

#### Cotswold House Hunter Limited Privacy Notice

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#### 1. Information covered by this notice

This Privacy Notice applies to the use and processing of personal data collected and used by Cotswold House Hunter Limited across its website and other media it may own and operate as well as personal information collected manually. "Personal data" is information relating to you as a living, identifiable individual. The phrases used in this notice, "we", "us" and "our" refer to Cotswold House Hunter Limited who act as the Data Controller.

This Privacy Notice explains how we use the information we collect about you, how you can instruct us if you prefer to limit the use of that information and procedures that we have in place to safeguard your privacy.

By using our website and otherwise providing your personal information to us, you agree to the collection, use and sharing of your information in accordance with this statement.

# 2. Personal information we collect

We gather information directly from you when you choose to contact us via phone or email or enter your details via our website or participate in offers and incentive programmes. In this instance we may collect these data:



- Name
- Email address
- Postal address
- Telephone and/or fax number
- Date of birth
- Demographic information
- Payment information (such as a credit card) and bank account details
- Date of birth
- Future communication preferences
- Telephone number and recordings when you call our customer service line

We may also collect data about you from face to face meetings or over the phone.

Other instances when we collect data.

We use cookies and other tracking technologies and may collect data when you visit our website or view our digital advertisements and promotions or other promotional services. This is the sort of date we may collect:

- IP address
- Web pages your view
- Links you click
- Emails you open from us
- Information about your device and operating system

We may also collect information about you from other sources such as social media platforms or referral agents, or publicly available sources such as Land Registry. And there may be instances when we collect information about you where you have made it publicly available such as in videos, blogs, internet articles and 'user-generated'.

#### 3. Why do we process your personal information?

We will only collect and use your personal information (as described in sections 2 and 3) in accordance with data protection laws. Our grounds for processing your personal information are as follows:

Consent – Where necessary we will only collect and process your personal information if you have consented for us to do so. For example, when you request for us to email you our Market Comment newsletter.



Legitimate Interests – We may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of "legitimate interests" as a justification for processing your personal information.

Our legitimate interests for processing your personal information are:

3.1 in processing your personal data to measure and improve the performance of our websites in order to provide you with the best possible visitor experience. We will ensure your personal data is appropriately protected from misuse, by using technical measures, policies and procedures;

3.2 in the case of sales enquiries and with our clients, in establishing and maintaining a two-way enduring and mutually beneficial relationship with you. We also have a legitimate interest in the case of processing your data for marketing purposes, in marketing our services which are, or may be, of interest to you.

3.3 in the case of compliance with our legal and professional obligations to third parties. For example, to protect you against possible fraudulent transactions or in accordance with our legal obligation placed on us under law (or for example reporting data breaches to the Information Commissioner).

Contractual – We will process your personal information in order to fulfil contractual obligations to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

You have a right to object to our use of your personal information for these legitimate interests, including a right to object to profiling by us (see section 8 below).

# 4. Use of children's personal information

We do not knowingly collect or store any personal information about children under the age of 16. If you are aged under 16 please get your parent or guardian's permission before you provide any personal information to us.



#### 5. Sharing your personal data

We will not share your personal data with any third party unless you consent to such sharing, or as described within this statement.

# 6. Disclosure of your personal information to other organisation

The personal information that we collect when you use our website is confidential. We may disclose your personal information to a third party in the following circumstances:

- If this business is sold or merged with another business your personal data may be disclosed to our advisers and any prospective business purchaser and their advisers and will be passed on to the new owners of the business.
- Should we be instructed by you to pass your details to another property agent
- To protect, defend or exercise the rights and property of Cotswold House Hunter Limited (including enforcing our Terms and Conditions).
- As required by law and/or government authorities.

For the purposes of providing certain services and enabling your interaction with the website and to access our services. These include:

Disclosure of personal data in fulfilment of contractual obligations to the Client.

Technical partners, advertising and marketing agencies as contracted by us.

Partners will not be permitted to use your personal information for their own marketing purposes unless you have consented to receive marketing from them on another site, as we won't ask for your permission to do this on our website.



#### 7. How you can change permissions

Your privacy is of huge importance to us. All emails or other forms of communication directly from us to you will include clear instructions on how to unsubscribe. Plus, if you don't want to be contacted by us anymore you can email <u>tania@cotswoldhousehunter.co.uk</u>. Section 9 below also sets out your other information rights.

### 8. Your information rights and responsibilities

8.1. You already have certain rights under existing data protection legislation, including a right to request a copy of the personal information we hold on you, if you request it in writing. You have the following rights:

8.1.1. Right to correct: the right to have your personal information rectified if it is inaccurate or incomplete;

8.1.2. Right to erase: the right to request that we delete or remove your personal information from our systems;

8.1.3. Right to restrict our use of your information: the right to 'block' us from using your personal information or limit the way in which we can use it;

8.1.4. Right to data portability: the right to request that we move, copy or transfer your personal information;

8.1.5. Right to object: the right to object to our use of your personal information including where we use it for our legitimate interests, or where we use your personal information to carry out profiling to inform our market research and user demographics. If you raise an objection we will stop processing your personal information unless very exceptional circumstances apply, in which case we will let you know why we're continuing to process your personal information.

We will use reasonable efforts consistent with our legal duty to provide you with your rights in accordance with data protection legislation.

8.2. To make enquiries, exercise any of your rights set out in this Privacy Notice and/or make a complaint please contact <u>tania@cotswoldhousehunter.co.uk</u> or write to the Data Protection Officer at Cotswold House Hunter Limited, 49 Albion Street, Stratton, Cirencester, Gloucestershire, GL7 2HT.

Email: <u>tania@cotswoldhousehunter.co.uk</u> Mobile: 07977 585 716



8.3. If you're not satisfied with the way any complaint you make in relation to your personal information is handled by us then you may be able to refer your complaint to the relevant data protection regulator. In the UK, this is the Information Commissioner's Office.

#### 9. Cookies

9.1. We use cookies (files which are sent by us to your computer or other access device) and tracking technology to help to improve the functionality and performance of our website.

9.2. The information derived from our use of cookies will be aggregated to provide statistical information about the usage of our website. However, we do not use any information derived from cookies, nor any IP addresses we collect, to identify any individual user of our Website.

9.3. Some third-party technology we use (e.g., embedded videos, social sharing) also drop cookies to improve your experience on their sites.

9.4. For details on what cookies we use, information on how to stop them being stored or how to delete ones already stored, read our Cookie Policy.

# 10. Keeping your personal information secure

10.1. Keeping information about you secure is very important to us so we store and process your personal information in accordance with the high standards required under data protection legislation. From time to time and for operational reasons the personal information we collect from you may be transferred to and stored in countries outside of the European Economic Area ("EEA"). Your information may also be processed by some of our service providers which operate outside the EEA. Different countries have different data protection and security laws and some of these do not offer the same level of protection as you enjoy under UK data protection legislation. However, when we appoint our service providers to help us provide products and services to you (which may include some based in the USA), we take care to ensure that they have appropriate security measures in place.

10.2. We do our best to keep the information you disclose to us secure. However, we can't guarantee its security. By using our website you accept the inherent risks of providing information online and will not hold us responsible for any breach of security.

Email: <u>tania@cotswoldhousehunter.co.uk</u> Mobile: 07977 585 716



#### 11. How long do we keep your personal information?

Unless a longer retention period is required or permitted by law, we will only hold your personal information on our systems for the period necessary to fulfil the purposes outlined in this Privacy Notice or until you request it is deleted. If, having registered for any of our services, you do not use them for a reasonable time (which may vary depending on the service(s) you've registered for) we may contact you to ensure you're still happy to receive communications from us. Even if we delete your personal information it may persist on back-up or archival media for legal, tax or regulatory purposes.

We will retain your name, contact details and marketing data until you choose to unsubscribe from our marketing communications. At this point your name and contact details will be placed on a "suppression list" and after 15 years removed completely.

#### 12. How to contact us

Our Data Protection management is the responsibility of the Directors.

If you have any queries relating to our use of your personal information or any other related data protection questions, please contact us at <u>tania@cotswoldhousehunter.co.uk</u> or write to us at Cotswold House Hunter Limited, 49 Albion Street, Stratton, Cirencester, Gloucestershire, GL7 2HT.