

## **LETTING CENTRE (CARLISLE) LTD: PRIVACY POLICY**

### **INTRODUCTION**

Welcome to The Letting Centre (Carlisle) Limited (“LCC”) privacy notice.

LCC 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, to include 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.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

#### **1.1 Purpose of this Privacy Notice**

This privacy notice aims to give you information on how LCC collects and processes your personal data, including any data you may provide through on our website.

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 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 any other notices and is not intended to override them.

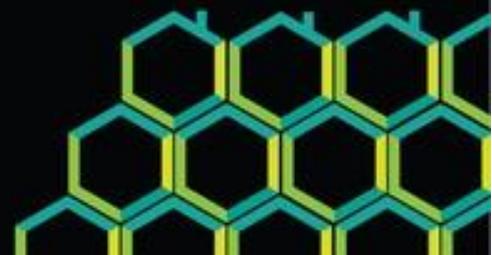
#### **1.2 Controller**

LCC is the controller and responsible for your personal data (collectively referred to as “LCC”, “we”, “us” or “our” in this privacy notice).

We have appointed a Data Protection Officer (“DPO”) 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 DPO using the details set out below.

#### **1.3 Contact Details**

Our full details are:



The Letting Centre (Carlisle) Limited  
DPO: Mr Adrian Mason  
Address: 55 / 57, Warwick Road, Carlisle CA1 1EE, UK  
Email: [hello@lettingcentrecarlisle.co.uk](mailto:hello@lettingcentrecarlisle.co.uk)  
Telephone: 01228 819333

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.

#### **1.4 Changed to the Privacy Notice and your duty to inform us of changes**

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.

#### **1.5 Third-Party Links**

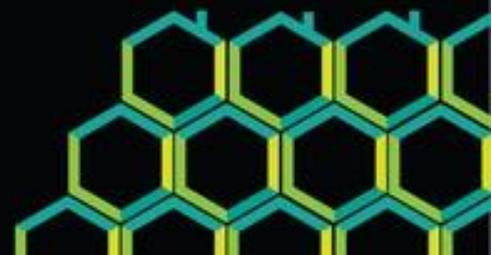
Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you 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 the following personal data about you:

- The personal details you provide (such as name, address, e-mail address, marital status, title, date of birth, gender, business or personal address, phone number) when working with LCC.
- Bank details and payment details that we require for the purpose of processing any payments for work completed by LCC on your instruction.
- Personal details you choose to give when corresponding with us by phone, email, online job application or that you provide to us when you visit LCC.
- Legal information and other personal information provided by you and third parties to include HMRC and the Land Registry.
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- Any other personal or private information about you that you choose to submit to us to include via our website or any other websites we operate.

We 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 website feature. 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.

### **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 services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

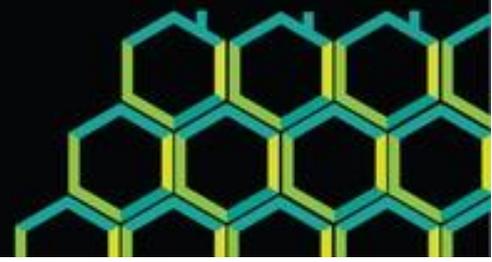
### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

**3.1 Direct interactions.** You may give us your personal 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 services;
- contract to our service
- feedback.

**3.2 Automated technologies or interactions.** As you interact with our website, Facebook site, twitter site and Instagram site, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.



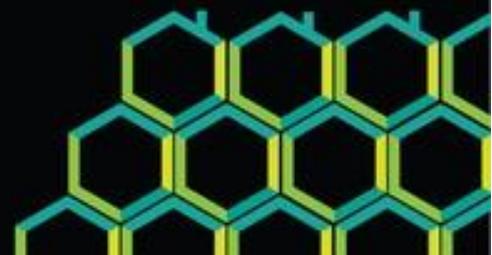
**3.3 Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- analytics providers such as Google and Facebook based outside the EU;
- advertising networks such as Facebook etc. based inside **OR** outside the EU; and
- search information providers based inside **OR** outside the EU; and
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside **OR** outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Land Registry.

#### **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:

- To operate our business and provide you with services you have requested.
- To display the content of this Site, and any customisations you may select.
- To verify your identity.
- To acknowledge, confirm and deal with your enquiry, job application, brief or order.
- Where we are asked to deal with any other enquiries or complaints you may make.
- To notify you about any changes to our Sites, or services provided through our Sites
- To provide you, with information about our services. Any marketing email that you receive from us will allow you to unsubscribe to further email promotions.
- To contact you in connection with customer surveys and use any information you choose to submit in response.
- To administer our Site and ensure that our Site is presented in the most effective manner for you and your computer/device.
- For internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and as part of our efforts to keep our Site secure.
- On an aggregate basis, to understand how individuals collectively use the features of our Site.
- To give effect to your legal rights and your rights under this Privacy Policy.
- To protect against fraud, identity theft, and other unlawful activity.
- To establish or exercise any legal rights or claims.
- To satisfy our obligations under applicable law, this Privacy Policy, and any other policies or terms that are applicable to our relationship with you.
- For other purposes to which you have consented, and we may combine personal data that you provided to us with other information we collect about you for the purposes set out in this Privacy Policy.



Generally we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent at any time by contacting us.

## **5. DISCLOSURE OF YOUR PERSONAL DATA**

We may share your personal data with third parties in the following situations:

- We may disclose your personal data to our employees and agents to the extent necessary to provide you with the services you have requested.
- We may make your personal data available to selected third parties who act on our behalf to support our operations (for example payment services and reference agencies).
- Our IT suppliers, marketing companies and contractors (e.g. data hosting providers or delivery partners) who may need to have access to your personal data to provide IT support and enable us to provide products and services, subject to appropriate contractual protections in accordance with applicable law.
- To protect us or contractors against loss or damage (including without limitation, exchanging information with the police, courts or law enforcement organisations).
- To the extent necessary to establish, exercise or defend legal rights or claims, or for the purposes of investigating actual or suspected unlawful activity.
- 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.

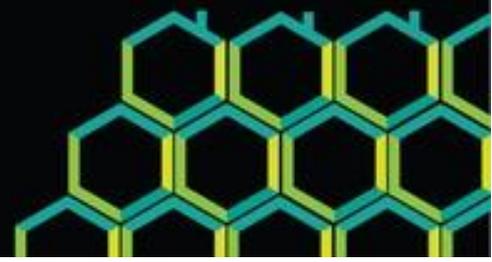
We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance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

## **6. COOKIES**

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 this website may become inaccessible or not function properly.

## **7. 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.

## **8. 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. We take the security of our clients' data very seriously and we use appropriate measures to protect all personal information collected in a secure, controlled environment consistent with GDPR legislation. The personal data that we collect from you is stored on UK based servers. Unfortunately, the transmission of information over the internet or public communications networks can never be completely secure. When you submit your personal information through our websites this is at your own risk.

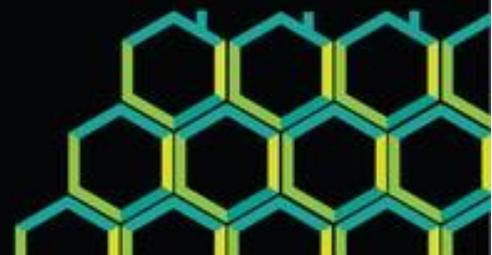
In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

## **9. DATA RETENTION**

### **9.1 How long will you use my personal data for?**

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.

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.

## **10. YOUR LEGAL RIGHTS**

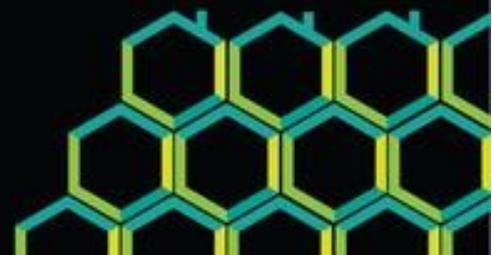
Subject to applicable law, you may have the following rights in relation to your personal data:

- 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.
- The right to lodge a complaint with a supervisory authority (The Information Commissioner's Office)
- 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 right to request access to, or copies of, your personal data that we process
- The right to request correction of any inaccuracies in your personal data.
- The right to object, on legitimate grounds, to the processing of your personal data
- The right to request that your personal data are deleted. This does not affect your statutory rights. If you wish to exercise any of these rights please contact us as described in the section below headed 'Contact'. We may also need to ask you for further information to verify your identity before we can respond to any request.

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

### **10.1 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.



## 10.2 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.

## 10.3. Time Limit to respond

We try to respond to all legitimate requests within 30 days. Occasionally it may take us longer than 30 days 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.

## 11. CHANGE TO PRIVATE POLICY

If we change this Privacy Policy, we will let you know about the changes by publishing the updated version on our website: <http://www.lettingcentrecarlisle.co.uk>

We are committed to protecting and respecting your privacy and will continue to do so in any future changes we make to this Privacy Policy.

## 12. 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 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.