

PROPOLY PRIVACY POLICY

1. INTRODUCTION

Propoly Online Limited (**Propoly, we, us, our**) operates the platform that your estate agent (**Agent**) uses to provide this website to you (**Portal**). Your Agent will provide access to their Portal by inviting you to register and will be solely responsible to you for the availability and provision of the Portal.

For the purposes of data protection law, your Agent is the 'controller' of the personal information that you submit to it via their Portal and which the Agent uses in connection with the lettings process. A 'controller' is an organisation that decides why and how your personal information will be used. As a service provider to your Agent, we are their 'processor' and generally process your personal information based on their instructions. Consequently, in relation to such uses, your personal information will be processed in accordance with your Agent's [Privacy Policy](#), and not this policy.

However, as the provider of the underlying platform to the Portal, we make certain uses of your personal information for our own business purposes, independently of the processing we perform for Agents. In relation to the processing we carry out for those purposes, we are a separate and independent controller.

The purpose of this Privacy Policy is to inform you of those uses and purposes for which we use your personal information as a controller, with whom we may share that information and your rights over such information.

HOW WE COLLECT YOUR PERSONAL INFORMATION

Personal information you give to us

This is information you give to us through the Portal, including: (a) when you register; (b) when you agree to allow us or our third party partners to market our or their products and services to you; and (c) that we initially collect for your Agent but for which you later consent for us to use for our own business purposes.

Personal information we collect about you:

We may automatically collect information about your use of the Portal, such as the number and duration of visits to the Portal, any search queries entered on the Portal, details of which particular pages have been visited and your activities generally in relation to the Portal and your interactions with other users.

We also automatically collect technical information, including anonymous data collected by the servers that host the Portal, the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform as well as cookie, tracking pixel and beacon identification information. Please see our [Cookies Policy](#) for further information.

2. HOW AND WHY WE USE YOUR PERSONAL INFORMATION

In relation to your personal information that we process as a controller, data protection law requires us to have a valid reason to process it for each of the different purposes for which we use that information. The law refers to each reason as a 'legal basis'. The purposes for which we use your personal information and the legal basis on which we rely to process it for each purpose is as follows:

2.1 Where you have provided CONSENT

We may use and process your personal information for the following purposes where you have **consented** for us to do so:

- to contact you via email or SMS (as you have indicated) with marketing information about products and services of ours and our third party partners or to share your contact details with third parties for them to contact you with marketing information about their products and services; and
- to merge your account on one or more portals (including this Portal) powered by us to create a consolidated service operated by us.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [Your rights](#) for further details.

2.2 **Where necessary to comply with our LEGAL OBLIGATIONS**

We will use your personal information to comply with our legal obligations:

- to keep a record relating the exercise of any of your rights relating to our processing of your personal information;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- to anonymise or delete your personal information when it is no longer required for the purposes described in this policy; and
- to handle and resolve any complaints we receive relating to our processing of your personal information as described in this policy. Please note that any complaints relating to the operation of the service should be directed to your Agent in the first instance.

2.3 **Where necessary for us to pursue a LEGITIMATE INTEREST**

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as a business for the following purposes:

Processing necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns

- to contact you by phone or post with marketing information about us or our third party partners unless you object;
- for analysis and insight conducted to inform our marketing and business strategies, and to enhance and your visitor experience;
- to supply your details to social media and other online platforms operated by other companies for them to contact you with our targeted advertising online, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us;
- to identify and record when you have received, opened or engaged with the Portal or our electronic communications (please see our [Cookie Policy](#) for more information).

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

- for internal operations, including troubleshooting, testing, statistical purposes;
- for the prevention of fraud and other criminal activities;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- for the purposes of corporate restructure or reorganisation or sale of our business or assets;
- for efficiency, accuracy or other improvements of our databases and systems, for example, by combining systems or consolidating records we hold about you;
- to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings;
- to inform you of updates to our terms and conditions and policies; and
- for other general administration including managing your queries, complaints, or claims, and to send service messages to you.

3. OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL INFORMATION

We may disclose your information to our third party service providers, agents and subcontractors (**Suppliers**) for the purposes set out above. Our Suppliers can be categorised as follows:

Recipient / relationship to us	Industry sector (& sub-sector)
Advertising, PR, digital and creative agencies	Media (Advertising & PR)
Estate and lettings agencies	Estate agents (Residential)
Cloud software system providers, including database, email and document management providers	IT (Cloud Services)
Delivery and mailing services providers	Logistics (Delivery Service)
Facilities and technology service providers including scanning and data destruction providers	IT (Data Management)
Insurers and insurance brokers	Insurance (Underwriting & Broking)
Legal, security and other professional advisers and consultants	Professional Services (Legal & Accounting)
Market and customer research providers	Media (Market Research)
Social media platforms	Media (Social Media)
Website and data analytics platform providers	IT (Data Analytics)
Website and App developers	IT (Software Development)
Website hosting services providers	IT (Hosting)

When sending your information to third parties, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

When we share your personal information with any third parties that are controllers of that information, they may disclose or transfer it to other organisations in accordance with their data protection policies. This does not affect any of your data subject rights as detailed below. In particular, where you ask us to rectify, erase or restrict the processing of your information, we take reasonable steps to pass this request on to any such third parties with whom we have shared your personal information.

Other ways we may share your personal information

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal information if we are under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our customers. We will always take steps with the aim of ensuring that your privacy rights continue to be protected.

4. WHERE WE STORE YOUR PERSONAL INFORMATION

All information you provide to us may be transferred to countries outside the UK and the EEA. These countries may not have similar data protection laws to the UK and so may not protect the use of your personal information to the same standard.

If we transfer your information outside of the UK or the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include:

- ensuring the non-EEA countries to which transfers are made have been deemed adequately protective of your personal information for the purposes of data protection law by the relevant bodies;
- imposing contractual obligations on the recipient of your personal information using provisions formally issued by relevant bodies for this purpose.; or
- ensuring that the recipients are subscribed to 'international frameworks', such as the EU-US Privacy Shield that aim to ensure adequate protection.

Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy of the relevant documents.

If you use our services whilst you are outside the UK or the EEA, your information may be transferred outside the UK or the EEA in order to receive those services.

5. HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR

We do not retain personal information in an identifiable format for longer than is necessary.

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws. All personal information that we collect will be retained for as long as is necessary as required by applicable law. After such time, those data may be retained in fully anonymized form, and then used in order to improve our services.

The exceptions to this is where:

- you exercise your right to require us to retain your personal information for a period longer than our stated retention period (see further [Erasing your personal information or restricting its processing](#) below);

- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further [Erasing your personal information or restricting its processing](#) below);
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible; or
- in limited cases our legal obligations or a court or regulator requires us to keep your personal information for a longer or shorter period.

6. SECURITY AND LINKS TO OTHER SITES

We implement appropriate technical and organisational measures to keep your personal information safe and secure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information whilst it is transmitted to us and any transmission is at your own risk. Once we have received your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

7. COOKIES

Like many other websites and online platforms, the Portal uses cookies (including Google Analytics cookies) to obtain an overall view of visitor habits and visitor volumes to the Portal. 'Cookies' are small pieces of information sent to your computer or device and stored on its hard drive to allow the Portal to recognise you when you visit.

It is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit our [Cookies Policy](#).

8. AUTOMATED DECISION MAKING

We do not envisage that any decisions that have a legal or significant effect on you will be taken about you using purely automated means, however we will update this policy and inform you if this position changes.

9. YOUR RIGHTS

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month from either the date that we have confirmed your identity or, where we do not need to do this because we already have this information, from the date we received your request.

- **Accessing your personal information**

You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

- **Correcting and updating your personal information**

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you.

In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this policy.

- **Withdrawing your consent**

Where we rely on your consent as the legal basis for processing your personal information, as set out under [How and why we use your personal information](#), you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so using our unsubscribe tool. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

- **Objecting to our use of your personal information**

Where we rely on your legitimate business interests as the legal basis for processing your personal information for any purpose(s), as out under [How and why we use your personal information](#), you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your personal information for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your personal information.

You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please use our unsubscribe tool.

- **Erasing your personal information or restricting its processing**

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to continue processing, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

- **Transferring your personal information in a structured data file ('data portability')**

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under [How and why we use your personal information](#), you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

- **Complaining to a data protection regulator**

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.

10. CHANGES TO THIS PRIVACY POLICY

We may review this policy from time to time and any changes will be notified to you by email, where possible, or otherwise by posting an updated version of this policy to the Portal. Any changes will take effect 7 days after the date of our email or date of posting (as applicable), unless we state otherwise. We recommend you regularly check for changes and review all updates to this policy.

11. CONTACT US AND COMPANY INFORMATION

Please direct any queries about this policy or about the way we process your personal information to our Data Protection Manager using our contact details below.

If you wish to write to us, please write to Propoly, 5 Technology Park, Colindeep Lane, Colindale, London, United Kingdom, NW9 6BX.

Our email address for data protection queries is info@propoly.com.

Our registered company details are as follows:

Name: Propoly Online Limited **Place of incorporation:** England and Wales

Registered office address: 5 Technology Park, Colindeep Lane, Colindale, London, United Kingdom, NW9 6BX

Company registration number: 09099516

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