

Introduction

Welcome to the Property People's privacy notice.

Property People respect your privacy and are 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.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Property People collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a ticket or take part in a contest.

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

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

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: Property People Ltd

Email address: advice@propertypeopleni.com

Postal address: 27A Main Street, Augher, Co. Tyrone, BT77 0BD

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

We keep our privacy policy under regular review. If we change our privacy policy we will post the changes on this page, and place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times.

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.

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, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, previous address, work address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details and possibly your salary/ financial income (for application processing or proof of funds for the purchase of a property. Property People does not store your payment information other than the last four digits of your credit card or bank account (as applicable), expiration date and country.
- **Employment Data** includes your employers name, their contact information and the duration of your employment

- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Communications you send to us** for example when you report a repair or send us questions or comments or report a problem.
- **Criminal Convictions/offences** as part of our application process we will ask you to disclose any criminal convictions of offences you have committed.

We partner with other companies (such as Stripe) for payment processing and the payment information you submit is collected and used by them in accordance with their privacy policies.

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).

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 goods or services). In this case, an application you have made 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:

- **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 or service;
 - submit an application for a property;
 - enter a bid for a property
 - request a viewing
 - request marketing to be sent to you;
 - enter a contest, promotion or survey; or
 - give us some feedback.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Contact Data from the following parties:
 - (a) advertising networks such as Google and Facebook; and PropertyPal
 - (b) search information providers such as Google.
 - (c) government agencies such as NIHE.
 - Contact, Financial and Transaction Data from providers of technical and payment services.
 - Identity and Contact Data from publicly available sources.

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 keep your account secure and protect our Services (including to verify the identities of creators and prevent fraud and abuse);
- To enable us to provide you with our Services, and to improve and promote our Services;
- To create and administer your account, contact you, and fulfil our contractual obligations under any lease agreements which may be held.
- To track and analyse use of the services so that we can improve how Property People is performing and provide tenants and customers with the best experience possible.

Purposes for which we will use your personal data

Data protection law requires us to have a lawful ground for collecting and retaining personal data. The lawful bases on which we will process your data are:

- Performing the contract we have with you: In certain circumstances, we need your personal data to comply with our contractual obligation to deliver the services as well processing applications and carrying out security or background checks.
- Legal compliance: Sometimes the law says we need to collect and use your data. For example, tax laws require us to retain records of payments made through our services.
- Legitimate interests: This is a technical term in data protection law which essentially means we have a good and fair reason to use your data and we do so in ways which do not hurt your interests and rights. We sometimes require your data to pursue our legitimate interests in a way that might reasonably be expected as part of running our business and that does not materially impact your rights, freedom or interests.

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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or applied for a property with us or if you provided us with your details when you entered a contest or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company

outside Property People for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us via email, phone or post or by following the opt-out links on any marketing message sent to you or 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 as a result of an application or enquiry you made.

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.

5. Disclosures of your personal data

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

- Our Event Partners. We may share any of your information with our Event Partners so that they can run the event for which tickets have been purchased, where necessary to fulfil the order, analyse customer behaviour, provide a better service and support to customers, and for any other purpose described in our Event Partners' privacy policies (including marketing). You should read those policies to learn how they treat your information.
- Contest or Rewards Partners – if you take part in a contest provided by another company, we may receive and/or share your personal information with that company.

Selected third parties - if you consented to be contacted by email or other means by selected third parties, we may provide your information to the third parties we select, and these third parties may use this information for their marketing or advertising purposes. Our third party service providers - we may share your information with third parties so that they can provide services to us (e.g. an ISP so that install broadband services in your property), but where applicable will put in place a written agreement protecting your information.

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 do not transfer your personal data outside the European Economic Area (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

How long will you use my personal data for?

Property People will process personal data during the duration of any contract or lease agreement and will continue to store only the personal data needed for six years after the contract has expired to meet any legal obligations. After six years any personal data not needed will be deleted.

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.

9. Your legal rights

If you wish to withdraw any consent you have provided to us for such use of your personal information, please contact us or tell us about your preferences using the methods described in this section.

- You can opt out of receiving marketing communications including newsletters you can contact us via email on: advice@propertypeopleni.com, by phone on 02890747300 or by post to: 27A Main Street, Augher, Co. Tyrone, BT77 0BD.

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.

What we may need from you

We may need to request specific information from you to help us confirm your identity, process an application 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.

Time limit to respond

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.

YOUR LEGAL RIGHTS

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.