

## PRIVACY POLICY

Prestige Property Management's Privacy Policy provides information on how we collect, use, secure, transfer and share your information.

Prestige P M Ltd is a Letting Agent based at 39 Victoria Street, Morecambe, Lancashire, LA4 4AF, UK.

Company Number: 4492544 registered in England. Registered Office: N.M.B.C. Woodward Road, Knowsley Industrial Park, Merseyside, L33 7UY.

The company provides a service to buyers, sellers, landlords and tenants.

### 1. Types of Information Collected

Typically Prestige collect:

First Name	Middle Name	Surname	Previous Name
Date of Birth	Present Address	Previous Addresses	Residential Status
Email Addresses	Phone Numbers	Present Landlord Name & Address	Present Landlord Phone number
Marital Status	Gender	NI Number	Nationality
UK National	How many Dependants	Dependents Name	Dependants DOB
Employers Name & Address	Employers Phone Number	Previous Employers Name & Address	Previous Employers Phone number
Bank Details	Accountant Details	Estate Agent Details	Solicitor Details
Mortgage Details	Insurance Details	Criminal offences/Convictions	Personal Debt Details/Adverse Credit History
Reasons for moving	Personal Loan Details	Personal Expenditure	Mortgage Details
Health	Ethnicity	Credit Card details	Salary
Cookies	IP address	* Primary ID	* Address ID
*Bank Statements	* Credit Card Statements	* Payslips	* Self Employed Accounts
* Utility bill	* Passport	*Driving Licence	* Mortgage Statements

\* copies of

### 2. Method of Collection

In the general conduct of business, Prestige Property Management collects information relevant to the services being sought across the services it offers from:

- Yourself
- Next of Kin
- Spouse / partner / family member
- Business Associates
- Guarantors

- Accountant
- Employers
- Insurance Companies
- Trusted sources including:
  - Government / Land / Police Registers
  - Credit / Default Agencies
  - Financial Institutes (Banks, Building Societies)
- Law Firms
- Through consent to third parties disclosing information about you to us that they have collected.

Such information will generally be collected directly via the use of any of our standard forms, over the internet, via email, via our website, in our branch or through a telephone conversation with you. We may also collect personal information through third parties such as property portals, for example Rightmove or Zoopla.

We collect certain information by using automated means, such as cookies (see below) when you interact with our advertisements, mobile applications, or visit our website pages or other digital assets. The information we collect in this manner may include: IP address, browser type and version, geographical location, referral source, length of visit, page views, website navigation.

We may use third-party web analytics services on our websites and mobile apps. The analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our websites and apps.

“Your Rights and Choices” section of this Privacy Notice specifies your ability to opt out or limit the usage of the information collected.

### 3. Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

### 4. Purposes of collection

Generally, we will collect, use and hold your information for the purposes of:

- Conducting residency checks in accordance with the Immigration Act 2014.
- Undertaking transactions carried out between you and us relating to you as a seller, buyer, landlord or tenant and in assessing applications for Prestige Property Management’s products and services.
- Conducting business, developing relationships with Prestige Property Management.
- Process payments and transactions including Accounting, Authorisation, Auditing, Billing, Reconciliation, Collection, Complaints, Enquiries, Credit Checks and related dispute resolution activities.

- Protect against and prevent fraud, unauthorised transactions, money laundering (please see separate policy), tax evasion, claims, other liabilities and manage risk exposure and quality, integrity, compliance and security of business processes.
- Provide, administer and communicate with you about Prestige Property Management products, services and offers.
- Operate, monitor, evaluate and improve our products, services, website, mobile applications, other digital assets and business for:
  - Developing new products and services.
  - Managing communications, assess effectiveness and optimisation of advertising.
  - Functionality of our website, mobile applications and other digital assets.
  - Evaluate your interest in employment and contact you regarding possible employment opportunities.
  - Enforce legal rights as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over Prestige Property Management.
  - Comply with industry standards and Prestige Property Management policies.
  - Enable your use of the services available on the website.
  - Send you email notifications which you have specifically requested.
  - Send to you marketing communications relating to our business which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications).
  - Deal with enquiries and complaints relating to the website.

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

## 5. The Lawful Basis of Processing Information

Prestige Property Management processes your information under the following:

- Performance of a contract: where you enter into a contract with Prestige Property Management and we need to process your information as part of this contract.
- Legitimate interests: some information is processed by Prestige Property Management as part of its legitimate interests which include: fraud, risk assessment, due diligence, network and information security, managing opting out of communications, profiling, direct marketing, monitoring, web analytics, cloud storage, updating customer details, lettings, sales, financial services and other core products and service provided by us.
- Consent: where we process information under consent we will seek your clear and unambiguous consent prior to processing your data.

## 6. Information we share

We do not sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- Employees, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes as set out in this privacy policy.
- Solicitors, surveyors, subcontractors and related parties during the process of a property sale.
- A purchaser (or prospective purchaser) of any business or asset that we sell.
- Financial institutions for business facilitation to provide required services, such as mortgages etc.
- Formally contracted service providers to perform services on our behalf:
  - Hosting Data Centres, Cloud Services
  - Preparation of properties for sale or rent: EPC's and Inventories companies
  - Credit and reference agencies, Land Registry Office, Her Majesty's Revenue and Customs (HMRC), Financial Conduct Authority (FCA) and other relevant regulatory bodies
  - Additionally, we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities.
  - Perspective employers requesting references via your written consent.

We contractually require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements.

On websites, features can be accessed where we partner with other entities that are not affiliated with Prestige Property Management. These include social networking, geo-location tools etc and are operated by third parties (indicated appropriately) who may use or share personal information in accordance with their own privacy policies. It is recommended that you review the third parties' privacy policies if you use the relevant features.

## 7. How We Protect Personal Information

The security of your personal information is very important to Prestige Property Management. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. We use secure password and firewall protected servers and encrypted computers.

Prestige Property Management stores personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information was collected, unless otherwise required or authorised by applicable law.

We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

#### 8. How Long Do We Keep Information For

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep your information for as long as necessary. We generally keep personal information for seven years after last contact with you. However, Prestige Property Management reserves the right to keep information for longer if we feel that this is in the legitimate interests of Prestige Property Management.

#### 9. Your rights and Choices

Your rights regarding the sensitive / personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information, and how we communicate with you.

#### 10. Access and Correction

You may instruct us to provide you with any personal information we hold about you.

You have the right to:

- Obtain confirmation that we hold personal information about you.
- Receive copies of the personal information we maintain about you.

The right to access personal information may be limited in some circumstances by local law requirements.

To exercise these rights, please contact us as outlined below.

#### 11. Update and Correct Inaccuracies in Your Personal Information

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate.

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint.

#### 12. Object to The Processing of Your Personal Information

If you would like to object to any processing of your information by Prestige Property Management you can contact us outlining what processing of information you would like to object to.

### 13. Have The Information Blocked, Anonymised or Deleted

If you would like Prestige Property Management to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like deleted, blocked or anonymised.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us as specified in the “How To Contact Us” section below. You can at any time tell us not to send you marketing communications by:

### 14. Opting Out of Processing

You can at any time tell us not to send you marketing communications by:

- e-mail: [anne@prestigepropertymanagement.co.uk](mailto:anne@prestigepropertymanagement.co.uk) or
- contacting Prestige Property Management as indicated below.

### 15. Withdrawal of Consent

If we obtain your information by consent you have the right to withdraw any consent you previously provided to us.

If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information.

Prestige Property Management will apply your preferences going forward. However, doing so will mean that you cannot take advantage of certain services and offers.

The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.

### 16. How to Contact Us / Complaints and Feedback

If you:

- Make a complaint about a breach of your personal information, applicable privacy laws / principles or a concern about Prestige Property Management privacy practices.
- Would like access and/or update information or preferences you provided to us.

You may e-mail us at: [anne@prestigepropertymanagement.co.uk](mailto:anne@prestigepropertymanagement.co.uk) Or write to us at:

Anne Nicholson  
Company Secretary  
Prestige Property Management  
39 Victoria Street  
Morecambe  
Lancashire, LA4 4AF.

To assist us in responding to your request, please give full details of the issue. We will attempt to review and respond to all complaints within a reasonable time.

If we cannot for lawful reasons complete your request we will explain this to you to the extent that we lawfully can.

#### 17. Updating This Privacy Statement

We will update this statement from time to time so we suggest that you review this statement at regular intervals. Where we undergo substantial changes to our privacy statement we will endeavour to inform you directly about these changes.

Updated May 2018