

# HAZELWELLS – PRIVACY POLICY & UPDATED TERMS

EFFECTIVE MAY 25<sup>TH</sup> 2018

| PRIVACY POLICY (PAGES 1-3)

| UPDATED TERMS (PAGES 4-5)

This Privacy Policy sets out how Hazelwells uses and protects any information that you provide when you engage with Hazelwells – and outlines the lawful bases for the processing of such personal data in-line with the European GDPR. Hazelwells is committed to ensuring that your privacy is protected. If you provide certain information in the course of your dealings with us, by which you can be identified and contacted, then you can be assured that it will only be used in accordance with this privacy statement. Our website is not intended for use by children. Hazelwells acts as both Data Controller and Data Processor along with other third party data processors who may also handle personal data in-line with the European GDPR. Hazelwells may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from May 2018.

What we collect - We may collect the following information including but not limited to: *Identity Data* including but not limited to your full name, date of birth, status and job title; *Contact Data* including but not limited to email address, address and phone numbers; *Communications Data* including but not limited to marketing preferences and promotions; *Usage Data* including but not limited to preferences and other information relevant to applications, contracts, customer surveys, security procedures both online and offline; *Financial Data* including but not limited to banking details, charges and payment history, income and credit reference data.

How we collect your information – We may collect your personal data and other information using different methods, both online and offline, when you: apply for our services; register your details with us; subscribe to our updates; request direct marketing; engage with us on social media; enter competitions/promotions or surveys; provide feedback; visit us in branch; call us.

What we do with your information - We process personal data to meet our legal obligations of accurate internal record keeping, understand your needs and provide our services. We may also use your information to contact you for research purposes. We may contact you by email, phone, fax or postal mail. We may use the information we gather internally to improve our products and services. We may use the information to customise the marketing we send to you. We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address or other contact details you have provided.

Data Security - We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial processes to safeguard the information we collect both online and on paper. Our data security is subject to ongoing updates and reviewed on a continual basis. We may at times engage external third parties to assist us who operate under the duty of confidentiality.

Consent – By providing your details to Hazelwells (and/or any third party for whom we act as an agent), you consent to us contacting you to discuss both your initial enquiry and any subsequent negotiations along with any other relevant communications and direct marketing. Your consent can be withdrawn for the purposes of marketing at any time, however, we may still be required to retain your details on file for a number of other purposes as outlined below.

Contract – If you have entered into business with us (and/or any third party for whom we act as an agent) on a contractual basis then we are legally required to hold and process the personal data you have provided in order to comply with our obligations under such contract. This may also apply where you have begun discussions with us (and/or any third party for whom we act as an agent) as a first pre-contractual step towards negotiations of a contract, at which point we will be required to process your personal data in order to progress towards any potential contractual agreement and to exercise the performance of any such contract.

Legal Obligations - There are numerous instances where Hazelwells may be subject to a legal obligation under both EU and UK law which may require personal data to be held and processed in order for us to fulfill such legal obligations and remain compliant with the law. This does not mean that there must be a legal obligation specifically requiring the specific processing activity – however, data may be held in order to comply with a number of regulatory requirements, such as: The Proceeds of Crime Act 2002, The Immigration Act 2014; The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017; to name just a few recent pieces of legislation under which we are obliged to retain relevant records.

Vital Interests – As a responsible agent and managing agent, Hazelwells will require personal data for all occupiers of property along with Next of Kin information and other personal data which may be held for processing in order to secure the vital interests of the subject or of another natural person. This vital interest includes but is not limited to medical emergencies and other emergencies.

Public Task – Hazelwells will provide personal data to external official authorities in line with our legitimate interest in order to allow said official authority to carry out its public task/duty. This includes, but is not limited to public authorities, Police, local councils, private utility companies and private water companies who rely on the public task basis to process personal data. This is because they are considered to be carrying out functions of public administration and they exercise special legal powers to carry out their services in the public interest.

Legitimate Interest – As a business, it is within Hazelwells legitimate interest not only to abide by its contractual and legal obligations (including vital and public interests) but to pursue the growth and sustainability of our business and relationships with all clients and contacts. It is in this regard that we may contact you in relation to any previous transaction or communication to offer our services, using personal data which you may have previously provided, wherever reasonable. We will pursue our commercial interest with minimal privacy impact and without overwhelming the data subject's interests or causing intrusive/unwarranted harm.

Controlling your personal information - We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. If you have any queries in relation to this policy or you would like a copy of the information or wish to update the personal data we hold on you then you must contact us by email at [dpo@hazelwells.com](mailto:dpo@hazelwells.com) or by writing to the Data Protection Officer, Hazelwells, 32 Winckley Square, Preston, Lancashire PR1 3JJ. If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible at the above address. We will promptly correct any information found to be incorrect. You may choose to restrict the collection or use of your personal information for marketing purposes: if you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used for direct marketing purposes. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by clicking unsubscribe link in any marketing email or by writing to us by email at [unsubscribe@hazelwells.com](mailto:unsubscribe@hazelwells.com)

Data Retention Policy – We will maintain a record of your personal data following your use of our services for a minimum period of seven years in order to meet our legal, regulatory and accounting obligations. If we are required for any reason to hold your data for any longer then we will only do so in our legitimate interest, however we will consider any potential security risks to data when making such a decision in order to ensure the safeguarding of the personal data.

Transfer of Data – We will not transfer your data outside of the EEA, except to another third country offering the same level of protection. We may choose to sell, transfer or merge parts of our business or acquire other assets. If such a change happens with our business, these terms will still apply and the new entity will control/process your data as outlined in this privacy notice.

Legal Rights – Under current EU and UK law you have the right to protection of your personal data. This includes the following rights: the right to be informed, the right of access, the right to rectification, the right to erasure, the right to restrict processing, the right to data portability, the right to object and, finally, rights in relation to automated decision making and profiling. Your statutory rights are not affected. The rights listed above may only apply in certain circumstances and if we are otherwise compelled to retain and process your data we may not always be in a position to comply with your specific request. We will endeavor to respond to your subject access request within one month of receipt, but this may take longer if your request is detailed or complex in nature or if you have made a number of similar requests. You will not have to pay a fee in order to exercise these rights, however where any requests are deemed to be unfounded, repetitive or excessive we may refuse to comply with your request. If you are not satisfied with how we have handled a subject access request then you must in the first instance contact The Data Protection Officer by emailing [dpo@hazelwells.com](mailto:dpo@hazelwells.com) or writing to Data Protection Officer, Hazelwells, 32 Winckley Square, Preston, Lancashire PR1 3JJ. If you remain unsatisfied, you can raise a complaint with the Information Commissioner's Office or with the Property Ombudsman Service, of which we are registered members. They will advise you that you must have exhausted our internal processes before they will accept an official complaint. This is the same for all formal complaints, not just those related to privacy.