

PRIVACY POLICY

HOW WE LOOK AFTER YOUR DATA

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed.

We use 'legitimate interest' as our primary basis for collecting and processing personal data. Outside of this, we use the principle of 'consent' as the lawful basis to conduct business.

The type of transaction we're helping you with (selling a home, buying a home, renting a home or letting a property) will dictate the information we'd ask for/obtain, how we'd use it and who we might share it with. At a quick glance, here's that information in a simple matrix.

GDPR AT A GLANCE PDF

The data controllers are PRIME PHENIX LTD Company number 10402997

Registered in England and Wales. G-05 Davenport House, 16 Pepper Street, London, United Kingdom, E14 9RP

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WHAT INFORMATION MAY BE COLLECTED

Our aim is to maintain your data as accurately as possible and to collect data for a specified and legitimate reason, such as providing you with property-related information or undertake business transactions for you. It may include special categories of personal data such as data about your finances, if this is necessary for the provision of our services.

You may give us information about you by filling in forms here on our website, by corresponding with us by phone, email or in person. This includes information you provide when you enquire about a property, register to be kept up to date about properties as they come onto the market, list your own property, use our live chat service or request a valuation on our site.

If you're planning to rent through us, we may need to gather personal information about your close family members and dependants who'll occupy the property with you. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us.

Our website uses cookies to distinguish you from other users of our website. It enables us to collect useful information about our website visitors to further improve the online experience we offer. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. By using our website, you are agreeing to our use of cookies.

We use the following cookies:

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website.

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

During your visits to our website we may automatically collect the following information: the public Internet protocol (IP) address used to connect your computer to the Internet, which browser type and version you've used, your time zone setting, your operating system, properties you viewed or searched for, page response times, download errors, how you found our site (such as via Facebook or searching on Google) and length of visits to certain pages.

We may receive information about you if you use other services we provide. We may also work closely with third parties (including, for example, business partners, sub-contractors analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

HOW YOUR INFORMATION IS USED

We will use the information given or obtained to carry out our obligations arising from any contracts entered into between you and us and to provide you with the services that you request from us.

Care is taken to ensure your information is used:

- + fairly, lawfully and transparently
- + only for the reasons for which it was collected
- + ensuring information collected is adequate, relevant and not excessive
- + taking care to ensure your information is accurate and up to date

The analytical information we gather about the visitors to our website helps us to improve our site to ensure it's presented in the most effective manner. It'll also allow you to participate in any interactive features of our service, should you choose to do so.

If you contact us with a view to buy a property, we'll store your property preferences and search criteria so that we may contact you with details of properties which may be of interest to you. Should you wish to view any of those properties, we'll notify the owners of your interest. We may offer you additional services which we feel are of benefit to you.

Some of these services are offered by a third party which is why we'd ask for your consent to share relevant information. These services are of relevance to those buying a home, such as our conveyancing service, mortgage services and concierge services. If you purchase your next home through us, we would ask for consent to offer updated valuations at key moving anniversary points.

If you've instructed us to sell a property for you, we'll store information about your property and provide details of your property to interested parties. We may offer you additional services which we feel are of benefit to you. Some of these services are offered by a third party which is why we'd ask for your consent to share relevant information. These services are of relevance to those selling/buying a home, such as our conveyancing service, mortgage services and concierge services. When we've sold your home, we would ask for consent to offer updated valuations on your new home at key moving anniversary points.

If you contact us with a view to rent a property, we'll store your property preferences and search criteria so that we may contact you with details of properties which may be of interest to you. Should you wish to view any of those properties, we'll notify the owners of your interest. We may offer you additional services which we feel are of benefit to you. Some of these services are offered by a third party and are of relevance to those renting a home.

All of our tenants will receive, at no extra charge, our concierge services which comprise arranging change of occupation notifications for council tax and utilities, as well as setting up optional services such as broadband, TV, phone, insurance, and/or where requested other moving-related needs such as insurance, cleaning, storage or removals. Please note that in order to arrange and confirm the scope of the Concierge Services to be provided, you will be contacted by telephone, text or email by Imagine Concierge. In the course of the provision of these services, we may also process move-to and move-from addresses, moving dates, tenancy details, council tax status, and other data required for the provision of those services (including data relating to other occupants or household members).

If you've instructed us to let a property for you, we'll store information about your property and provide details of your property to interested parties. We may offer you

additional services which we feel are of benefit to you. Some of these services are offered by a third party which is why we'd ask for your consent to share relevant information. These services are of relevance to those selling/buying a home, such as our conveyancing service, mortgage services and concierge services. When we've sold your home, we would ask for consent to offer updated valuations on your new home at key moving anniversary points.

HOW YOUR INFORMATION IS SHARED

We share information with others where there is a legal obligation for doing so, such as to fulfil our obligations in respect of prevention of money-laundering and other financial crime. There are also various situations in which we have a legitimate interest in sharing information, such as when we're selling or letting a property.

Where third parties are involved in processing your data we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will only act in accordance with our written instructions.

From time to time, testimonials, reviews and thank you cards are shared on our social media pages. No sensitive information, such as address, will ever be published in this way. Your information is never shared with third-party marketing organisations.

If you've given us consent to services offered by a third party, only relevant information would be shared.

We also share information about your use of our site with our trusted social media, advertising and analytics partners. This helps to select and serve relevant adverts to you.

Our site may, from time to time, contain links to and from the websites of our partner networks and advertisers. 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 or such third parties use of your personal data. Please check these policies before you submit any personal data to these websites.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This would be to provide the services you have requested from us, the processing of your payment details and the provision of management services. By submitting your personal data, you agree to this

transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with our privacy policy.

Where we have given you a password which enables you to access our vendor app showing you how your sale is progressing, you are responsible for keeping this password confidential. We ask you not to share this password with anyone.

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.

YOUR RIGHTS UNDER DATA PROTECTION LAW

The law provides various rights for individuals. These include the right to be informed that your data is being processed as outlined in this Privacy Notice. You also have a right of access, to have your information corrected, updated or erased, and to object to certain processing uses (such as for direct marketing).

Please inform us in writing immediately if any of the information you provided when signing up for services changes or needs updating, or if you suspect we hold out-of-date information.

If you have agreed to receive selected marketing information from us, please note you can opt out at a later date. If you no longer wish to be contacted for marketing purposes, please let us know. You can do that by calling any of our 4 branches or emailing any of our staff. On our marketing emails, there is a clear and simple to follow the unsubscribe option.

You can withdraw consent or request to be erased by emailing removeme@imagine-group.co.uk. It is a regulatory requirement for us to retain client data for specified periods. Where your information is required in connection with our legal obligations however, we must advise that you have no right to erasure.

Further information about your rights is available from the Information Commissioner's Office website at www.ico.org.uk. If you have any queries in connection with this Privacy Notice, you should first contact (+44) 020 8123 5445

CHANGES TO THIS POLICY

This privacy policy may change from time to time. The date will always be visible of when it was last updated.