## **PRIVACY POLICY**

#### **BACKGROUND:**

Kaybridge Residential understands that your privacy is important to you and that you care about how your personal data is used. [We] OR [I] respect and value the privacy of everyone who visits this website, www.kbridge.co.uk ("[Our] OR [My] Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with [our] OR [my] obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy [is deemed to occur upon your first use of [Our] OR [My] Site] OR [is requested before you starts using our property search]. If you do not accept and agree with this Privacy Policy, you must stop using [Our] OR [My] Site immediately.

# 1. Information About [Us] OR [Me]

[Our] **OR** [My] Site is [owned and] operated by Kaybridge Residential, a Estate Agency [registered in England under company number 11421726].

[Registered address: Wesley House Bull Hill Leatherhead KT22 7AH.

[Main trading address:] OR [Address:].

[VAT number:.]

[Data Protection Officer: Kevin Barzegar.

Email address: kevin@kbridge.co.uk. Telephone number: 0208 0040 474.

Postal Address: Wesley House Bull Hill Leatherhead KT22 7AH.

[[We are] **OR** [I am] regulated by The Property Ombusdsman & Property Redress Scheme.

[[We are] OR [I am] a member of The National Approved Letting Scheme]

# 2. What Does This Policy Cover?

This Privacy Policy applies only to your use of [Our] OR [My] Site. [Our] OR [My] Site may contain links to other websites. Please note that [we] OR [I] have no control over how your data is collected, stored, or used by other websites and [we] OR [I] advise you to check the privacy policies of any such websites before providing any data to them.

## 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

# 4. What Are My Rights?

Under the GDPR, you have the following rights, which [we] OR [I] will always work to uphold:

- a) The right to be informed about [our] or [my] collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact [us] **OR** [me] to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data [we] **OR** [l] hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by [us] OR [me] is inaccurate or incomplete. Please contact [us] OR [me] using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask [us] **OR** [me] to delete or otherwise dispose of any of your personal data that [we] **OR** [l] have. Please contact [us] **OR** [me] using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to [us] **OR** [me] using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if [we are] **OR** [I am] relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to [us] OR [me] directly, [we are] OR [l am] using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask [us] OR [me] for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. [[We] OR [I] do not use your personal data in this way.]

For more information about [our] **OR** [my] use of your personal data or exercising your rights as outlined above, please contact [us] **OR** [me] using the details provided in Part 12.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about [our] **OR** [my] use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

# 5. What Data Do You Collect?

Depending upon your use of [Our] **OR** [My] Site, [we] **OR** [I] may collect some or all of the following personal [and non-personal] data:

[Name;]

- [Date of birth;]
- [Gender;]
- [Address;]
- [Email address;]
- [Telephone number;]
- · [Business name;]
- [Job title;]
- [Profession;]
- [Payment information;]
- [Information about your preferences and interests;]
- [IP address];
- [Web browser type and version;]
- [Operating system;]
- [A list of URLs starting with a referring site, your activity on [Our] **OR** [My] Site, and the site you exit to;]
- [.]

# 6. How Do You Use My Personal Data?

Under the GDPR, [we] **OR** [I] must always have a lawful basis for using personal data. This may be because the data is necessary for [our] **OR** [my] performance of a contract with you, because you have consented to [our] **OR** [my] use of your personal data, or because it is in [our] **OR** [my] legitimate business interests to use it. Your personal data [will] **OR** [may] be used for [one of] the following purposes:

- [Supplying [our] OR [my] [products] AND/OR [services] to you. Your personal details are required in order for [us] OR [me] to enter into a contract with you.]
- [Personalising and tailoring [our] OR [my] [products] AND/OR [services] for you.]
- [Communicating with you. This may include responding to emails or calls from you.]
- [Supplying you with information by [email] AND/OR [post] that you have optedin to (you may unsubscribe or opt-out at any time by Contacting Our Office.
- [.]

[With your permission and/or where permitted by law, [we] OR [I] may also use your personal data for marketing purposes, which may include contacting you by [email] AND/OR [telephone] AND/OR [text message] AND/OR [post] with information, news, and offers on [our] OR [my] [products] AND/OR [services]. You will not be sent any unlawful marketing or spam. [We] OR [I] will always work to fully protect your rights and comply with [our] OR [my] obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.]

[[We] OR [I] use the following automated system[s] for carrying out certain kinds of [decision-making] AND/OR [profiling]. If at any point you wish to query any action that

[we] OR [I] take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives you the right to do so. Please contact [us] OR [me] to find out more using the details in Part 12.

• [The following automated decision-making method(s) may be used:

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ο.

The following automated profiling may take place:

ο.

ο.

## 7. How Long Will You Keep My Personal Data?

[We] **OR** [I] will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- We will act as as data controller. We would like you to kept informed about suitable products and services, unless instruct us otherwise We will not pass your details to any third parties, but if you do not wish to receive information from us please confirm this in writing to the data protection officer Wesley House Bull Hill Leatherhead KT22 7AH
- [As part of our overall marketing strategy of properties like yours in the area, we may use the main image of your property in our further marketing campaigns in the event of agreed sale. If you do not consent to this, please contact the branch as soon as possible by email or telephone.

# 8. How and Where Do You Store or Transfer My Personal Data?

[[We] **OR** [I] will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.]

OR

[[We] OR [I] will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.]

OR

[[We] OR [I] may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the

EEA. This means that [we] **OR** [I] will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

[[We] OR [I] share your data within the group of companies of which [we are] OR [I am] a part. Where this involves the transfer of personal data outside the EEA, [our] OR [my] group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as "binding corporate rules". More information on binding corporate rules is available from the European Commission.]

#### OR

[[We] OR [I] share your data with external third parties, as detailed below in Part 9, that are based outside of the EEA. The following safeguard[s] [is] OR [are] applied to such transfers:

[[We] **OR** [I] will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection. More information is available from the European Commission.]

#### OR

[[We] OR [I] use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the GDPR. More information is available from the European Commission.]

#### AND/OR

[Where [we] OR [I] transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the European Commission.]]

Please contact [us] **OR** [me] using the details below in Part 12 for further information about the particular data protection mechanism used by [us] **OR** [me] when transferring your personal data to a third country.]

The security of your personal data is essential to [us] **OR** [me], and to protect your data, [we] **OR** [I] take a number of important measures, including the following:

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# 9. Do You Share My Personal Data?

[[We] OR [I] will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, [we] **OR** [I] may be legally required to share certain personal data, which might include yours, if [we are] **OR** [I am] involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.]

### OR

[[[We] OR [I] may share your personal data with other companies in [our] OR [my] group for Marketing. This includes [subsidiaries] AND/OR [[our] OR [my] holding company and its subsidiaries.]]

[[We] OR [I] may sometimes contract with the following third parties to supply certain [products] AND/OR [services]. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that [we] OR [I] hold.

- your personal data may be shared with land registry to confirm your owner ship of the property or with any other organisation to confirm your identity.
- Zoppla, Rightmove Alto.

If any of your personal data is required by a third party, as described above, [we] **OR** [I] will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, [our] **OR** [my] obligations, and the third party's obligations under the law, as described above in Part 8.]

[If any personal data is transferred outside of the EEA, [we] OR [I] will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.]

In some limited circumstances, [we] **OR** [I] may be legally required to share certain personal data, which might include yours, if [we are] **OR** [I am] involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.]

## 10. Can I Withhold Information?

You may access [certain areas of] [Our] **OR** [My] Site without providing any personal data at all. [However, to use all features and functions available on [Our] **OR** [My] Site you may be required to submit or allow for the collection of certain data.]

## 11. How Can I Access My Personal Data?

If you want to know what personal data [we] **OR** [I] have about you, you can ask [us] **OR** [me] for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12. [To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell [us] OR [me] everything [we] OR [I] need to know to respond to your request as quickly as possible.]

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover [our] **OR** [my] administrative costs in responding.

[We] OR [I] will respond to your subject access request within less than month and, in any case, not more than] one month of receiving it. Normally, [we] OR [I] aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date [we] OR [I] receive your request. You will be kept fully informed of [our] OR [my] progress.

## 12. How Do I Contact You?

To contact [us] **OR** [me] about anything to do with your personal data and data protection, including to make a subject access request, please use the following details [(for the attention of Mr Kevin Barzegar Email address: kevin@kbridge.co.uk Telephone number: 0208 0040 474.

Postal Address: Kaybridge Residential

Wesley House, Bull Hill Leatherhead KT22 7AH.

## 13. Changes to this Privacy Policy

[We] OR [I] may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if [we] OR [I] change [our] OR [my] business in a way that affects personal data protection.

Any changes will be immediately posted on [Our] **OR** [My] Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of [Our] **OR** [My] Site following the alterations. [We] **OR** [I] recommend that you check this page regularly to keep up-to-date.