Privacy & Cookie Policy for Lola May Ltd (trading as Prime Coastal Property)

Our contact details

Name: Lola May Ltd (trading as Prime Coastal Property)

Registered Office: 71-75 Shelton Street, Covent Garden, London WC2H 9JQ

Phone Number: 01202 985344

E-mail: info@primecoastalproperty.co.uk

The type of personal information we collect

We currently collect and process the following information:

- personal identifiers, contacts and characteristics (for example, name and contact details, financial information and information about your family members).
- in most cases, your personal data will have been provided to us by you. However, with your consent, or if it is necessary in order to provide you with our services, we may have obtained your personal data from a third party source.

The bases on which we process information about you

The law requires us to determine under which of six defined grounds we process different categories of your personal information, and to notify you of the basis for each category. If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

Information we process because we have a contractual obligation with you

When a contract is formed between you and us, in order to carry out our obligations under that contract we must process personal information.

As examples, a contract between us could be formed by:

- you signing an agreement to allow us to act as agent for you
- you signing an agreement to allow us to carry out services required in order to let or buy a property
- your agreement to our terms and conditions when you register on our website

We use your information in order to provide you with our services under that contract, for example:

- to help you find properties or prospective buyers
- to verify your identity for security purposes
- to carry out credit checks and to obtain personal references
- to provide other parties with whom you have expressed interest to contract and their representatives with sufficient information to make a decision as to whether to enter into a contract with you, and then to enter a contract with you
- to negotiate on your behalf
- to provide you with advice

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

Information we process with your consent

Only when you have given us explicit permission to do so, we process your personal information under the basis of consent.

For example, you might have agreed that we may track your actions on our website or pass your name and contact information to selected associates whom we consider may provide services or products you would find useful. We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by telling us.

Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest in doing so, either to you or to us.

Where we process information on this basis, we do so after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business
- responding to communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

Information we process because we have a legal obligation

Sometimes we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

Specific uses of information you provide to us

Communicating with you

When you contact us, whether by telephone, through our website or by email, we collect the data you have given us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and e-mail address so as to be able to track our communications with you to provide a high-quality service.

Dealing with complaints

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

If the complaint relates to information on our website and we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

We may compile statistics from information relating to complaints to assess the level of service we provide, but not in a way that could identify you or any other person.

Customer relationship management system

We use a customer relationship management (CRM) system to process personal data.

Data subjects include existing, former and prospective clients and their agents and representatives.

Personal data that we process includes the name of the person, the persons address details, and contact information.

We process this data on the basis of consent for purposes that include:

- managing and developing our business or services
- informing clients and prospective clients about our services
- determining relationships between clients and our partners and employees
- carrying out property viewings and meetings
- analysing whether we provide clients with a high level of service

We do not sell or share any personal data with third parties unless we have explicit consent to do so from the data subject.

Use of information we collect through automated systems when you visit our website

Cookies

Cookies are small text files that are placed on your device by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience, and the website owner with statistics about the actions you have taken.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It should also allow you to prevent or limit their use.

Our website uses cookies. They are placed there by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose. If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to provide a consistent personalised experience across our site
- to record your answers to surveys and questionnaires on our site while you complete them
- to record the conversation thread during a live chat with our support team

Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information that could identify your location, such as your IP address. We also record information reported by the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website. However, our policy is not to use such data for the purpose of personal identification.

Disclosure and sharing of your information

Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is

indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

Our websites are hosted in the United Kingdom

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly data obtained within the UK or any other country could be processed outside the European Union.

We use the following safeguards with respect to data transferred outside the European Union:

- we comply with a code of conduct approved by the supervisory authority in the United Kingdom.
- we are certified under an approved certification mechanism as provided for in the Act.
- at any time you may review or update personally identifiable information that we hold about you.
- to obtain a copy of the information we hold about you, please contact us.
- after receiving the request, we will tell you when we expect to provide you with the information.

Removal of information

If you wish us to remove personally identifiable information from our website, you should contact us.

This may limit the service we can provide to you.

Verification of your identity

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your

identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested
- to comply with other law, including for the period demanded by our tax authorities
- to support a claim or defence in court
- if you our not happy with our privacy policy or if you have any complaint then you should tell us
- if a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

ICO website: <u>https://www.ico.org.uk</u>

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us if you wish to make a request.