PropEco Privacy policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your personal data). It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

Key terms:

Some of the key terms used in this policy are as follows:

We, us, our	Yesil Ltd t/a PropEco, a company incorporated in England and Wales with company number 13498700 and having its registered address at 9 Beaumont House, Redburn Road, Newcastle Upon Tyne, England, NE5 1NB
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership
	Genetic data
	Biometric data (where used for identification purposes)
	Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

This version of our privacy policy is primarily written for adults, including parents and guardians of child users.

This privacy policy is divided into the following sections:

- What this policy applies to
- Personal data we collect about you
- How your personal data is collected
- How and why we use your personal data
- Marketing
- Who we share your personal data with
- How long your personal data will be kept
- Transferring your personal data out of the UK
- Cookies and other tracking technologies
- Your rights

- Keeping your personal data secure
- How to complain
- Changes to this privacy policy
- How to contact us

What this policy applies to

This privacy policy relates to the use of personal data in connection with the services offered by PropEco through its website or otherwise.

Throughout our website we may link to other websites owned and operated by certain trusted third parties to make additional products and services available to you, or to enable the functionalities of certain products or services we are providing to you. Those third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third party websites, please consult their privacy policies as appropriate.

Personal data we collect about you

The personal data we collect about you depends on the particular activities carried out through our website. We will collect and use the following personal data about you:

- your name, address and contact information, including email address and telephone number and company details;
- your billing information, transaction and payment card or other payment method information;
- bank account and payment details;
- your account details, such as username and login details;
- your activities on, and use of, our website;
- information about the services we provide to you;
- your contact history, purchase history and saved items;
- information about how you use our website and technology systems; and
- collated property, location, and spatial data obtained from publicly available third party sources in both raw and processed formats.

You must provide this personal data to use our website and the services on it unless we tell you that you have a choice.

Sometimes you can choose if you want to give us your personal data and let us use it. Where that is the case we will tell you and give you the choice before you give the personal data to us. We will also tell you whether declining to share that personal data will have any effect on your use of our website or any services on it.

We collect and use this personal data for the purposes described in the section 'How and why we use your personal data' below.

How your personal data is collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you:
 - provide such information via in-site user entry forms or other communications (for example registration details and support communications);
 - Information provided by you in support of an application to work for us (for example contact information, employment history, educational history and qualifications, and CV) and other associated data collected through the various interview stages;
- indirectly, such as through your browsing activity while on our website (we will
 usually collect information indirectly using the technologies explained in the section
 on 'Cookies and other tracking technologies' below).

We also collect personal data about you from other sources as follows:

- indirectly from open licence and paid third party data sets (for example address, EPC, policy and Met Office data), this data may become personal data once it is associated with a specific user in order to present targeted and property or user specific results; and
- indirectly from third party partner organisations in order to provide targeted data products and services.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, eg:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Creating and managing your account with us	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price;
Providing products and services to you	To perform our contract with you or to take steps at your request before entering into a contract

What we use your personal data for	Our reasons
Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or us	For our legitimate interests, ie to minimise fraud that could be damaging for you and/or us
Enforcing legal rights or defend or undertake legal proceedings	Depending on the circumstances:
	—to comply with our legal and regulatory obligations
	—in other cases, for our legitimate interests, ie to protect our business, interests and rights
Customising our website and its content to your particular preferences based on a record of your	Depending on the circumstances:
selected preferences or on your use of our website	—your consent as gathered eg by the separate cookies tool on our website — see 'Cookies and other tracking technologies' below
	—where we are not required to obtain your consent and do not do so, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
	If you have provided such a consent you may withdraw it at any time by changing the consent settings on the cookies tool (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)
Monitoring and informing you of opportunities, offers and partner organization services that we	Depending on the circumstances:
believe will be of interest to you	—to comply with our legal and regulatory obligations
	—in other cases, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price

What we use your personal data for	Our reasons
Retaining and evaluating information on your recent visits to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive or to check our website is working as	Depending on the circumstances: —your consent as gathered eg through the use of cookies on our website — see 'Cookies and other tracking technologies' below
intended	—where we are not required to obtain your consent and do not do so, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
	If you have provided such a consent you may withdraw it at any time by contacting us (please see 'How to contact us' below) (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)
Communications with you not related to	Depending on the circumstances:
marketing, including about changes to our terms or policies or changes to the products and services or other important notices	—to comply with our legal and regulatory obligations
	—in other cases, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Protecting the security of systems and data used to provide the services	To comply with our legal and regulatory obligations
	We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Statistical analysis to help us understand our customer base	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Updating and enhancing customer records	Depending on the circumstances:
	—to perform our contract with you or to take steps at your request before entering into a contract
	—to comply with our legal and regulatory obligations
	—where neither of the above apply, for our legitimate interests, eg making sure that we can keep in touch with our customers about existing orders and new products

What we use your personal data for	Our reasons
Marketing our services to existing and former customers	For our legitimate interests, ie to promote our business to existing and former customers
	See 'Marketing' below for further information
To share your personal data with members of our group and third parties that will or may take	Depending on the circumstances:
control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a	—to comply with our legal and regulatory obligations
significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency	—in other cases, for our legitimate interests, ie to protect, realise or grow the value in our business and assets
In such cases information will be anonymised where possible and only shared where necessary	

How and why we use your personal data—sharing

See 'Who we share your personal data with' for further information on the steps we will take to protect your personal data where we need to share it with others.

Marketing

We will use your personal data to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in using your personal data for marketing purposes (see above 'How and why we use your personal data'). This means we do not need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by contacting us at info@propeco.io.

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it to other organisations outside of PropEco for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see 'Your rights' below.

Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our products and services to you, eg specific third party partner organizations to service requests made by you;
- members of our corporate group, including our subsidiaries and affiliates, for the purposes described in this policy;

- our service providers (including our supplier of customer relationship management software, online community management software and communications software) who help us provide our products and services to you; and
- our bank.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We or the third parties mentioned above occasionally also share personal data with:

- our and their external auditors, eg in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our
 or their professional advisers) in connection with a significant corporate transaction
 or restructuring, including a merger, acquisition, asset sale, initial public offering or
 in the event of our insolvency—usually, information will be anonymised but this may
 not always be possible. The recipient of any of your personal data will be bound by
 confidentiality obligations

Who we share your personal data with—further information

If you would like more information about who we share our data with and why, please contact us (see 'How to contact us' below).

How long your personal data will be kept

We endeavor to keep personal information only for as long as is necessary to satisfy the relevant purposes for which it is obtained. Specific examples of how long we will retain personal data are as follows:

- We will hold information required for satisfying accurate company and accounting records for a period of up to 7 years after which it will be destroyed.
- We will retain personal data necessary for us to establish, exercise or defend legal claims, for example to enforce our contracts or to defend claims from or involving you.
- Information submitted in relation to unsuccessful job applications will be deleted once the subject role has been filled.

You may request disposal of your personal data at any time. Where no request has been made to delete personal data and there are no active services we will automatically dispose of your personal data following a period of 12 months of inactivity.

Transferring your personal data out of the UK

Your information will primarily be stored and processed in the UK. Where our third party service providers store and process data outside of the UK and European Economic Area we will take steps to ensure that this is done so with appropriate safeguards to protect your personal data.

Countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the UK. In those cases we will comply with applicable UK laws designed to ensure the privacy of your personal data.

Under data protection laws, we can only transfer your personal data to a country outside the UK where:

- the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an 'adequacy regulation') further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available here.
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you, or
- a specific exception applies under relevant data protection law

Where we transfer your personal data outside the UK we do so on the basis of an adequacy regulation or (where this is not available) by entering into legally-approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on 'Changes to this privacy policy' below.

Transferring your personal data out of the UK — further information

If you would like further information about data transferred outside the UK, please contact us (see '**How to contact us**' below).

Cookies and other tracking technologies

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions.

We also use other tracking technologies on our website, such as:

- fingerprinting technologies, which provides data on a user's device, operating system, screen resolution, browser and browser version, language, and time zone; and
- clickstream tracking tags, which provide information about data about web traffic and user behavior.

Your rights

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

Access to a copy of your personal data	The right to be provided with a copy of your personal data
	A more detailed explanation of this right under UK law is available <u>here</u>

Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data
	A more detailed explanation of this right under UK law is available <u>here</u>
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
	A more detailed explanation of this right under UK law is available <u>here</u>
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, eg if you contest the accuracy of the data
	A more detailed explanation of this right under UK law is available <u>here</u>
Data portability	The right to receive the personal data 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
	A more detailed explanation of this right under UK law is available <u>here</u>
To object to use	The right to object:
	—at any time to your personal data being used for direct marketing (including profiling)
	—in certain other situations to our continued use of your personal data, eg where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
	A more detailed explanation of this right under UK law is available <u>here</u>
Not to be subject to decisions without human involvement	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
	We do not make any such decisions based on data collected by our website
	A more detailed explanation of this right under UK law is available <u>here</u>

The right to withdraw consents	If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time
	You may withdraw consents by contacting us at info@propeco.io
	Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see 'How to contact us' below).

If you would like to exercise any of those rights, please email or write to us—see below: '**How to contact us**'. When contacting us please:

- provide enough information to identify yourself (eg your full name, address and customer or matter reference number) and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it.

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.

If you want detailed information from Get Safe Online on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner in the UK by contacting the Information Commissioner. The UK's Information Commissioner may be contacted using the details at https://ico.org.uk/make-a-complaint or by telephone: 0303 123 1113.

Changes to this privacy policy

We may change this privacy policy from time to time—when we make significant changes we will take steps to inform you, for example via a prominent link to a description of those changes on our website for a reasonable period or by other means, such as email.

How to contact us

Individuals in the UK

You can contact us by post or email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details

Address: 9 Beaumont House, Redburn Road, Newcastle upon Tyne, England, NE5 1NB

Email: info@propeco.io