

# Privacy Notice and Cookie Policy

Welcome to Croft Estates London Limited (CEL)'s. privacy notice.

**CEL respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data, how we use it, the conditions under which we may disclose it to others, how we keep it secure and tell you about your privacy rights and how the law protects you.**

## Introduction

We may update this policy on occasion to please do check to ensure that you are happy with any changes. By using our website, and by the provision of information to us you will constitute acknowledgment of the terms of this privacy policy.

Please do not send us any of your information if you do not want it to be used in the ways described in this privacy policy.

## Important information and who we are

### Purpose of this privacy notice

This privacy notice aims to give you information on how CEL collects and processes your personal data, including any data you may provide through this website when you use our services, and/or request marketing to be sent to you.

This website is not intended for children and we do not knowingly collect data relating to children.

By using CEL websites and/or mobile applications or otherwise providing your Personal Information to CEL, you agree to the collection, use and sharing of your information in accordance with this Privacy Statement. Personal Information is information, or any combination of separate pieces of information, that could be used to identify you.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

# Privacy Notice and Cookie Policy

## Controller

CEL is the data controller and responsible for any personal information provided to us when you use our services (collectively referred to as "CEL", "we", "us" or "our" in this privacy notice).

**Full name of legal entity:** Croft Estates London Limited

**Email address:** admin@croftestates.com

**Postal address:** Croft Estates London Limited, Suite 58, 176 Finchley Road, London, NW3 6BT

**Telephone number:** +44 (0)203 830 8882

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](http://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.

## Changes to the privacy notice and your duty to inform us of changes

This version was last updated in July 2022.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

1. **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.

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2. **Client Due Diligence Data** includes company information, copies of proof of ID e.g., passport and copies of proof of address e.g., utility bill.
3. **Contact Data** includes delivery address, billing address, email address and telephone numbers.
4. **Financial Data** includes bank account and payment card details.
5. **Transaction Data** includes details about payments to and from you and other details of services we provide to you.
6. **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
7. **Profile Data** includes your username and password, preferences, interests and any other related information.
8. **Usage Data** includes information about how you use our website and services.
9. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do **not** collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to terminate the provision of the service but we will notify you if this is the case at the time.

### How is your personal data collected?

We use different methods to collect data from and about you including through:

1. **Direct interactions.** You may give us your Identity, Contact, Technical and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  2. enquire about or use our services;
  3. register interest in a property (including through our website);

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4. subscribe to our online property update service;
5. utilise the valuation service on our website;
6. request marketing to be sent to you; or
7. give us some feedback.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

Technical Data, Profile Data, Usage Data, Marketing and Communication Data and Aggregated Data from the following parties:

1. analytics providers such as Google based outside the EU;
2. advertising networks;
3. search information providers;
4. third party providers of technical, payment and delivery services;
5. third party data brokers; and
6. from publicly available sources.

### How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

1. Where we need to perform the contract we are about to enter into or have entered into with you.
2. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
3. Where we need to comply with a legal or regulatory obligation.
4. Where we have your consent to do so.

### Purposes for which we will use your personal data

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please see paragraph 10 if you

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need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

We use your information to:

1. Register you as a new applicant/vendor/landlord
2. Legal Basis: Necessary for our legitimate business interests
3. Provide the services in respect of which you have instructed us including:
  1. To collect and manage rent payments on behalf of landlords and pass this money on to the landlord
  2. To collect and recover money owed to us
  3. Legal Bases: a. Performance of a contract with you; b. Necessary for our legitimate interests (to recover debts due to us)
4. Deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you
5. Legal Basis: Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
6. Make suggestions and recommendations to you about properties or other services that we think may be of interest to you
7. Legal Basis: Necessary for our legitimate interests (to develop services and grow our business)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

1. **Promotional material from us** We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you and may send marketing information containing this information occasionally. This is how we decide what may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you registered on our website and, in each case, you have not opted out of receiving that marketing.
2. **Third-party marketing**, we will get your express opt-in consent before we share your personal data with any company outside of REL for marketing purposes.
3. **Opting out** You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting our DPO using the contact details in paragraph 1 above. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service which you have requested that we provide.
4. **Cookies** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please

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note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

5. **Change of purpose** We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our DPO. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### Disclosures of your personal data

We may have to share your personal data with third parties for the purposes set out in paragraph 4 above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

### Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

### Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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In particular, we will retain:

1. Identity Data and Contact Data:
  1. Where we are marketing a property, until it is sold or let or we cease to have the instruction;
  2. Where instructed by applicants, until a property is bought via CEL or until applicants inform us that they have purchased or rented a property elsewhere;
  3. Where instructed by a vendor/landlord, we may write and confirm terms of business, keep them informed of the progress of the marketing and sale or let of their property.
2. Financial Data:
  1. Landlord bank account details, which is used to pay rent into, refund fees or deposit allocated.
  2. Tenant bank account details until we return the deposit at the end of the tenancy.
  3. We are required by law and/or by our insurers to keep certain information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

1. Request access to your personal data.
2. Request correction of your personal data.
3. Request erasure of your personal data.
4. Object to processing of your personal data.
5. Request restriction of processing your personal data.
6. Request transfer of your personal data.
7. Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact the DPO for Subject Access Rights.

### No fee usually required:

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded,

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repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you:

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond:**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Glossary

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting our DPO.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES (without limitation)**

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.



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Service providers who provide IT and system administration services, or who assist us with customer insight marketing analytics.

Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

Other agents with whom we may be jointly instructed or with whom we liaise at your request.

To register a tenant's deposit with the Tenant Deposit Scheme.

Inventory companies for tenant check in and check out at the commencement and end of the rental period.

Details to contractors of managed properties.

Other third parties we may pass information to include mortgage brokers, interior designers, furnishing companies, etc. but we will never do so without seeking express permission from you first.

### Your legal rights

You have the right to:

1. Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
2. Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
3. Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
4. Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some

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cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

5. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
6. Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
7. Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

### Cookies on CEL Ltd (CEL)'s Sites

Cookies are small text files that are placed on your computer by websites that you visit. 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.

Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

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## Session cookies

Session cookies last only for the duration of your visit and are deleted when you close your browser. These facilitate various tasks such as allowing a website to identify that a user of a particular device is navigating from page to page, supporting website security or basic functionality.

## Persistent cookies

Persistent cookies last after you have closed your browser, and allow a website to remember your actions and preferences for when you next return. Sometimes persistent cookies are used by websites to provide targeted advertising based upon the browsing history of the device but not on this website.

1.1 This Website may place and access certain Cookies on your computer. CEL uses Cookies to improve your experience of using the Website and to improve our range of services. CEL has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

1.2 All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

1.3 Before the Website places Cookies on your computer, subject to Clause 1.4 and or 1.7, you will be presented with message bar informing that continuing beyond this page will be considered consent to set those cookies. By giving your consent to the placing of Cookies you are enabling CEL to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

1.4 Certain features of the Website depend upon Cookies to function. UK and EU Cookie Law deems these Cookies to be "strictly necessary". These Cookies are shown below. Your consent will not be sought to place these Cookies. You may still block these cookies by changing your internet browser's settings as detailed below.

1.5 This website places the following cookies:

1. Google Analytics
2. Facebook Pixel
3. Youtube Cookies

1.6 This Website uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how Users use the Website. This, in turn, enables us to improve the Website and the services offered through it. You do not have to allow us to use these Cookies, as detailed below, however whilst our use of them does not pose any risk to your privacy or your safe use of the Website it does enable us to continually improve our business.

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1.7 The analytics services used by this Website use Cookies to gather the required information. These Cookies may be placed immediately when you decide to visit the Website and it may not be possible to obtain your prior consent. You may remove these Cookies and prevent future use of them by following the steps set out below.

Download Chrome internet browser, and visit the CEL website in 'incognito mode'.

1.8 The analytics services used by this Website use the following Cookies:

### Google Analytics

1.9 You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

1.10 You can choose to delete Cookies at any time however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

1.11 It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

1.12 YouTube uses cookies to help maintain the integrity of video statistics, prevent fraud and to improve the site experience, among other things. YouTube use cookies on both [www.youtube.com](http://www.youtube.com) and on videos embedded from [www.youtube.com](http://www.youtube.com)

We use YouTube's Privacy-Enhanced mode on embedded videos. This mode restricts YouTube's ability to set cookies for a user who views a web page that contains a privacy-enhanced YouTube embed video player, but does not click the video to begin playback. YouTube may still set cookies on the user's computer once the visitor clicks the YouTube video player, but YouTube will not store personally identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode.