

PRIVACY NOTICE

Eyre & Johnson Limited trading as E&J Estates. Penult Capital Partners Limited (“We”) are committed to protecting and respecting your privacy.

This notice 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 www.eandjestates.co.uk you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the "**Act**"), the data controller is Eyre & Johnson Limited and Penult Capital Partners Limited of Prospect Place, Moorside Road, Winchester, Hampshire, SO23 7RX.

With effect from 25 May 2018, the General Data Protection Regulation (“GDPR”) will come into force, which will change the law. We collect, use and are responsible for certain personal information about individuals under this regulation.

Information we collect on you

We will collect and process the following data about you:

- Information you give us or our agents. This is information about you that you give us or our agents by filling in forms on our site www.eandjestates.co.uk ("**our site**") or by corresponding with us by phone, e-mail or otherwise. The information you give us will include your name, address, e-mail address and phone number, financial and credit card information.
- Information we collect about you.
 - information regarding the ownership of your property and your contact details from public sources such as HM Land Registry, electoral registers or other publicly available registers;
 - 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;
 - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products 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), methods used to browse away from the page, and any phone number used to call our customer service number.
- Information we receive from other sources.
 - This is information we receive about you from your landlord or from your representatives such as your estate agent or solicitor during your purchase of the lease of the property. In this case, we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected by us. We will also have told you for what purpose we will share and combine your data.

- We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.
- Information we receive about you from other entities associated with the management of the lease of your property such as the property management company or freeholder. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

Information we collect about you can be stored in hard copy and on our secure servers.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Uses made of the information

We use information held about you in the following ways:

- Information you give to us. We will use this information:
 - to carry out our obligations in relation to the collection of ground rent and other amounts and any other obligations arising from any contracts entered into between us or for your benefit;
 - to provide you with the information, products and services that you request from us;
 - to provide you with information about our services we or our partners offer that are similar to those that you have already purchased or enquired about or relate to your property and the services available at your property;
 - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. Where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data;
 - to notify you about changes to our service and/or our obligations;
 - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- Information we collect about you. We will use this information:
 - to carry out obligations in relation to the collection of ground rent and other amounts and any other obligations arising from contracts entered into between you and us;
 - to carry out obligations of your landlord in relation to your property;
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our service, when you choose to do so;

- as part of our efforts to keep our site safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising 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 will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We may retain personal information relevant to your leasehold tenancy even after you have assigned your tenancy to a new leaseholder. This is to enable legal and property management query resolution.

Disclosure of your information

We have the right to share your personal information with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Selected third parties including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
 - credit reference agencies for the purpose of assessing your credit score.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If one of our entities or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- 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 any agreements; or to protect the rights, property, or safety of E & J Estates or our landlord clients, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of managing your property, fraud protection and credit risk reduction.

The sharing of your personal data will be subject to a risk assessment prior to doing so. The data shared may include your name, address, email and phone number.

Our legal basis for processing your personal data

With regards to the holding and processes of personal data of leaseholders, freeholders or other occupiers of properties the legal basis for processing your personal data is legitimate interest in the management of the property and lease.

Specific contracts will enable us to process your data if you are a customer or supplier.

Where we store your personal data

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. 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.

We operate a clear desk policy with regards to hard copy documents, with secure filing systems and secure building access systems in place.

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.

Accuracy of data

We will check the key information we hold about you is correct on a regular basis. This will be conducted via invoicing and other communications made with yourself and will include your name and address only.

If you discover that the data we hold about you is incorrect or incomplete, you have the right to have the data corrected. If you wish to have your data corrected, you should notify us immediately of the required updates to enquiries@eandjestates.co.uk, stating that you are using your right to correction.

Usually, we will comply with a request to rectify data within one month unless the request is particularly complex in which case we may write to you to inform you we require an extension to the normal timescale. The maximum extension period is two months.

Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at enquiries@eandjestates.co.uk.

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. Please check these policies before you submit any personal data to these websites.

You have the following rights which are set out further in our Policy on your rights in relation to your data, available from our website (www.eandjestates.co.uk/privacy-policy.html), or by email or post by requesting it via email from enquiries@eandjestates.co.uk or via post from E&J Estates, Prospect Place, Moorside Road, Winchester, SO23 7RX:

- Right of Access
- Right to Correction
- Right of Erasure
- Right of Restriction
- Right to Data 'Portability'
- Right to Object
- Right not to have automated decisions made about you



Access to information

You have a right, under the General Data Protection Regulation, to access the personal data we hold on you. To do so, you should make a subject access request. Your rights regarding this and details of how to do this are included in our Subject Access Request policy, available from our website (www.eandjestates.co.uk/privacy-policy.html), or by email or post by requesting it via email from enquiries@eandjestates.co.uk or via post from E&J Estates, Prospect Place, Moorside Road, Winchester, SO23 7RX.

Changes to our privacy policy

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

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to enquiries@eandjestates.co.uk.

Complaints

Should you wish to make a complaint, please request a complaints form from enquiries@eandjestates.co.uk.