

## **Privacy Policy - Fixed Rent Ltd**

This Privacy Policy explains how personal information is collected, used and disclosed by Fixed Rent Limited (FRL) This policy applies to users of our services and visitors to our sites.

By using our services or visiting our sites, to the extent permitted by applicable law, you are consenting to us gathering and processing information about you in accordance with this Policy, although consent may not be required for all of the elements described in this Policy.

### **What this Policy covers**

Your privacy is important to us, and so is being transparent about how we collect, use and share information about you. This Policy is intended to help you understand:

- What personal data we collect
- How we use your personal data
- Legal bases for processing your personal data
- Aggregated information
- Retention periods
- Cookies and tracking technologies
- Who we share your personal data with
- How we protect your personal data
- Your rights over your personal data
- External links
- How to contact us

This Policy covers the information we collect about you when you use our services, visit our sites, or otherwise interact with FRL. This Policy also explains your rights over your personal data including how you can object to certain uses of information about you and how you can access and update certain information about you.

### **What personal data we collect**

By using our services or visiting our sites, we may collect the following personal information: name, email address, telephone number and postal address. Depending on the service you are engaging with, we will collect other information relevant to and necessary for us to provide that service. For certain services, bank details or credit card information may be required.

We do not collect personal data considered as sensitive personal data such as health related information except when required for employees of Fixed Rent Ltd.

In addition, we may receive certain categories of personal data and some device information (such as your name, email, browsing history on our sites and other details) from sources other than you, such as from third party sites, applications and services.

### **How we use your personal data**

We may use your information for the following purposes: to provide you with services and fulfil your requests, to provide the functionality offered on our site, to pay for services, to respond to or follow up on enquiries, to tailor your experience on our site including displaying relevant properties, to

provide information and services to our customers, to perform statistical analysis, to protect against fraudulent, unauthorised or illegal activity, to comply with our policies, procedures and legal obligations and as otherwise consented to by you and as required or permitted by applicable law.

If you do not provide us with certain information, we may not be able to fulfil your request or provide certain services.

Generally we do not perform automated decision taking or 'profiling' by solely automatic means; there is human intervention in our processing and decision making.

### **Legal bases for processing data**

When you engage with Fixed Rent Ltd, there are a number of legal bases under which we may request, process and use your data, including:

Asking for your consent to receive email marketing. Your consent is not assumed and you can withdraw or change your consent at any time.

Where we have a legal duty, such as complying with anti-money laundering legislation

### **To enable us to fulfil a contract**

Legitimate interest, for example where we discuss related services or provide you with the details of properties to help with your property search to ensure we can best service your request and find you the right property.

Where the provision of data is a statutory or contractual requirement, or necessary to enter into or fulfil a contract, we will make this clear in our terms and conditions and contracts. Should the requested data be refused, it may not be possible to proceed with the service required.

### **Aggregated information**

We may aggregate personal information collected from you and other customers as well as device information and location information (with your consent, where required) to provide general statistics that cannot be linked to you or any other specific user and with which we attempt to provide you with a better experience to improve our services.

### **Retention periods**

We will retain your information for the period necessary to fulfil the purposes outlined in this Policy and as otherwise needed to comply with applicable law and internal company policies. The length of time between transactions in the industry has been taken into account when determining how long data is retained for.

### **Cookies and tracking technologies**

Technologies such as: cookies, beacons, tags and scripts may be used by Fixed Rent Ltd . These technologies are used in analysing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive

reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

Cookies are very small text files that are stored on your computer when you visit some websites. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. We use cookies to help identify your computer so we can tailor your user experience.

You can disable any cookies already stored on your computer, but these may stop our website from functioning properly. Please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) if you would like more information, including how to see what cookies have been stored in your web browser and how to manage and delete them.

Should you wish to opt out of Google Analytic tracking across all websites please visit <http://tools.google.com/dlpage/gaoptout>.

Calls made to phone numbers on our website and marketing materials may be recorded for training purposes.

Log File Information: Log file information is automatically reported by your browser each time you access a web page on our Service. When you access the Service, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include information such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, and other such information. We do not link this automatically-collected data to personally identifiable information.

The table below details the cookies we use across our website:

| Purpose  | Cookie lifetime         |
|--|-------------------------|
| Remembers a user session ID and holds details of last search criteria/paging/context   | Until browser is closed |
| Acceptance of cookies  | 12 months               |
| Authentication cookie for FRL  | 12 months               |
| Stores the frl username for personalisation  | 12 months               |
| Optimize cookies run A/B testing in order to develop and improve the website for future visitors. This cookie stores a visitor's unique Optimiser identifier using a combination of a 6 months timestamp and random number. No other information about you or your visits is stored. |                         |
| Optimiser cookie. As above, this cookie helps track data across redirects.   | 6 months                |
| Google Analytics cookies anonymously collect information about how visitors use our site. We use this information to develop and improve the website for future visitors. No personal information is collected or stored.  | 24 months               |

## **Who we share your personal data with**

We may share your data with third parties, to help manage our business and deliver services. These third parties may include but are not limited to:

Service providers, who help manage our IT and back office systems, and assist with our Customer Relationship Management activities.

Credit and reference checking agencies

Suppliers who need to carry out work on your property

Any regulators, which may include the ICO, as well as other regulators and law enforcement agencies

Solicitors and other professional services firms (including our Accountants)

## **How we protect your personal data**

Fixed Rent Ltd values your privacy and data security. We use third party services to help maintain the security and performance of our systems and sites. Email monitoring software and network traffic firewalls are also used. You can be assured that any personal data we gather about you through our sites, email, social media, telephone or other means will not be passed on to any third party or organisation except in the instances outlined above.

We will never change our bank details during the course of a transaction. Always query emails supposedly from us where the sender's email address does not match our domain or where the format, style or content is not usual. We will always check when we receive an instruction to amend our record of a customer's details.

If you receive something suspicious, please report it immediately to our manager: **email: [joe@fixedrent.co.uk](mailto:joe@fixedrent.co.uk)**

## **Your rights over your personal data**

Individuals have rights over their personal data, whether and how it is processed and other rights in law. If at any time you wish to make a subject access request or for your personal data to be amended or removed, please **email: [info@fixedrent.co.uk](mailto:info@fixedrent.co.uk)** write to us at:

E J O'Kelly

Managing Director

Fixed Rent Ltd

66 Paul Street

London

EC2A 4NE

You have the right to complain to the UK's statutory authority for data protection, the Information Commissioner, whose contact details can be found at <https://ico.org.uk/>.

## **External Links**

Please note this Policy does not apply to the practices of companies we do not own or control or to people that we do not employ or manage. We may link or otherwise provide access to third party sites. We provide these links for your convenience only. We have no control over, do not review and are not responsible for third party sites, their content, or any goods or services available through these third party sites.

## **How to contact us**

If you have any questions, comments or concerns about how we handle your personal data, you can contact our General Manager at: **[joe@fixedrent.co.uk](mailto:joe@fixedrent.co.uk)**

If at any time we change our Privacy Policy, such changes will be made on this page and dated. This Policy was last updated on 20th December 2018.