



**Westbourne**

Lettings and Property Management

## Privacy Policy

### Introduction

Welcome to our privacy policy. We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how We look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how We protect you.

## 1.0 Important information and who we are

### 1.1 Purpose of this privacy policy

This privacy policy aims to give you information on how We collect and process your personal data through your use of this website.

### 1.2 Controller

This policy applies when Spring Street Management Ltd (“We”) is the controller of, and responsible for, your personal data.

Spring Street Management Limited is registered as a data controller with the Information Commissioner, registration number **ZB568842**.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us at:

Email: [contact@wb19.co.uk](mailto:contact@wb19.co.uk)

Address: 9 Spring Street London W2 3RA.

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

We keep our privacy policy under regular review. 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.

### 1.4 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 policy of every website you visit.

## 2.0 The types of data We collect about you

Personal data, or personal information, means any information which relates to you. It could simply be your name and contact details, or it could also be our opinion of you as a potential customer and how We view you in marketing terms.

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

- **Identity Data** includes first name, last name, username or similar identifier.
- **Contact Data** email address.

- **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.
- **Profile Data** how We perceive you as a potential customer based on your interactions with us.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Whilst this may be derived from your personal data, it is not considered personal data in law as this data will **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.

## 2.1 Special categories of personal data

Special Categories of Personal Data 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.

In very limited circumstances, we may collect Special Categories of Personal Data about you. This will only be in situations where you have intentionally sent in this information to us. We will normally only process this information on the basis that you have provided explicit consent.

We do not intentionally collect any other Special Categories of Personal Data about you, nor do we collect any information about criminal convictions and offences unless We are obliged to by law e.g. anti-money laundering (AML).

## Children

We do not target our website at children (i.e. individuals aged under 18).

## 2.2 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. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

## 3.0 How your personal data is collected and our partners

We use different methods to collect data from and about you, depending on how you interact with us and our website.

### 3.1 Using our website

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and similar technologies. Please see our [Cookie Policy](#) for further details.

### 3.2 Contacting us and/or registering for our marketing communications

You may give us your Identity and Contact information by filling in forms or by corresponding with us by post, phone, email or otherwise.

We will use this information for the clearly stated purpose, e.g. responding to a request for our products or services.

We will always seek your consent to use this information for the purpose of unsolicited direct marketing. All unsolicited direct marketing will provide a simple opportunity for you to change your mind and opt-out of future unsolicited marketing.

We do not sell, share or transfer any of your data without your express consent. Emails you receive from us will always be relevant and We do not allow external companies to promote products to our mailing list.

### 3.3 Other parties or publicly available sources

We may receive personal data about you from third parties and public sources. We do this to enable us to meet our legal obligations e.g. credit referencing, AML etc.

## 4.0 Disclosures of your personal data

Where we share our personal data with other organisations to fulfil our obligations, we will always ensure that those parties are contracted by us to provide specific, secure and privacy compliant data services.

We require all such parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 5.0 International transfers

Some of the parties with whom we share your personal data may be based outside the UK; in this case their processing of your personal data will involve a transfer of data outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it, by ensuring that:

- We only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data, or
- We use specific contracts, approved for use in the UK, which give personal data the same protection it has in the UK.

Please contact us if you want further information on how we transfer your personal data out of the UK.

## 6.0 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 parties who have a business need to know. When processing personal data on our behalf, they will only process your personal data on our instructions and will be 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.

## 7.0 How long we will use your personal data for

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

## 8.0 Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are summarised below.

You have the right to:

- **Request access.** 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.
- **Request correction.** 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.
- **Request erasure.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. 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.
- **Object to processing.** You may object to our processing where we are relying on a legitimate interest, and you feel the processing impacts on your fundamental rights and freedoms or where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which override your rights and freedoms.
- **Request restriction.** This enables you to ask us to suspend the processing of your personal data in the certain scenarios, such as if you want us to establish the data’s accuracy or where you have objected to our use of your data, but We need to verify whether We have overriding legitimate grounds to use it.
- **Request transfer.** We will provide to you, or another 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.
- **Right to withdraw consent.** Where we are relying on consent to process your personal data, you can withdraw this consent. 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us using the contact details above.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We suggest contacting us in the first instance to deal with your concerns, as we may be able to manage your concerns more quickly.

### **8.1 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, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **8.2 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 protect you and 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.

### **8.3 Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could 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.



## 9.0 Our legal basis for processing 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:

- Where We need the data to perform a contract we have (or are about to) enter into with you.
- 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 e.g. marketing our products and services.
- Where we need to comply with a legal obligation e.g. AML
- Where we have your consent e.g. use of electronic mail contact details for unsolicited direct marketing.

### 9.1 Purposes for which We will use your personal data

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To manage our relationship with you, which will include responding to your queries, getting feedback from you.	Identity, Contact, Profile, Usage and Marketing and Communications.	(a) To perform of a contract with you, or (b) because it is necessary to comply with a legal obligation, or (c) because it is necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).
To enable you to enter in a prize draw, competition or complete a survey.	Identity, Contact, Profile, Usage and Marketing and Communications.	(a) To perform of a contract with you, or (b) because it is necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Identity, Contact and Technical.	(a) It is necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise), or (b) It is necessary to comply with a legal obligation.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	Technical and Usage	(a) It is necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform

To make suggestions and recommendations to you about our related products or services that may be of interest to you.	Identity, Contact, Technical, Usage, Profile and Marketing and Communications.	our marketing strategy). (a) It is necessary for our legitimate interests (to develop our products/services and grow our business).
To meet our legal obligations, including but not limited to the prevention of crime and tax fraud.	Identity and Contact.	(a) It is necessary to comply with a legal obligation

## 9.2 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 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.

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