

# Exceptional Property Ltd

## Privacy Policy

### **Our contact details**

Name: Ayshea Boadu

Address: Registered Office 15 Bramley House, 2a Bramley Road, Long Eaton, Nottinghamshire, NG10 3SX

Phone Number: +44 7506 153058

E-mail: [admin@exceptionalproperty.org](mailto:admin@exceptionalproperty.org)

### **The type of personal information we collect**

We currently collect and process the following information:

Identity Data

Contact Data

Client's Interest in our services

## **How we get your personal information and why we collect it**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To identify and verify clients Identity
- To identify and source services and products suitable for client's needs

We use the information that you have given us in order to identify which products and services will be most suitable and to respond to your queries and/or expressed interest.

We may share this information with Lloyds Bank to set up and protect your funds with a client account and any Government backed organisations in line with Anti-Money Laundering. Estate Agents or Property Developers who have products and/or deals that fit your agreed criteria.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

**(a) Your consent. You are able to remove your consent at any time. You can do this by contacting: [admin@exceptionalproperty.org](mailto:admin@exceptionalproperty.org)**

**(b) We have a contractual obligation.**

**(c) We have a legal obligation.**

**(d) We have a vital interest.**

**(e) We need it to perform a public task.**

**(f) We have a legitimate interest.**

### **How is your personal data collected?**

Direct Contact by phone, text or WhatsApp

Automated technologies or interactions with our website, by using the web enquiry form or social media

Third parties or publicly available sources

### **Lawful basis for how we use your personal data we collect from you**

We will collect information from you in relations to the services provided and rely on the following lawful basis for processing:

#### **Consent**

We shall always seek your consent to process certain types of information where we are legally required to do so. We use consent to initially engage with you and may communicate through phone, email SMS & webchat. We request consent to provide you

with an ongoing service and contact you in the future to keep you informed of other products and services from Exceptional Property that may be of interest to you.

### **Legitimate Interest**

- **Legitimate Interest** In order to deliver the direct marketing described above, Exceptional Property may provide individuals' personal contact details to mailing and fulfilment houses and telephone agencies, supplied from our own secure database.
- **Contract & legitimate interest** To manage our relationship with you and inform you of changes to our products and services and re-engage with you to review your needs.
- **Legal obligation & legitimate interest** To handle enquiries, complaints, and your requests to exercise your rights.
- **Legitimate Interests** We may process your personal data for the purposes of our own legitimate interests or for the legitimate interests of our suppliers provided that such processing does not outweigh your interests. For example:
  - To comply with our legal obligations.
  - Develop and improve our products and services, including for the purpose of quality control and analysis.
  - Deliver relevant website and advertisement content to you.
  - Administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
  - Measure or understand the effectiveness of the advertising we serve to you.
  - Use data analytics to improve our website, products/services, marketing, customer relationships and experiences.

4. You may advise us at any time should you no longer wish us to use your data

5. Third parties who we collect information from or share information with

- **External suppliers** such as Stripe [[www.stripe.com](http://www.stripe.com)] which we use to process payments.
- **Legal obligations**, to co-operate with law enforcement, legal proceedings, or regulatory authorities.
- **Changes of ownership** if we sell, transfer or merge parts of our business or our assets any personal data supplied by you where relevant to that part of the business will be transferred to the new owner or controlling party and will

continue to be used under the terms of this policy for the purposes that the personal data was originally supplied to us.

- **Software systems** we use third party software systems including cloud-based storage, All software suppliers store any data in the UK and are subject to UK regulations including the UK Data Protection Regulations and are obliged to keep your details securely and use them only to fulfil the contracted service.

6. Please note that the sharing of your Information does not entitle such third parties to send you marketing or promotional messages.

It is shared for the purpose of ensuring we can adequately fulfil our responsibilities to you. We recommend you also read their Privacy Notice in conjunction with ours which can be found on their own websites.

7. How long will we keep your information for?

We only retain your personal data for as long as is necessary and depends on the purpose for which we use it, our obligations, and your actions. We will retain and process your personal information based on our statutory and legal obligations, our regulatory requirements, and our legitimate business interests.

We may continue to use anonymised data (which does not identify individual users) for data analysis, profiling, and research purposes, for example to gain insights about our users.

8. Data Security

Your privacy is important to us. We store this on secure servers so that it can only be viewed by authorised personnel. We do our best to protect your personal data, but we cannot guarantee the security of your data you transmit to us, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access, loss, or damage. We only process your information within the UK. 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.

9. Your rights in relation to your information

- **Request access to your personal data** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. You have the right to request copies of all records we hold about you.
- **Request correction of the personal data** This enables you to have any incomplete or inaccurate data 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 personal data where there is no reason for us continuing to process it or where you have successfully objected to the processing, where we may have processed

your information unlawfully or where we are required to erase your personal data to comply with local law. Please note that we may not always be able to delete the data for specific legal reasons, if applicable we will notify you, 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 overrides 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.
- **Right to complain** to the Information Commissioners Office If you are not satisfied with how we respond to your enquiry, you have the right to complain to the ICO, who is the regulator for data protection in the UK. <https://ico.org.uk/make-a-complaint/>

## 10. Website & Website Links

We use services such as Google Analytics to track how visitors use our website, to understand trends and how the business works and so that we can improve the user experience. The reports we produce do not identify individuals.

Should you wish to complete a contact or enquiry form on the website or through our connected portals, we collect and store the personal information supplied to us via secure servers to enable us to fulfil your request. Any personal information you chose to

disclose via the website or portals will be processed in accordance with this privacy notice.

Our website may include links to third-party websites, plug-ins, and applications. If you follow a link to or from our app to a third-party website, you 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 and we do not accept any responsibility or liability for these policies.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 11. Cookie Policy

When using our websites, 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 the websites may become inaccessible or not function properly. For further information about the cookies we use, please see our cookie policy.

## 12. Marketing

You have the choice to opt-in to receive general news and updates and information on products and services offered by us.

We will obtain explicit consent from you either verbally, via our website, by email, or by completion of a consent form and will keep a record of your consent.

Marketing may include emails, SMS, telephone calls and postal marketing. You can advise us of your preferences on how you would like us to provide marketing.

We will not provide your personal data to any unconnected third party in connection with marketing.

You may update your preferences or withdraw your consent at any time by emailing the Compliance Team: [admin@exceptionalproperty.org](mailto:admin@exceptionalproperty.org) clicking on the relevant link in email communications you receive from us.

We will never sell your information to third parties.

## 13. How to contact us

If you have any questions or complaints relating to how we use your personal data, or if you wish to exercise any of your rights please contact the Compliance Team, Exceptional Property 15 Bramley House, 2a Bramley Road, Long Eaton, Nottinghamshire, NG10 3SX

14. We shall reply as soon as possible and depending on the complexity of the request aim to fulfil your request no later than one month from receiving it. If we need additional time, we will tell you and give you the reasons why.

## 15. Changes to our Privacy Policy

It may be necessary to update this privacy policy to meet legal, regulatory, and commercial requirements. Please visit this page from time to time and take note of any changes. Any personal data collected prior to any change will not be affected by the change without your permission.

## **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at: [admin@exceptionalproperty.org](mailto:admin@exceptionalproperty.org), Postal Address: Exceptional Property, Registered Office 15 Bramley House, 2a Bramley Road, Long Eaton, Nottinghamshire, NG10 3SX, Phone: +44 7506 if you wish to make a request.

## How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at: [admin@exceptionalproperty.org](mailto:admin@exceptionalproperty.org)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>