

PRIVACY POLICY

Background

Prime Land Property Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.primelandproperty.co.uk (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site and You will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

Account

Means an account required to access and/or use certain areas and features of Our Site.

Cookie

Means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below.

Cookie Law

Means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Personal Data

means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998 and the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”).

We/Us/Our

Means Prime Land Property limited 06308273 and registered address at Sagacity Sagacity, 20 High Street, London, E15 2PP with our trading address at 124 whitechapel Road, London, E1 1JE

2. Information about Us

2.1 Our Site is owned and operated by Prime Land Property, a limited company registered in England under company number 06308273 and registered address at Sagacity Sagacity, 20 High Street, London, E15 2PP with our trading address at 124 whitechapel Road, London, E1 1JE

2.2 Our Data Protection Officer is Mr Charles Pearse, and can be contacted by email at charles@primelandproperty.co.uk, by telephone on (0)207 377 5445, or by post at 124 Whitechapel Road, London, E1 1JE.

3. What does this policy cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- 4.1.1 The right to be informed about Our collection and use of personal data;
- 4.1.2 The right of access to the personal data We hold about you (see section 12);
- 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
- 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
- 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
- 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- 4.1.7 The right to object to Us using your personal data for particular purposes; and
- 4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Data do We collect?

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies:

- 5.1 name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 business/company name
- 5.5 job title;
- 5.6 profession;
- 5.7 contact information such as email addresses and telephone numbers;
- 5.8 demographic information such as post code, preferences, and interests;
- 5.9 financial information such as credit / debit card numbers;
- 5.10 IP address;
- 5.11 web browser type and version; and
- 5.12 operating system.

6. How do We use your data?

6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.

6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- 6.2.1 Providing and managing your Account;
- 6.2.2 Providing and managing your access to Our Site;
- 6.2.3 Personalising and tailoring your experience on Our Site;
- 6.2.4 Supplying Our services to you of facilitating the tenancy process (please note that We require your personal data in order to enter into a contract with you);
- 6.2.5 Personalising and tailoring Our services for you;
- 6.2.6 Replying to emails from you;
- 6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking on unsubscribe at the footer of the email)
- 6.2.8 Market research; and
- 6.2.9 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience.

6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email and/or telephone with information, news and offers on Our products and/or services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

6.4 Third parties (including Xero, QuickBooks, Zapier, Advance Rent, Infuma, Signable) whose content appears on Our Site may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that

We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

6.6.1 the Company shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.

6.6.2 Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below.

6.6.3 When establishing and/or reviewing retention periods, the following shall be taken into account:

- (a) The objectives and requirements of the Company;
- (b) The type of personal data in question;
- (c) The purpose(s) for which the data in question is collected, held, and processed;
- (d) The Company's legal basis for collecting, holding, and processing that data; and
- (e) The category or categories of data subject to whom the data relates.

6.6.4 If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.

6.6.5 Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by a data subject or otherwise).

6.6.6 In limited circumstances, it may also be necessary to retain personal data for longer periods where such retention is for archiving purposes that are in the public interest, for scientific or historical research purposes, or for statistical purposes. All such retention will be subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects, as required by the GDPR.

7. How and where do We store your data?

7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.

7.2 Some or all of your data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting

information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under GDPR including:

7.2.1 Ensuring that appropriate technical and organisational measures are in place for treating the data safely and securely;

7.2.2 Obtaining the explicit and informed consent of the data subject to any data transfer; and

7.2.3 Ensuring that any data transfer is only necessary for the performance of a contract between us and the data subject i.e. for the services to be provided and no other reason; and

7.2.4 Ensuring that any transfer is necessary for the performance of a contract made in the interests of the data subject between us and another party.

7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

7.4 Steps We take to secure and protect your data include:

Technical Data Security Measures:

7.4.1 All emails containing Personal Data must be encrypted;

7.4.2 All emails containing Personal Data must be marked 'confidential';

7.4.3 Personal Data may only be transmitted over secure networks;

7.4.4 Personal data may not be transmitted over a wireless network if there is a reasonable wired alternative;

7.4.5 Personal Data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself and associated temporary files should be deleted;

7.4.6 Where personal data is to be sent by facsimile transmission the recipient should be informed in advance and should be waiting to receive it;

7.4.7 Where Personal Data is to be transferred in hardcopy form, it should be passed directly to the recipient in accordance with this Policy;

7.4.8 All Personal Data transferred physically should be transferred in a suitable container marked "confidential";

7.4.9 No Personal Data may be shared informally and if access is required to any Personal Data, such access should be formally requested from the DPO;

7.4.10 All hardcopies of Personal Data, along with any electronic copies stored on physical media should be stored securely;

7.4.11 No Personal Data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without authorisation;

7.4.12 Personal Data must be handled with care at all times and should not be left unattended or on view;

7.4.13 Computers used to view Personal Data must always be locked before being left unattended;

7.4.14 No Personal Data should be stored on any mobile device, whether such device belongs to the Company or otherwise without the formal written approval of the DPO and then strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary;

7.4.15 No Personal Data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question

has agreed to comply fully with the Company's Data Protection Policy and the GDPR;

7.4.16 All Personal Data stored electronically should be backed up regularly with backups stored onsite. All backups should be encrypted;

7.4.17 All electronic copies of Personal Data should be stored securely using passwords and encryption;

7.4.18 All passwords used to protect Personal Data should be changed regularly and should must be secure;

7.4.19 Under no circumstances should any passwords be written down or shared. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;

7.4.20 All software should be kept up-to-date. Security-related updates should be installed as soon as reasonably possible after becoming available;

7.4.21 No software may be installed on any Company-owned computer or device without approval; and

7.4.22 Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of the DPO to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

Organisational Data Security Measures

7.4.23 The following organisational measures are in place within the Company to protect the security of personal data:

7.4.24 All employees and other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the GDPR and under the Company's GDPR Policy;

7.4.25 Only employees and other parties working on behalf of the Company that need access to, and use of, personal data in order to perform their work shall have access to personal data held by the Company;

7.4.26 All employees and other parties working on behalf of the Company handling Personal Data will be appropriately trained to do so;

7.4.27 All employees and other parties working on behalf of the Company handling Personal Data will be appropriately supervised;

7.4.28 All employees and other parties working on behalf of the Company handling Personal Data should exercise care and caution when discussing any work relating to Personal Data at all times;

7.4.29 Methods of collecting, holding, and processing Personal Data shall be regularly evaluated and reviewed;

7.4.30 The performance of those employees and other parties working on behalf of the Company handling Personal Data shall be regularly evaluated and reviewed;

7.4.31 All employees and other parties working on behalf of the Company handling Personal Data will be bound by contract to comply with the GDPR and the Company's GDPR Policy;

7.4.32 All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all relevant employees are held to the same conditions as those relevant employees of the Company arising out of the GDPR and the Company's GDPR Policy;

7.4.33 Where any agent, contractor or other party working on behalf of the Company handling Personal Data fails in their obligations under the GDPR and/ or the Company GDPR Policy, that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

8. Do We share your data?

8.1 In order to provide our integrated services to you, We may be required to share your data with the third parties listed in 6.4 of this Policy.

8.2 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

8.3 We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

8.4 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

8.5 We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:

8.5.1 Zapier

8.5.2 Mailchimp

8.5.3 Intercom

We have the same measures in place as that listed under clause 7.4 of this policy to ensure that data is kept and held securely if stored or transferred for any reason.

8.6 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. What happens if Our business changes hands?

9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

9.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

10. How can you control your data?

10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details and by managing your Account).

10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. Your right to withhold information

11.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

11.2 You may restrict Our use of Cookies. For more information, see section 13.

12. How can you access your data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at charles@primelandproperty.co.uk or using the contact details below in section 14.

13. Our use of Cookies

13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and/or services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

13.2 By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site as per the table below. For more details, please refer to section 6, above, and to section 13.6 below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

13.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law.

13.4 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. You will be given the opportunity to allow only first party Cookies and block third party Cookies.

13.5 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 13.6. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 13.10, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

13.6 The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose
sharethis.com	This is to share information across social media

and the following third party Cookies may be placed on your computer or device:

Name of Cookie	Provider
intercom.com	Intercom Inc.

sharethis.com	Share This
google.com	Google Inc.
Google Analytics Cookies	Google Inc.
CakeCookie	Arthur Online Ltd.
CAKEPHP	Arthur Online Ltd.
collapse-nav	Arthur Online Ltd.
Inspectlet	Inspectlet
LinkedIn Ads	LinkedIn

13.7 Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the products and/or services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

13.8 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.

13.9 The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	First/Third Party	Provider	Purpose
Google Analytics Cookies	Third party	Google	Used to distinguish users, throttle request rate

Google Analytics Cookies	Third party	Google	Used to distinguish users, throttle request rate
_sharethis_cookie_test_	First party	Arthur Online Ltd.	This is to share information across social media
_stid	Third party	sharethis.com	This is to share information across social media
_ga	First party	Arthur Online Ltd.	Used to distinguish users
_get	First party	Arthur Online Ltd.	Used to throttle request rate
_gid	First party	Arthur Online Ltd.	Used to distinguish users
Intercom-id-f79t340a	First party	Arthur Online Ltd.	These cookies are strictly necessary to deliver our services. Other cookies are used to enhance the performance of our Sites. However, without these cookies, certain functions of our Sites may not work as intended. Customisation cookies: These cookies collect information about how our Sites are being used to help us to customise our Sites for you.

13.10 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

13.11 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

13.12 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

14. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at charles@primelandproperty.co.uk by telephone on 44 (0)20 7 377 5445, or by post at 124 Whitechapel Road. London, E1 1JE.

Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

15. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.