

## Square Space Property Ltd Privacy Policy

This privacy policy has been compiled to better serve those who are concerned with who we are and how and why we collect, store, use and share your personal information, both online when you use our website and when you sign up as a Tenant or Landlord. This privacy policy also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint. We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation ('GDPR'), which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws

In this privacy policy, Personal information means any information relating to an identified or identifiable individual.

For full details of the GDPR, please refer to the ICO's guide to data protection [here](#):

We are Square Space Property Ltd, a company registered in England and Wales with company number 10961780. Our registered address is Collingham House, 10-12 Gladstone Road, London, England, SW19 1QT.

### PERSONAL INFORMATION WE COLLECT ABOUT YOU

- We may collect and use the following personal information about you:
- Your name and contact information, including email address and telephone number and company details, if applicable;
- Information to enable us to check and verify your identity, e.g. your date of birth;
- Your gender information;
- Location data;
- Your billing information, transaction and payment card information;
- Information to enable us to undertake credit or other financial checks on you;
- Information about how you use our website, IT, communication and other systems;
- Your responses to surveys, competitions and promotion

This personal information is required to provide letting services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing services to you.

### HOW AND WHEN DO WE COLLECT INFORMATION?

We collect most of this personal information directly from you—in person, by telephone, text or email or via our website. Online: However, we may also collect information:

- Directly from a third party, e.g.
  - Sanctions screening providers;
  - Credit reference agencies;
  - Customer due diligence providers;
- From third parties with your consent (e.g. bank or building societies, personal and landlord references, Rightmove and Zoopla)
- From cookies on our website—for more information on our use of cookies, please see below ("Do we use Cookies")

### HOW AND WHY WE USE YOUR PERSONAL INFORMATION

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;

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- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

| WHAT WE USE YOUR PERSONAL INFORMATION FOR  | OUR REASONS   |
|--|---|
| To provide services to you   | For the performance of our contract with you or to take steps at your request before entering into a contract   |
| To prevent and detect fraud against you or our clients   | For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you  |
| Conducting checks to identify our customers and verify their identity<br>Screening for financial and other sanctions or embargoes<br>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business | To comply with our legal and regulatory obligations   |
| Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies  | To comply with our legal and regulatory obligations   |
| Ensuring business policies are adhered to, e.g. policies covering security and internet use  | For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you                                      |
| Operational reasons, such as improving efficiency, training and quality control  | For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price  |
| Ensuring the confidentiality of commercially sensitive information   | For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information<br>To comply with our legal and regulatory obligations              |
| Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, range of services or other efficiency measures  | For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price  |
| Preventing unauthorised access and modifications to systems  | For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you<br>To comply with our legal and regulatory obligations |
| Updating and enhancing customer records  | For the performance of our contract with you or to take steps at your request before entering into a contract<br>To comply with our legal and regulatory obligations                                  |

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**WHAT WE USE YOUR PERSONAL INFORMATION FOR**

**OUR REASONS**

|  |   |
|--|---|
|  | For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products  |
| Statutory returns  | To comply with our legal and regulatory obligations   |
| Ensuring safe working practices, staff administration and assessments  | To comply with our legal and regulatory obligations<br>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you |
| Marketing our services to:<br>—existing and former customers;<br>—third parties who have previously expressed an interest in our services;<br>—third parties with whom we have had no previous dealings. | For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers   |
| Credit reference checks via external credit reference agencies   | For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay their rent  |
| External audits and quality checks, e.g. the audit of our accounts   | For our legitimate interests so we can demonstrate we operate at the highest standards<br>To comply with our legal and regulatory obligations   |

The above table does not apply to special category personal information, which we will only process with your explicit consent.

**HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

We have appropriate security measures to prevent personal information from being accidentally lost or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

For example:

- Our website is scanned on a regular basis for security holes and known vulnerabilities to make your visit to our site as safe as possible.
- We use regular Malware Scanning along with other security measures put in place by our website provider.
- Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential.
- All transactions are processed through GoCardless and any data used on their site is covered by their individual privacy policy.

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### DO WE USE 'COOKIES'?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

We use cookies to:

- Understand and save user's preferences for future visits.
- Keep track of advertisements.
- Compile aggregate data about site traffic and site interactions to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If users disable cookies in their browser:

If you turn cookies off it will turn off some of the features of the site.

### WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share personal information with:

- Third parties we use to help deliver our service to you, e.g. payment service providers, contractors
- Other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- Third parties approved by you, e.g. social media sites you choose to link your account to or third-party payment providers;
- Credit reference agencies;
- Our insurers and brokers;
- Our banks;

We only allow our service providers to handle your personal information if we are satisfied; they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g. accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal information with any other third party.

### SOCIAL MEDIA

Our website offers you the opportunity to recommend our Website to your friends on third party social media site (for example, through 'liking' options).

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We offer this functionality to raise interest about our Website, however please be aware that when sharing information with third party social media sites, your personal information may become public. We recommend you always read the privacy notices of the third-party social media site to understand how your data is being used.

#### OVERSEAS TRANSFERS OF YOUR PERSONAL INFORMATION

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal information will involve a transfer of data outside the EEA.

Whenever we transfer your personal information out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission.

Where we use certain service providers, we may use specific contracts approved by the European Commission, which give personal information the same protection it has in Europe.

Where we use service providers based in the US, we may transfer data to them if they are part of the Privacy Shield, which requires them to provide similar protection to personal information shared between the Europe and the US.

#### HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

We will keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly;
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

#### Third-party links

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

#### YOUR RIGHTS

You have the following rights, which you can exercise free of charge:

|                 |   |
|-----------------|---|
| Access          | The right to be provided with a copy of your personal information (the right of access) |
| Rectification   | The right to require us to correct any mistakes in your personal information            |
| To be forgotten | The right to require us to delete your personal information—in certain situations       |

Restriction of processing

The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data

Data portability

The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations

To object

The right to object:  
—at any time to your personal information being processed for direct marketing (including profiling);  
—in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.

Not to be subject to automated individual decision making

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- Email, call or write to us—see below: '**Contact us**'; and
- Let us have enough information to identify you (e.g. your full name, address and customer or matter reference number);
- Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- Let us know what right you want to exercise and the information to which your request relates.

#### CONTACTING US

If there are any questions regarding this privacy policy or you wish to complain for any reason, you may contact us using the information below:

Square Space Property  
10-12 Gladstone Road  
London  
SW19 1QT

Email: [Info@squarespaceproperty.com](mailto:Info@squarespaceproperty.com)

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