



Privacy Statement

April 2018

Introduction

Times Place Ltd is committed to protecting and respecting your privacy. Time Place Ltd (“we”) promises to respect any personal data you share with us, or that we get from other organisations and keep it safe. We are subject to the General Data Protection Regulation (GDPR), which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws. It is important you read this privacy policy as it contains vital information on who we are and why and how we collect, store, use and share your personal information. This policy also outlines your rights in relation to your personal information and how to contact us or the relevant authorities in the event you have a complaint. Our aim is to be clear when we collect your data and not do anything you would not reasonably expect.

Personal Information about you

We may collect and use the following personal information about you:

- Your name and contact information, including email address and telephone number and company details and employment details if applicable
- Information to enable us to check and verify your identity, e.g. your date of birth
- Details of referee or guarantors to secure a property
- Your gender information, if you choose to give this to us
- Your billing information, transaction and payment card information
- Your professional or personal online presence, e.g. social media, if you share it with us
- Your contact history, transaction and instruction history with us

- Your nationality and immigration status and information from related documents, such as your passport or other identification, and immigration information, e.g. if you are a potential tenant applying for a tenancy
- Information to enable us to undertake Anti Money Laundering and Terrorist Financing electronic checks on you
- Information about how you use our website, IT, communication and other systems
- Your responses to surveys, competitions and promotions

Please note this personal information is required to provide our services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing services to you. We do not collect use or process special category personal information, such as racial or ethnic origin, political opinions, religious beliefs, trade union membership, Genetic and biometric data, Data concerning health, sex life or sexual orientation.

How your personal information is collected

We collect most of this personal information directly from you—in person, by telephone, text or email and/or via our website. However, we may on rare occasions also collect information from publicly accessible sources, e.g. Companies House or HM Land Registry. We may also collect information from other publicly accessible sources such as:

- Directly from a third party, e.g.: – sanctions screening providers; – credit reference agencies; – customer due diligence providers; Reference checks
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party; or
- Where you have given consent.
- From cookies on our website— Cookies

The Cookies that we use can be broken into two categories:

Cookies which are necessary to run the websites

Some of our site cookies are essential to run the websites and without the acceptance or use of these cookies the website or elements of the website will not work.

These include, but are not limited to:

- Remembering items in a shopping basket if you leave the website

Cookies which are optional

All other cookies are optional and the removal of these cookies may decrease the usability or performance of our websites. Such optional cookies include, but are not limited to:

- Your optional settings
- Tracking usage of a website

What will happen if you disable some or all of the cookies that Times Place Lts uses?

If you opt to disable some or all cookies, we are unable to guarantee that our websites will operate.

How do I manage my cookie settings?

Internet browsers (such as but not limited to Internet Explorer, Google Chrome, Firefox, Opera or Safari) will allow some control over most cookies through their settings. You will need to refer to the operating manual or review the settings of your browser software to identify what cookies are on your device and how to remove them.

Acceptance of cookie use

By continuing to use our website you will have been deemed to have agreed to our use of cookies subject to any preferences you may have indicated to us or any overriding browser settings you may have.

We use your personal information under the legitimate interest basis for using and processing. Legitimate Interest may be used as a basis for processing when we have a business or commercial reason to process your information, so long as this is not overridden by your own rights and interests. When we use and process your personal information for our legitimate interest, we will consider and balance any potential impact on you and your rights under data protection and any other relevant laws. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your valid consent or are otherwise required or permitted to by law).

We have set out some of our common reasons for using your personal information below;

What we use your Personal Information	Our reasons
To provide general service to you	To set up our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Times Place Ltd	To minimise fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions. Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator . And Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations

Marketing our services to: - existing and former customers; - third parties who have previously registered with us or expressed an interest in our services; - third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers and contacts For our legitimate interests, when such information is in the public domain
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services

Marketing Purposes

We may use your personal information to send you updates (by email, telephone calls, SMS or post) about our services, including exclusive offers (mainly for free market appraisal of your property), or highlighting of current market trends and properties on the market that may be of interest to you. We have a legitimate interest in processing your personal information for marketing purposes (see above 'How and why we use your personal information').

This means we do not usually need your consent to send you marketing communications. However, where consent is needed, we will ask for this consent separately and clearly. We will always treat your personal information with the utmost respect and never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications from us at any time by:

- Contacting us by post at 172 Garratt Lane, London, SW18 4DA or by telephone at 020 88707999 or:
- Using the 'unsubscribe' link in marketing emails: this will unsubscribe you from all marketing communications but you will still be able to receive property details if you are an applicant buyer or tenant (or send us an email on zak@timesplace.co.uk to opt out.

How we keep your data safe and who has access

We ensure that there are appropriate technical controls in place to protect your personal details. For example our online forms are always encrypted and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff.

We use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them. Especially regarding how they manage the personal data they have collect or have access to.

Our current suppliers run their operations inside the European Economic Area (EEA). If in the future we need to use suppliers outside the EEA, although they may not be subject to same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA. We will only ever share your data if we have your explicit and informed consent. We may also need to disclose your details, if required, to the police, regulatory bodies or legal advisors. Keeping your information up to date.

Where possible we use publicly available sources to keep your records up to date; for example, the Post Office's National Change of Address database and information provided to us by other organisations as described above. We really appreciate it if you let us know if your contact details change.

Who we share your personal information with

We routinely share personal information with:

- Third parties we use to help deliver our services to you, e.g. payment service providers, tenants' vetting companies, electronic search providers, maintenance contractors, inventory companies etc.;
- Other third parties we use to help us run our business, e.g. website suppliers, case management system providers etc.;
- Third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;
- Credit reference agencies;
- Our banks; we only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers (where possible) to ensure they can only use your personal information to provide services to us and to you. We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

- We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. The recipient of the information will be bound by confidentiality obligations.

Where your personal information is held

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents.

How long your personal information will be kept

We will keep your personal information while you have an active matter with us or we are providing services to you. We will keep your personal information, as a minimum, for as long as necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly;
- To keep records required by law. and thereafter
- 5 years from any last communication with you for marketing of our services to you

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Transferring your personal information out of the European Economic Area
We do not transfer your personal information out of the EEA

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it.

Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Your right to know what we know about you, make changes or ask us to stop using your data

The accuracy of the data we hold on you is important to us. You have a right to ask us to stop processing your personal data, and if it's not necessary for the purpose you provided it to us

for we will do so. Contact us if you have any concerns. We will not use your information for marketing purposes if you have indicated that you do not wish to be contacted for such purposes.

However, we will retain your details on a suppression list to help ensure that we do not continue to contact you. You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, send a description of the information you want to see and proof of your identity by post to The Data Compliance Officer, Times Place Ltd, 172 Garratt Lane, London, Sw18 4DA. We do not accept these requests by email so we can ensure that we only provide personal data to the right person. If you have any questions please send these to Zak@timesplace.co.uk.

Changes to this Policy We may change this Privacy Policy from time to time.

If we make any significant changes in the way we treat your personal information we will make this clear on Times Place's website or by contacting you directly. If you have any questions, comments or suggestions, please let us know by contacting the The Data Compliance Officer, Times Place Ltd, 172 Garratt Lane, London, Sw18 4DA or emailing zak@timesplace.co.uk with "Data Compliance query" in the subject line.

If you would like to receive regular communications but have not opted in please contact us 0208 8707999 on or zak@timesplace.co.uk

By using our website or any of our services, or providing us with any personal data, you agree to your personal data being used and disclosed in the manner set out in this policy.