obligations arising from any contracts entered into by you, us or which it is contemplated may be entered into
- to notify you of changes to our services;
- to process a job application;
- to process your application for each company;
- for administrative and business purposes;
- for advertising and analytical purposes;
- in connection with our legal rights and obligations and to pursue our legitimate interests;
- for certain additional purposes but only with your consent.
- We may share information about you with others as described in this policy who have undertaken to hold your personal data in compliance with applicable laws.
- Where we rely on your consent for direct marketing purposes, you can withdraw this consent at any time.

What information do we collect?

We collect and process personal data about you when you interact with us and our websites and when you register with us to receive our services. Other than the personal data which you give us (which will usually include, name, address, telephone number, email address, date of birth, credit history, previous addresses, identification) in response to requests from us or other parties to a transaction which you are participating in, information that we collect from you includes:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your website visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); pages 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), and methods used to browse away from the page.

Telephone Call Recording

We may operate call recording in their offices:

It is in our legitimate interests to record calls unless those interests are overridden by you by asking for your call not to be recorded. In that case, we may ask you to contact us by email or in writing.

- You will be informed if call recording is in operation
- Personal data revealed during a telephone call will be digitally recorded, for example name and contact details, to deliver services to you or for your benefit.

How Call Recordings may be used:

- respond to any questions, complaints or claims made by you or on your behalf;
- show that we treated you fairly
- keep records required by law
- protect the interests of you, our staff or both

All call recordings are held securely.

What information do we receive from third parties?

Sometimes, we receive information about you from third parties. In particular:

- through enquiries and website visits;
- Social Media Companies including Facebook, Instagram when you interact with our brand through these platforms;
- Live chat suppliers partnered with us through Live Chat applications if hosted on our website;
- Previous or current landlords for the purpose of referencing;
- Enquiries through property portals when you request further information on a property or request information or contact from one of us;
- Financial advisors, mortgage brokers, lenders and solicitors/conveyancing agents through transactions relating to the service we are providing; and
- Other agents/companies as and when required for purposes which will be disclosed to you at the time.

The Purposes for using your personal information and legal basis for this use

We process your personal data for the following purposes:

- To fulfil a contract, or in preparation of a contract by, for example providing our services, including processing information in connection with a property's sale or letting, arrangements for the transfers of funds, provision and sales of related services e.g. mortgages or conveyancing by or to third parties, end of contract arrangements;
- We may use your information to provide services to you before we have a contract with you (for instance sending potential buyers and tenants property details), and to respond to any comments or complaints you may send us
- As required by us to conduct our business and pursue our respective legitimate interests, for example:
 - to monitor use of our websites and online services, and to help us monitor, improve and protect our products, content, services and websites, both online and offline, including as set out in our Cookie policy below;
 - the Company uses information you provide to personalise our website, products or services for you, including as set out in our Cookie policy below;
- Where you give us consent we will send you direct marketing in relation to products and services, provided by us, members of our group of companies and selected third parties
- On other occasions when we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law, for
- for example:
 - to verify your identity; and
 - in response to requests by government or law enforcement authorities conducting an investigation.

Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although there may be other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our respective legitimate interests or for delivery related services which are required for us to deliver the services we have contracted or preparing to contract with you.

You have an absolute right to opt-out of direct marketing or profiling we carry out for direct marketing, at any time. You can do this by following unsubscribe instructions contained in the communication, or by contacting us using the details set out below.

Who will we share this data with, where and when?

We will share your personal data with companies in the same group of companies as us (Charlton Grace HW Ltd, Charlton Grace and Charlton Grace Lettings) and third parties detailed in the section below for the purpose of providing a service to you, under our legitimate interests and understanding your use of our products and services. We will not sell or provide your information to third parties other than to parties with whom we have entered into contracts which require them to comply in all respects with the requirements of this Privacy Policy and all legal requirements relating to information privacy.

We may share your data with or on:

- Mortgage brokers we are partnered with for mortgage services, protection requirements and advice;
- Independent financial advisors for advice relating to your property;
- Solicitors and conveyancing agents for legal advice relating to your property;
- Any other named party to a signed contract entered into by you in accordance with your instructions, such as your landlord or tenant;
- Third parties who provide services to the property for maintenance, required checks for the property and repairs including but not limited to plumbers/electricians/builders/carpenters;
- Surveying companies for surveying services required for the sale/purchase of your property;
- Utilities companies where we are required to do so to adhere to a tenancy agreement or for utility switching purposes;
- Referencing companies to obtain references for letting a property;
- Deposit protection schemes for registration of a deposit;
- The preparation of Home reports in Scotland;
- Block managers where a let property is a leasehold property;
- Inventory companies who conduct check ins and check outs;
- Insurance and warranty companies for both introduction to products and for information requested to process any claims;
- Alternative deposit scheme companies;
- Photographers for photography;
- If you provide a credit or debit card as payment, we may use third parties to process the payment and to check the validity of the sort code, account number and card number you submit in order to prevent fraud;
- Third parties who we contract to provide administration services and sales of related products and services required for the purposes of delivering the services and products to you;

- In connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation);
- Third parties such as The Property Ombudsman to investigate any complaints received from you or from others, about our services or the properties which we deal with;
- Third parties to undertake market research on our behalf;
- Third parties for the purposes of confirming your identity and complying with AML and “right to rent” requirements;
- Software platforms to facilitate email marketing ;
- Audit purposes;
- Debt collection companies;
- E-signature companies for online signatures;
- Property CRMs in order to manage your data;
- Other software solutions to help provide the services to you for example, property maintenance online reporting, Identity check platforms, sales progression software, material information and other compliance requirements e.g property licensing;
- Website hosting companies for website hosting;
- Property specialist advisors for specialist advice;
- Property auction companies for auctioneering services;
- Telephone answering service and online chat providers in order for us to process your data to fulfil our requirements;
- Internal client CRMs for client management services;
- Lead Management providers to help us to process enquiries;
- Accountancy software in order to fulfil our services;
- HMRC and regulatory authorities in order to fulfil our services.

Personal data may be shared with government authorities /or law enforcement officials, if required for the purposes above including any required information sharing or platforms for publication of legally required information, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

In the event that we sell or integrate our business with another business, your details will be disclosed to our advisers and any prospective purchaser’s adviser and will be passed to the new owners of the business.

How long will you retain my data?

Where we process data in connection with performing a contract, we keep the required property elements of the data for up to 10 years from your last interaction with us. Where we process personal registration data, we do this for as long as you are an active user of our services.

Where we use personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests).

We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

COOKIES AND SIMILAR TECHNOLOGIES

What are they?

Cookies are small pieces of information sent by a web server to a web browser which allows the server to uniquely identify the browser on each page. Other tracking technologies are also used which are similar to cookies. This can include pixel tags and tracking URLs.

All these technologies are together referred to in this Policy as “Cookies”.

How do we use Cookies?

The types of Cookies that we use on our website, and the purposes for which they are used, are set out below:

- **Strictly necessary cookies:** These cookies are essential in order to enable you to move around our website and use its features, such as accessing secure areas of our site. Without these cookies, any services on our website you wish to access cannot be provided.
- **Analytical/performance cookies:** These cookies collect information about how you and other visitors use our site, for instance which pages you go to most often, and if you get error messages from web pages. We use data from these cookies to help test designs and to ensure a consistent look and feel is maintained on your visit to the website. All information these cookies collect is aggregated. It is only used to improve how a website works.

We use Google Analytics, for example, to anonymously track website usage and activity. Google Analytics is a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. In case of activation of the IP anonymization, Google will truncate/anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. On behalf of the website provider Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage to the website provider. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality

of this website. Furthermore, you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage...> You can refuse the use of Google Analytics by clicking on the following link. [Disable Google Analytics](#)

Further information concerning the terms and conditions of use and data privacy can be found at <http://www.google.com/analytic...> or at https://www.google.com/intl/en_uk/policies/. Please note that on this website, Google Analytics code is supplemented by "anonymizelp" to ensure an anonymized collection of IP addresses (so called IP-masking).

- **Functionality cookies:** These cookies allow our site to remember choices you make (such as your username, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting. Additionally, these cookies can be used to allow an optional service to function such as offering a live chat session. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.
- **Targeting cookies:** These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. These cookies are dropped only with your consent. You can give your consent either by closing the cookie banner displayed at the bottom of the landing page of our website or browsing the website outside the cookie banner and clicking on any of its item. Please note that we track your consent using a technical cookie; therefore, in the event you delete any cookies stored on your devices you see the cookie banner once again. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.
- **Social media cookies:** These cookies allow you to share what you've been doing on our site on social media such as Facebook and Instagram. These cookies are not within our control. Please refer to the respective privacy policies for how their cookies work.
- **Pixel tags:** Also known as a clear GIF or web beacon. These are invisible tags placed on certain pages of our Site but not on your computer. When you access these pages, pixel tags generate a generic notice of that visit. They usually work in conjunction with cookies, registering when a particular device visits a particular page. If you turn off cookies, the pixel tag will simply detect an anonymous website visit.
- **Tracking URLs:** These are used to determine from which referring website the website is accessed.

If you do not want to allow Cookies at all, or only want to allow use of certain Cookies, please refer to your browser settings. You can also use your browser settings to withdraw your consent to our use of Cookies at any time and delete Cookies that have already been set. Please note that by deleting our cookies or disabling future Cookies you may not be able to access certain areas or features of our site.

To find out more about Cookies please visit: www.allaboutcookies.org or see www.youronlinechoices.eu which contains further information about behavioural advertising and online privacy.

Changes to our Privacy Notice

Any changes we may make to this policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our policy.

What rights do I have?

You have the right to:

- access your personal information and to be informed about its use by us
- correct your personal information;
- have your personal information deleted;
- restrict the use of your personal information;
- object to the use of your personal information;
- complain to the Information Commissioner's Office;
- withdraw your consent to the use of your personal information;
- ask for the personal information to be transferred.

UNDER 18?

We are especially concerned with protecting the privacy of children/minors. If you are under the age of 18, you must obtain your parent/guardian's permission before providing any personal information. When providing personal information your parent/guardian should be with you to help you through this process.

Accessing your information

The accuracy of your information is important. If the personal information you have provided to us changes, if you change email address, or any of the other information we hold, please email the office who have been delivering the services and products to you.

Security Measures

We will ensure that your personal information is held securely.

Some of your "non-sensitive" details (such as your email address) may be transmitted over the internet and this can never be guaranteed to be 100% secure.

Other websites

Our websites may contain links to other websites which we do not own but this privacy policy only applies to our website and we cannot be responsible for the privacy policies and practices of other sites whether or not you access them using links from our websites.

How do I get in touch with you?

Please contact either company directors by emailing lee@charltongrace.co.uk or mark@charltongrace.co.uk – please see charltongrace.co.uk for more information.

Who can you complain to?

In addition to sending us your complaints directly to katie@charltongrace.co.uk you can send complaints to our supervisory authority. As Charlton Grace predominantly handles the personal data of UK nationals, our supervisory authority is the Information Commissioner's Office. If you believe that we have failed in our compliance with data protection legislation, complaints to this authority can be made by visiting ico.org.uk.