

## Privacy Notice

This is the privacy notice of Intouch Property Investing Limited, registered company number 13421079. ('we', 'our', or 'us').

You can write to us in relation to our privacy policy at Ground Floor, The Custom House, The Strand, Barnstaple, Devon, England, EX31 1EU.

### Introduction

This notice describes how we collect, store, transfer and use personal data. It tells you about your privacy rights and how the law protects you.

In the context of the law and this notice, 'personal data' is information that clearly identifies you as an individual or which could be used to identify you if combined with other information. Acting in any way on personal data is referred to as 'processing'.

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

### Personal data we process

#### 1. How we obtain personal data

The information we process about you includes information:

- you have directly provided to us
- as a result of monitoring how you use our website or our services

#### 2. Types of personal data you provide directly to us

When you use our website or our services we may ask you to provide personal data to us. This can be categorised into the following groups:

- personal identifiers, such as your first and last names
- contact information, such as your email address, your telephone number and your postal address
- transaction information, which may include information about your payment method and/or the transactions you have made with us
- health information, which may include information about current and past medical conditions, medical treatments, injuries, and physical fitness and training
- your preferences to receive marketing from us; how you wish to communicate with us; and responses and actions in relation to your use of our services.

### **3. Types of personal data we collect from your use of our services**

By using our website we process:

- technical information about the hardware and the software you use to access our website including your Internet Protocol (IP) address, your browser type and version and your device's operating system
- usage information, including the frequency you visit our website, the pages of our website that you visit, whether you receive messages from us and whether you reply to those messages

### **4. Our use of aggregated information**

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is that which does not identify you as an individual. Aggregated information may be derived from your personal data but is not considered as such in law because it does not reveal your identity.

For example, we may aggregate usage information to assess whether a feature of our website is useful.

However, if we combine or connect aggregated information with your personal data so that it can identify you in any way, we treat the combined information as personal data, and it will be used in accordance with this privacy notice.

### **5. Special personal data**

Special personal data is data 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.

Because of the nature of our business, we may collect special personal data about you if there is a lawful basis on which to do so.

### **6. If you do not provide personal data we need**

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 that contract.

## **The bases on which we process information about you**

The law requires us to determine under which of six defined bases we process different categories of your personal data, and to notify you of the basis for each category.

If a basis on which we process your personal data 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.

## **7. Information we process because we have a contractual obligation with you**

In order to carry out our obligations under a contract between us we must process the information you give us. Some of this information may be personal data.

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.

## **8. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website, you provide your consent to us to process information that may be personal data.

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 instructing us. However, if you do so, you may not be able to use our website or our services further.

We aim to obtain and keep your consent to process your information. However, while we take your consent into account in decisions about whether or not to process your personal data, the withdrawal of your consent does not necessarily prevent us from continuing to process it. The law may allow us to continue to process your personal data, provided that there is another basis on which we may do so. For example, we may have a legal obligation to do so.

## **9. Information we process for the purposes of legitimate interests**

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

Where we process your information on this basis, we do 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, in the round, consider it reasonable to do so

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

- improving our services
- record-keeping for the proper and necessary administration of our business

- responding to unsolicited communication from you to which we believe you would expect a response
- exercising our legal rights, including to detect and prevent fraud and to protect our intellectual property
- 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

## **10. Information we process because we have a legal obligation**

Sometimes, we must process your personal data 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 court order.

This may include your personal data.

## **Use of information**

### **11. Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website that uses them. They allow information gathered on one web page to be stored until it is needed for use at a later date.

They are commonly used to provide you with a personalised experience while you browse a website, for example, allowing your preferences to be remembered.

They can also provide core functionality such as security, network management, and accessibility; record how you interact with the website so that the owner can understand how to improve the experience of other visitors; and serve you advertisements that are relevant to your browsing history.

Some cookies may last for a defined period of time, such as one visit (known as a session), one day or until you close your browser. Others last indefinitely until you delete them.

Your web browser should allow you to delete any cookie you choose. It should also allow you to prevent or limit their use. Your web browser may support a plug-in or add-on that helps you manage which cookies you wish to allow to operate.

The law requires you to give explicit consent for use of any cookies that are not strictly necessary for the operation of a website.

We use cookies to track how you use our website and to record whether you have seen specific messages we display.

## **12. 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 such as your geographical location, your Internet service provider and your IP address. We also record information about 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.

## **Other matters**

### **13. Your rights**

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data.

We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

### **14. Use of our services by children**

Some of our clients or prospective clients may be under the age of 18.

We collect data about all users of and visitors to these areas regardless of age, and we anticipate that some of those users and visitors will be children.

### **15. Data may be processed outside the UK**

Our websites are hosted in the United Kingdom.

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

For example, we may use services provided by Google, whose servers may be located in the United States of America.

Accordingly data obtained within the UK could be processed outside the UK.

If data may be transferred outside the UK, we ensure that the organisation that processes the data applies safeguards to the processing, and in particular, that the contracts between us and them require them to do so to the same standards as UK law requires.

## **16. Control over your own information**

It is important that the personal data we hold about you is accurate and up to date. Please inform us if your personal data changes.

At any time, you may contact us to request that we provide you with the personal data we hold about you.

When we receive any request to access, edit or delete personal data we first take reasonable steps to verify your identity before taking any action. This is important to safeguard your information.

Please be aware that we are not obliged by law to provide you with all personal data we hold about you, and that if we do provide you with information, the law allows us to charge for such provision if doing so incurs costs for us. After receiving your request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

We remind you that we are not obliged by law to delete your personal data or to stop processing it simply because you do not consent to us doing so. While having your consent is an important consideration as to whether to process it, if there is another legitimate basis on which we may process it, we may do so on that basis.

## **17. Communicating with us**

When you contact us, whether by telephone, through our website or by email, we collect the data you have given to 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 may keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

## **18. Complaining**

If you are not happy with our privacy policy, or if you have any complaint, then you should tell us.

When we receive a complaint, we record the information you have given to us on the basis of consent. We use that information to resolve your complaint.

If your complaint reasonably requires us to notify 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 whether we do give information, and if we do, what that information is.

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.

If you are in any way dissatisfied about how we process your personal data, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

## **19. Retention period**

Except as otherwise mentioned in this privacy notice, we keep your personal data 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

## **20. Compliance with the law**

Our privacy policy complies with the law in the United Kingdom, specifically with the Data Protection Act 2018 (the 'Act') accordingly incorporating the EU General Data Protection Regulation ('GDPR') and the Privacy and Electronic Communications Regulations ('PECR').

## **21. Review of this privacy policy**

We shall update this privacy notice from time to time as necessary.