

PRIME LONDON PRIVACY POLICY

This privacy policy covers the data you provide us or we have collected from you or about you. It explains why we collect your data and what we do with your data therefore please read this notice carefully.

Our services and website may include links to other independent websites and services not provided by us. As these sites and services are independent they are not under our control and as such we have no responsibility for content on these sites or services and have not approved or checked their privacy notices.

This privacy policy may be subject to change and this page will be updated accordingly.

For the purpose of the **Data Protection Act 1998** and **General Data Protection Regulation EU 2016/679**, the data controller is **Prime London Residential, SW1 Limited**, a company registered in England under company number **08469801** whose registered address is **Palace View, 131 Lambeth Road, London SE1 7JN**

What information do we collect from you or ask you to provide?

We typically ask you to provide the following personal details and information:

Your full name, address and other important contact details (fixed phone line number, mobile phone number, email address and postal address).

We are required by law to collect information relating to your identity to comply with the Immigration act and 2017 Money Laundering Regulations.

We are required to conduct conflicts of interests under regulatory obligations and will ask for information on your close connections.

If we are letting your property or renting through us we will need to set up an approved tenancy deposit account for you and arrange for rental payments. As such we will require your bank details.

In order to find a suitable property for you we will ask for information on any access requirements which may consist of special category personal data including details of disabilities or other relevant health information.

In order to send relevant marketing material and information about products and services that may be of interest to you we will require details about your area of interest.

We will collect information about visits to our website and usage (which enable our website to remember information about you and your preferences) and use of our site. Please read our 'Cookie Policy' for further details. This can include website visit information, including

- The full Uniform Resource Locators (URL),
- Clicks through from and to our site (including time and date)
- Products viewed by you or searched for
- Page response times
- Any download errors
- Length of visits to certain pages
- Page interaction information (such as scrolling, clicks, and mouse-overs)
- Methods used to browse away from the page and the phone number used to call our office
- Technical information, such as devices you use to connect to our app or website
- The device location data (unless this function has not been disabled by you on your device)
- The Internet protocol (IP) address of your computers connection to the Internet
- Your login information
- Time zone setting
- Browser versions and browser plug-in types and version
- Platform and operating system

Any communication between you and us including correspondence via telephone and email when you have contacted us with an enquiry on our service or product.

We may be required by law to collect your personal data (to meet our obligations to prevent money laundering and fraud for example) or under the terms of any contract we have with you. If you are unable to provide the data required when requested, we may be unable to perform or provide the contract or service that we have or are trying to enter into with you. In this case, we may have to cancel the product or service you have asked us to supply, but you will be notified if this is the case as soon as possible.

On what basis do we process the information we collect from you?

Under current data protection legislation we have legal grounds to process your personal data as follows:

In order to perform a contract for a product or service to which you are a party, or to undertake the necessary process before entering into a contract with you for that product or service.

We have your explicit consent to the processing of your personal data for one or more specific purposes, namely Electronic Marketing by us where you have given us consent and/or to process your Special Category Personal Data described above. You can still receive our services without providing marketing consent.

It is a necessary requirement as part of our legitimate business interests, unless our interests are overridden by the interests, rights or freedoms of individuals affected (such as you). A number of factors are considered to determine this, such as our correspondence and conversations at the time you provided the data, your expectations from the processing of the data, the type and nature of the data, and the impact of us processing your data. Our legitimate interests include processing your data to promote and improve product and services provided by us and to develop a better understanding of our customers' interests and our knowledge of the market in which we operate and for the day to day administration and the technical aspects of our service and products.

In rare circumstances and to comply with legal obligations.

In order to protect your interests or the interests of a 3rd party; and/or where it is required for official purposes or is in the public interest.

Why is your information required and how will we use it?

Your personal information will be held and used in the following ways:

To provide you with our products and services for which we are obligated.

We may be required to share your information with others to provide a product or service for which we are obligated to you or where acting as agent for a third party on your behalf.

As part of our regulatory and statutory obligations, including identity verification, prevention of money laundering and fraud and for the assessment of your credit worthiness.

We may communicate and have contact with you during the course of providing our product and services, for example dealing with your requests and enquiries.

Your data may provide statistics that can be analysed to plan for future products and services and help manage our business.

Where we have your permission to do so or if you are an existing customer your data will be used to provide you, or to enable third parties to provide you with information about goods or services we believe may be of interest or relevant to you. Where we choose to contact you by electronic means (including e-mail or SMS) with information about our own goods and services similar to those which you have already obtained from us or negotiated to obtain from us. You can unsubscribe from marketing messages at any time.

Your usage of our website, app and other online services will be tracked and maybe used to improve these services.

You may be notified of changes to our products or services

Your data will be used to ensure our website, app and other online services are presented to you in the relevant format for your device or computer.

How long is your data stored with us?

Your personal data will be retained for different periods depending on the product or service we provide you. This may be a longer period than that for which we need to hold your data to provide those services, i.e. where we are under regulatory or statutory duties to hold your data for a longer period or need to retain it in the event of a legal claim or complaint.

Who do we share your personal information with?

As part of our daily business activity we may pass your data to service providers in order for us to deliver the services you expect from us. These include but are not limited to other companies providing you a service linked to our own, cloud computing host providers and technical support service providers.

We will also pass your details where necessary to your legal services and possibly the legal services of other parties to your transaction. We may also disclose your personal information to third parties:

If there is a legal duty or regulatory obligation with which we must comply or to protect the rights, property, or safety of our company, our customers, or others we will disclose or share your personal data. This includes exchanging information with other companies and organisations for the purposes of credit risk reduction and fraud protection.

Prior consent will be obtained from you before we share your information with third parties for marketing related purposes.

Data and information security

Your data will be held on secure servers which may or may not be located in the EEA (European Economic Area). All reasonable operational and technological measures have been put in place to safeguard your data, our content and our systems from any unauthorised access. Wherever possible any identifiable information will be secured, encrypted or minimised.

Parts of our system may be accessible by our customers and users. This access will be password protected. If you have been given a username and password which enables you to access certain parts of your data on our systems it is your responsibility to keep it confidential. Under no circumstances should you disclose or share it with anyone.

User rights

Accessing and updating your information.

It is your right to request a copy of the personal data and information we hold about you. This is known as a data subject access request. It is also your right to request that information we hold about you which may be incorrect, or which may have changed since you first told us, is updated or removed. There is no charge for this service. Please send requests to our Data Protection Officer: Joseph T.M. Cadman, Prime London, Palace View, 131 Lambeth Road, London SE1 7JN

Deletion of your information and data

It is your right to ask us to delete or remove personal data where there is no good reason for us continuing to store and process it. It is your right to ask us to delete or remove your personal information and data where you have successfully exercised your right to object to processing (see below), where we no longer have your consent for us to process it (as explained below), where we may have processed your information unlawfully or where we are required to delete your personal information and data to comply with local law.

Note, however, that it is not always possible to comply with your data and information deletion request for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Withdrawing your consent

It is your right at any time to withdraw any consent you have given us to process your personal information and data. Please note if you withdraw your consent it will not affect the lawfulness of any processing of your personal data we have carried out before you withdrew your consent. Your consent preferences can be changed at any time by contacting us.

Restricting or objecting to our use of your data and information

It is your right to ask us to suspend the use of your data and information in certain scenarios, or object to our processing your information and data where we are relying on a legitimate interest ground (or those of a third party) and you believe it impacts on your fundamental freedoms and rights, or where your data and information is being processed for direct marketing purposes. Each case will be investigated and in some cases where you object, we may demonstrate that we have compelling legitimate grounds to process your data and information which override your freedoms and rights.

Often your data is essential to the supply and delivery of a service provided by us to you. Please note that if you want us to restrict or stop processing your data and information this may impact on

our ability to provide that product or service. Depending on the extent of your request we may be unable to continue providing you with our service.

Questions, concerns or any other enquiry relating to the way we process and use your data and information is being used can be sent to our Data Protection Officer: Joseph T.M. Cadman, Prime London, Palace View, 131 Lambeth Road, London SE1 7JN.

The moving of your data and information to another organisation

If your data and information is processed by automated means where consent for us to use your data and information has been provided by you or where we used the information to perform a contract with you, it is your right to request that a copy of your personal data and information be sent to you or to another organisation, for example when you are dealing with a different service provider. These requests are free of charge. If you would like us to move, copy, or transfer your data and information please let us know by email to office@primelondonresidential.com. We will respond to you within one month after assessing whether this is possible, taking into account the technical compatibility with the other organisation in question.

Complaints about the use of your personal data and information

Complaints regarding the use of your personal data and information will be investigated. If you wish to raise a complaint on how we have handled your personal data and information, you can contact us to have the matter investigated by writing to our Data Protection Officer: Joseph T.M. Cadman, Prime London, Palace View, 131 Lambeth Road, London SE1 7JN.

If you believe we are not handling or processing your personal data and information in accordance with the law or if you are not satisfied with our response to a data information complaint or request you can complain to the UK data protection regulator, the Information Commissioner's Office. Further details can be found at www.ico.org.uk or 0303 123 1113.