

# Privacy Policy

## Introduction

### Welcome to the Surrenden Invest's privacy notice.

Surrenden Invest Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This version was last updated on 22/02/2018

## 1. Important information and who we are

### Purpose of this privacy notice

This privacy notice aims to give you information on how Surrenden Invest Limited collects and processes your personal data through your use of this website, including any data you may provide through this website when you enquire about a property.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 notice supplements the other notices and is not intended to override them.

### Controller

Surrenden Invest Limited is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice). We are a company incorporated in England and Wales and our company registration number is 9527799.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

### Contact details

Our full details are:

Full name of legal entity: Surrenden Invest Limited

Email address: info@surrendeninvest.com

Postal address: Riverbank House, 1 Putney Bridge Approach, Fulham, London SW6 3JD

Telephone number: 0203 3726 499

Fax number: 0203 3707 836

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.

### Third-party links

This 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 follows:

- **Identity Data** includes first name, maiden name, last name, title, date of birth, nationality and passport details and gender.
- **Contact Data** includes email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about the location and price of the property or properties in which you are interested, whether you also require a furniture pack or packs and/or parking, the total purchase price, what mortgage you require, and what payments will be due from you and when.
- **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. 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.

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.

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.

### 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 details of the properties in which you are interested or to enter into a reservation agreement with you on behalf of the seller(s) of the property(ies). In this case, we may have to cancel your enquiry or reservation 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 by post, phone, email or otherwise. This includes personal data you provide when you make an enquiry about a property, enter into a reservation agreement, request marketing to be sent to you or give us some feedback.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties, such as Credit Safe and other search information providers, and publicly available sources such as Companies House and the Electoral Register.

## 4. Purposes for which 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, namely to provide you with information about a property or properties in which you are interested or to enter into a reservation agreement with you on behalf of the seller(s) of the property(ies).
- Where we need to comply with a legal or regulatory obligation to which we are subject, otherwise than under the contract we are about to enter into or have entered into with you, such as our contract with the seller(s) of the property(ies), our reporting obligations to H M Customs & Excise or our obligations under the Money Laundering Regulations.
- Where it is necessary for our legitimate interests (or those of a third party) in, for example, conducting and managing our business to enable us to give you and the seller(s) of the property(ies) the best service and the best and most secure experience, network security, preventing fraud and identifying potential bad or doubtful debts, and keeping our records updated or in the context of a business reorganisation or group restructuring. 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).

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party 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.

We may use your Identity, Contact, and Transaction Data to form a view on what properties may be of interest to you. You will receive marketing communications from us if you have requested information from us and have not opted out of receiving that marketing. You can ask us to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us in connection with a reservation agreement or other transaction you have already entered into with us.

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.

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.

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

## 5. Disclosures of your personal data

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

- The seller(s) of the property(ies) in which you are interested, and their professional advisers;
- Creditsafe, a global company which we use to carry out our anti-money laundering obligations.
- Other professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- External service providers who provide IT and system administration services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

We may also disclose your data to third parties to whom we may wish 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 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

We may need to transfer your personal data to sellers of properties, or their professional advisers, outside the European Economic Area (EEA), in order to perform the reservation agreement contract we are about to enter into or have entered into with you on their behalf. Subject to this, we do not transfer your personal data to countries outside 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

**For how long will you use my personal data?**

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, 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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Your Legal Rights 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.

If you wish to exercise any of the rights set out above, please contact us.

Specifically, 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 particular 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.

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.