



## Privacy Policy

The Glades is committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <http://theglades.uk> (our Site) you are accepting and consenting to the practices described in this policy.

### The small print

The term The Glades is the trading name of Jakani Limited.

For the purposes of this policy the above will be referred to as The Glades. For the purpose of the General Data Protection Regulations (GDPR, which came into effect on the 25th May 2018), the company as described above is its own data controller, with its registered office address at 123 Fonthill Road, London N4 3HH.

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or such third parties use of your personal data. Please check these policies before you submit any personal data to these websites.

Our nominated Data Protection Officer is Joy Ogbechi.

Questions, comments and requests regarding this privacy and cookies policy are welcomed and should be addressed to [dp@theglades.uk](mailto:dp@theglades.uk) or c/o 123 Fonthill Road, London N4 3HH.

We may collect and process the data about you as outlined below:

### Information we may collect about you

Our aim is to maintain your data as accurately as possible and to collect data for a specified, explicit and legitimate reason. The data should be limited to what is necessary for us to provide you with property-related information or undertake business transactions for you. Fair and transparent treatment of your data is essential.

### Information you give us

You may give us information about you by filling in forms on our Site or by corresponding with us by phone, e-mail, post or otherwise.

Typically, the information will require your name, address and contact details (telephone and email), but may include additional details that you provide.

This includes information you provide when you request a viewing for a property, request a valuation on our Site, list your own property, submit any general enquiry, enter a competition, promotion or survey, and when you report a problem with our Site.

For certain customers we may require additional personal data such as your bank details (e.g. for payment of rent), or your residency status (for tax purposes).

### **Information we may collect about you**

With regard to each of your visits to our Site we may automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locator (URL) clickstream to, through and from our Site (including date and time); properties you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.

### **Information we receive from other sources**

We may receive information about from the property portals that we use, for example, Zoopla and Prime Location, whenever you submit an enquiry to us via these portals. The data required will typically include your name, address and contact (telephone and email) details.

We also collect information for certain organisations, where appropriate and always with legal grounds to do so. These include fraud prevention agencies, credit check reference/vetting agencies and identity check providers.

We may also work closely with third parties (including, for example, our business partners, analytics providers and search information providers) and may receive information about you from them.

### **Uses made of the information**

The GDPR provides for six lawful bases for processing your data. Of these, the most relevant ones to our business are: 'Contractual', 'Legal Obligation', 'Legitimate Interest' and 'Consent', and these are outline below. For more information on the lawful bases please see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>

'Contractual' relates to the processing necessary for us to perform our obligations to you. Examples of this type of processing include providing personal details on a memorandum of sale, capturing details of potential purchasers at the point of the viewing and management of the sale/purchase of property.

'Legal Obligation' relates to the various laws that apply generally, such as the legal requirement to keep transactional records for a specified amount of time, and specifically to our industry, for example, the Estate Agents Act 1979 and the Money Laundering Regulations 2007. An example of this type of processing is Customer Due Diligence (checking your identity) when you enter into a contract with us, or when you have your offer on a purchase accepted.

'Legitimate Interest' relates to The Glades' necessary processing to allow us to do business. Examples of this type of processing include fraud prevention, direct marketing (e.g. sending a weekly email containing the latest property pages we submit in the regional newspapers if you are a buyer), networking within our own group, business analysis for internal operations and improvement, and monitoring and enhancing our Site

If we use the lawful basis of 'Legitimate Interest' we will always have performed a series of checks including; a purpose test, a necessity test and a balancing test, to ensure that no process we perform will cause unwarranted harm to you.

'Consent' relates to other processing, typically of a marketing nature, whereby we may send you information that we think may be of interest to you, based on your initial role, and later based on your own selected preferences. Examples of this type of processing include an email newsletter containing links to our latest blogs and articles, and other emails pertaining to local events that you may be interested in.

Consent relies on you agreeing that we can do this. Once you have consented (opted-in) to receive continuous communication from us, it is also easy to withdraw consent (opting-out) by unsubscribing from the communication e-mailed to you or by e-mailing our Data Protection Officer on [dpo@theglades.uk](mailto:dpo@theglades.uk) with your request.

Opting out of receiving marketing communications does not mean that you will stop receiving emails relating to the services that you have asked us to provide.

## **We use information held about you in the following ways:**

### Information you give to us

.We will use this information, for example:

If you are a Seller or a Landlord:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;
- to comply with our legal obligations to carry out due diligence with regard to your identity prior to commencing a business relationship;
- to provide details of your property to interested parties if you ask us to provide property marketing services (which we will display on our Site, at our offices, in marketing emails and on information sheets we produce to market your property);

If you are looking to buy or rent:

- to notify owners of properties that you tell us you are interested in;
- to store your property preferences and search criteria so that we may contact you with details of properties which may be of interest to you;

If you become a Prospective Buyer:

- to carry out our obligations arising from any contracts you may enter or have entered into with our sellers;
- to comply with our legal obligations to carry out due diligence with regard to your identity prior to commencing a business relationship, which means from appoint your offer has been accepted;

If you become a Prospective Tenant:

- to comply with our legal obligation to determine that you have a 'Right to Rent';
- to carry out our obligations to ensure that you can afford to rent, and to request your details for referencing purposes;
- to carry out our obligations arising from any contracts you may enter or have entered into with our landlords;

In general:

- to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
- to provide you, with information about services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS or phone) with information about services similar to those which were the subject of a previous sale or negotiations of a sale to you;
- to ensure that content from our Site is presented in the most effective manner for you and for your computer or mobile device.

### Information we collect about you

We will use this information:

- to keep our Site safe and secure;
- to measure or understand the effectiveness of marketing we serve to you and others, and to deliver relevant marketing to you;
- to make suggestions and recommendations to you and other users of our Site about goods or services that may interest you or them.

Information we receive from other sources

We may combine this data with information you give to us or that we collect about you for the purposes set out above (depending on the types of information we receive).

## **Disclosure of your information**

We may share your personal information with any member of our group, this being the list of companies referred to in the introduction.

We may share your information with selected third parties:

Members of the Public who use our services

- individuals or organisations interested in a property you own if you ask us to provide property marketing services;
- individuals or organisations who own a property if you indicate to us that you are interested in that particular property;

### **Third Party companies who we work with;**

- companies who are engaged to perform services for or on behalf of The Glades, e.g. suppliers and sub-contractors for the performance of any contract we enter into with you, or any contract we set up which relates to you, whether it be current or potential;
- third parties that we use to serve you lawfully based marketing/transactional communications via email;
- business partners and suppliers for the fulfilment of any legal obligations that we may have relating to you;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- analytics and search engine providers that assist us in the improvement and optimisation of our Site;
- property developers or new homes sites including, but not limited to, those with an ongoing agreement with The Glades to introduce applicants to properties subject to that arrangement and/or within the remit of your property requirements or instructions.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if any of the companies referred to as The Glades or substantially all of any company's assets are acquired by a third party, in which case personal data held by that company about its customers will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Website Use and other agreements; or to protect the rights, property, or safety of The Glades and its staff, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **Where we store your personal data**

The data that we collect from you is stored and processed within the European Union. By submitting your personal data, you agree to this storing and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **How long we keep your personal data for**

We will keep your personal data for as long as we are required to by law. Typically, where a sale or tenancy takes place then the legal requirement is to keep the records for 6 years after the end of the transaction. We will keep some personal information for a reasonable period after your transaction has completed, in case you decide to use our services again. We may contact you about our services during this time (where appropriate by using the lawful basis of Legitimate Interest) if you haven't opted out of receiving marketing communications from us. If there's no legal requirement, we'll only store it for as long as we need to.

## Your rights

We will not share your personal data with third parties for marketing purposes unless we obtain your permission to do so. We may use your personal data for our own internal marketing purposes and to contact you in accordance with the terms of this Privacy and Cookies Policy. You have the right to ask us not to process your personal data for any marketing purposes. You can exercise the right at any time by contacting us at [dpo@theglades.uk](mailto:dpo@theglades.uk).

Your data protection rights are as follows:

- The right to be informed
- The right of access
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- The right not to be subject to automated decision-making including profiling
- You have a right to lodge a complaint with the Supervising Authority, which is The Information Commissioner who can be contacted in various ways as detailed at <https://ico.org.uk/global/contact-us/>

More information on your individual rights can be seen on The Information Commissioner's website at <https://ico.org.uk/>. We would however, appreciate the opportunity to resolve any concerns you may have, by, in the first instance, contacting us as detailed in this policy.

## Information about our use of Cookies

Our Site uses cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. By continuing to browse the Site, you are agreeing to our use of cookies

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Site.

### **We use the following cookies:**

- *Strictly necessary cookies.* These are cookies that are required for the operation of our Site.
- *Analytical/performance cookies.* They allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using it. This helps us to improve the way our Site works, for example, by ensuring that users are finding what they are looking for easily.
- *Functionality cookies.* These are used to recognise you when you return to our Site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- *Targeting cookies.* These cookies record your visit to our Site, the pages you have visited and the links you have followed. We will use this information to make our Site and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.