

Copper Violet Privacy Policy

This privacy notice will inform you about your privacy rights. This privacy notice shall supersede any contract with us to purchase a product or service. When you give us personal data, you are consenting to its collection and use in accordance with our privacy notice. This privacy notice will inform you as to how we look after your personal data which you provide to us when you enter a contract with us to purchase a product or service, whether on behalf of an organisation or personally, or make any payments to us, or make an enquiry to us, visit our website at www.copperviolet.co.uk.

If you share personal data on behalf of someone else, you are confirming that you have given them the information in this privacy notice and that they have agreed for us to use their personal data in the way we describe in this privacy notice. You are not allowed share anyone's personal information without their consent.

Copper Violet Limited adhere to, and are registered under, the Data Protection laws in the United Kingdom. We are diligent to prevent unauthorised access to and use of your personal information. Copper Violet Limited respects your privacy and is committed to protecting your personal data.

1. Important information

Purpose of this privacy policy

This privacy notice is to give you information on how Copper Violet Limited collects and processes your personal data which you provide to us when you enter a contract with us to purchase a product or service (whether on behalf of an organisation or personally), make payment to us, make an enquiry to us, visit our website (regardless of where you visit it from) or otherwise. We only collect data relating to children in regard to permitted occupants into relation to providing a AST agreement. It is important that you read this privacy notice together with any other documents provided so that you are fully aware of how and why we are using your data / personal information.

Controller

Copper Violet Limited is the controller and is responsible for your personal data (collectively referred to as the "Company", "we", "us" or "our" in this privacy notice). We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

Copper Violet Limited, 1 Midland Road, Wellingborough, Northamptonshire, England, NN8 1HA. – FAO: Data Privacy Manager lettings@copperviolet.co.uk.

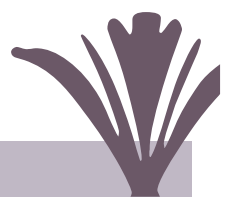
You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first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

Changes to the privacy notice and your duty to inform us of changes

This version was last updated in April 2018 and historic versions can be obtained by contacting us. 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.

Third-party links on our website

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 of every website you visit.

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, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card 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 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 and systems.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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 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 feature of our website. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this privacy notice. We do not collect any 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). Nor do we collect any information about criminal convictions and offences.

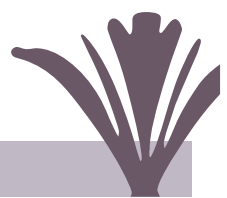
If you fail to provide personal data

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 with you (for example, to provide you with products 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.

3. How is your personal data collected?

We may 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 by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account with us (on our website or otherwise);
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or



- give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources.

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:

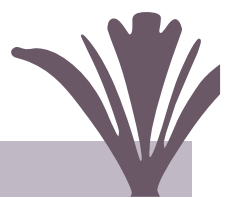
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory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

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or contact	(a) Identity (b) Contact	Performance of a contract with you or a third party
To process and deliver your order/instructions including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & 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 notice (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing & 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)



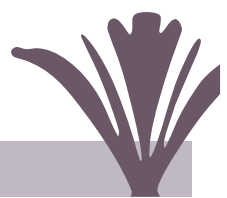
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/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, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and 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 products or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

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

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile 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, offers and other information (such as in respect of events we may run or news updates we may provide) may be relevant for you (we call this marketing).



You may receive marketing communications from us if you have requested information from us, purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have opted-in to receive that marketing and have not subsequently opted out of receiving that marketing.

Third-party marketing

We will also get your express opt-in consent before we share your personal data with any company outside the Company (or our group) for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Cookies

We may use cookies to monitor how people use our website. This helps us to understand how our customers and potential customers use our website so we can improve things like layout, function and design. A cookie is a piece of information stored on your computer's hard drive that records how you have used a website. The next time you visit that website, it can tailor your options based on the information it has stored about your last visit. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

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. 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

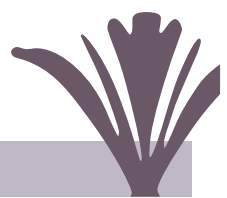
We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- 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 notice.

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

6. International transfers

We do not knowingly transfer your personal data outside the European Economic Area ("EEA"). However, some External Third Parties may run their operations outside of the EEA. Although they may not be subject to the same data protection laws as organisations based in the UK, we will take steps to make sure they provide an



adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside of the EEA.

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 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. Details of retention periods for different aspects of your personal data are available from us by request. Please be aware that, by law, we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes and for 7 years for Anti-Money Laundering Regulations. In some circumstances you can ask us to delete your data. Please see below for further information. In some circumstances we may 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

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are explained in the Glossary. If you wish to exercise any of these rights, please contact us.

No fee usually required

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.

What we may need from you

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.

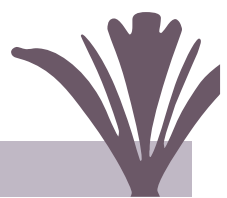
Time limit to respond

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 several 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.

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

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

THIRD PARTIES

Internal Third Parties

Other companies in the Company's group, acting as joint controllers or processors.

External Third Parties include:

- Service providers acting as processors who provide IT, system administration services and property maintenance services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, accountants/auditors, marketing advisers, human resources advisers and insurers who provide consultancy, banking, legal, marketing, human resources, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

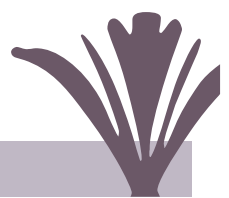
Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.



Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that 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.

Withdraw consent at any time where we are relying on consent to process your personal data. 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 certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

The Information we collate.

Personal information collected include:

Your name and date of birth

Postal and email address

Telephone contact details

Employment details

Other related information to support your requirements and confirm your identity (such as UK residency status)

We use an external company called Credas. Please see: www.credas.co.uk for more information.

Most personal information is collected by our directors and office manager when enquiring about a property sale / let and/or purchase or let, or from the enquiry form on our website. However, some personal information is obtained from website portals, www.zoopla.co.uk, www.copperviolet.co.uk, Credas and Vouch referencing company, then passed is passed to us with your consent.

Why do we collect your personal information?

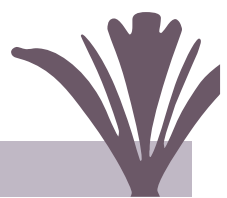
- To comply with Money Laundering Regulations as regulated by HM Revenue and Customs.
- To provide a full, comprehensive and professional service to all clients.
- To respond to complaints and case enquiries.

Your personal information is required to enter any contract you may undertake with us as your agent, and for us to provide information on relevant products and services. Without this information, it would not be possible for us to provide these services.

How do we use your personal information?

As your agent, we use your personal information to discuss your personal circumstances in order to determine the most appropriate solution for your needs.

Your personal information may be shared with contractors or agents, in order to maintain the customer relationship by providing continuing service as your estate agent and/or lettings agent and to inform you about relevant products and services.



Who we disclose personal information to:

It may be necessary to share your personal information with non-affiliated companies who perform support services on our behalf including those that provide professional or legal advice to Copper Violet. This may be with verbal consent and or as well as written consent.

These companies are required to ensure appropriate security measures are in place and maintain the confidentiality of your information, and to use your personal information only in the services as per Copper Violet Limited offers.

Under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations, for instance, to meet our obligations to the HM Revenue and Customs and when responding to subject access requests, proceedings of a court of law or similar legal process, to protect against fraud, and to otherwise cooperate with law enforcement or regulatory authorities.

The personal information you provide will not be passed to any third-party organisation for marketing purposes.

You will have the opportunity to indicate if you wish to receive communications from Copper Violet Limited about relevant services and products, together with other marketing communications when you provide your personal information.

Software and system providers including but not limited to:

SME Professional, Wix Internet Website providers.

Website Hosts and analytics platform providers including but not limited to:

Google Analytics, Wix Web Provider, SME Professional, Vouch, Zoopla, Credas.

If you subsequently want Copper Violet to stop using your personal information for these purposes, please contact our team at lettings@copperviolet.co.uk

How long is your personal information retained?

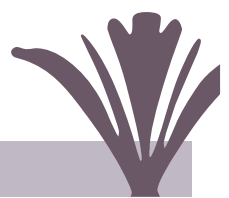
We will retain your personal information in accordance with applicable laws and while a client relationship is in place. HM Revenue and Customs requires data to be kept for 6 years from the date of the commencement of the business relations applicable laws and while a client relationship is in place. The Financial Conduct Authority (FCA) requires data to be kept for 6 years from the date of full application.

Accessing your personal information:

You have the right to access your personal information to check whether it is accurate and up-to-date. You also have the right to receive a copy of your personal information we process. You have the right to access your personal information to check whether it is accurate and up-to-date. You also have the right to receive a copy of your personal information we process.

Changes to our Privacy Notice:

We keep our Privacy Notice under regular review and we will place any updates on this website.





Questions:

If you have any questions or complaints relating to how we use your personal information, or if you wish to exercise any of your rights regarding your personal information, please contact:

Lettings@copperviolet.co.uk

or write to us at:

Copper Violet.
1 Midland Road,
Wellingborough,
Northamptonshire,
NN8 1HA

We will respond to you as soon as is possible. The length of time will depend on the type and complexity of the request, but you will receive a response no later than one month from the initial request.

What if I am still not satisfied?

If you are not satisfied with how Copper Violet has responded to your enquiry, you have the right to complain to the Information Commissioner's Office (ICO), who is the regulator for data protection in the United Kingdom.

T: 01933 277302

M: 07897 894397

ellie.flowers@copperviolet.co.uk

www.copperviolet.co.uk

