

PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect when you:

- place an order for services;
- communicate with us about your order, lease or purchase;
- contact us about services you are considering ordering or a lease you are contemplating entering into;
- discuss with us our development or management of properties; or
- otherwise make an enquiry.

References to **we**, **our** or **us** in this privacy notice are to Secure Management UK Limited.

Secure Management UK Limited is registered in England and Wales under company number 05277564 and our registered office is at Estate Office Stag Industrial Estate, Oxford Street, Bilston, West Midlands, WV14 7HZ.

1. PERSONAL INFORMATION

- When you interact with us, particularly when you make an enquiry, purchase services or purchase or lease a property from us, you may provide us with personal information about you, such as your name, address, gender, date of birth, telephone number, email address, job title and payment and financial information, we may also take copies of passports, driving licences, utility bills or any other identification documents as provided by you.
- We may undertake credit checks and searches.
- Depending on the nature of our interactions with you, there may be certain essential personal information that we have to collect from you so that we can provide you with the information or services that you have requested. This will vary depending on the relationship we have with you.
- We may also ask you for additional personal information which it is optional for you to provide but which will allow us to improve the service that we provide to you. For example, you may provide us with additional contact details to make it easier for us to get in touch with you, or with additional information about your circumstances and preferences to allow us to better tailor our services to you.
- We will always aim to make it clear which personal information it is necessary for you to provide and which personal information is optional. However, if you are unsure as to whether you are required to provide any particular piece of personal information please ask.

2. USES MADE OF THE INFORMATION

- We are committed to protecting your privacy, and will only use your personal information in accordance with applicable data protection legislation, including the General Data Protection Regulation and the Data Protection Act 2018.
- Specifically, we may use your personal information as follows:
 - to perform our obligations in respect our agreement with you, including:
 - fulfilling any tenancy that you have;
 - authorising payments; and
 - where we are developing or managing a property for you;
 - where you have expressly consented to us doing so, including:
 - where you make an enquiry or request any particular information, to respond to that enquiry and provide the requested information;
 - where it is necessary for compliance with legal obligations, including:
 - for record keeping and regulatory compliance purposes; and
 - for carrying out checks to prevent money laundering;
 - to assist official bodies with any investigations they are making; and
 - where we otherwise have a legitimate interest in doing so, including:

- carrying out checks to prevent fraud to protect us from dishonest activity;
- Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in paragraph 10. Please note however that the withdrawal of your consent will not affect any use of your personal information made before you withdrew your consent.
- 3. **SHARING OF YOUR PERSONAL INFORMATION WITHIN OUR GROUP**
- Our group consists of various companies. Where you provide personal information to one company within our group it may be shared with other companies within our group. This is in our legitimate interests to enable us to operate our group effectively and to enable us to provide you with an efficient service.
- 4. **OTHER CIRCUMSTANCES IN WHICH WE MAY SHARE YOUR PERSONAL INFORMATION**
- We may share your personal information:
 - with the prospective seller or buyer of any business or assets in the event that we sell or buy any business or assets;
 - when requested by the city council, police, administrators or bailiffs;
 - when we have to prove who was letting a property;
 - where there is a dispute, such as non-payment of rent or breaches of your tenancy agreement; and
 - with our professional service providers and enforcement agencies.
- We may also share your personal information with third parties if we are under a duty to share your personal information in order to comply with any legal obligation, or in order to enforce or apply such other terms as apply to our relationship, or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- We may share anonymised and aggregated information about our customers to third parties, such as advertisers, to allow them to select and send relevant adverts to our customers. We may also use such anonymised aggregate information to help advertisers reach the kind of audience they want to target.
- 5. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**
- In certain cases the sharing of your personal information to a third party as described above may involve your personal information being transferred outside of the United Kingdom. This may be to:
 - a country in the European Economic Area or that is otherwise considered to have data protection rules that are equivalent to those in the United Kingdom; or
 - a country which is not considered to have the same standards of protection for personal data as those in the United Kingdom, in which case we will take all steps required by law to ensure sufficient protections are in place to safeguard your personal information, including where appropriate putting in place contractual terms approved by the relevant regulatory authorities.
- 6. **RETENTION, UPDATING AND REMOVAL OF YOUR PERSONAL INFORMATION**
- Where you provide us with personal information we may retain this information for future use, including:
 - undertaking surveys or market research regarding your purchase or regarding your experience of dealing with us;
 - providing you with news and updates of a type you have asked to receive;
 - monitoring fraud and other illegal or unlawful activity; and
 - record keeping purposes.
- The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long term basis: for example, personal information that we need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirements.

- It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address. Alternatively, you can contact us using the details in paragraph 10.
- If you want to stop receiving any information from us, such as news and updates, please let us know by contacting us using the details in paragraph 10. It may take up to one month to unsubscribe you from marketing.
- Your decision to stop receiving information from us may result in the deletion of some of the personal information that we hold about you, but we may still retain personal information we require for other purposes, including where it is required for record keeping purposes.
- In certain circumstances you may be entitled to request the erasure of personal information that we hold about you. To make a request of this nature, please contact us, providing full details of the personal information you want to be erased and the reason(s) for your request. We will consider all requests upon receipt and confirm to you whether we are able to agree to your request.

7. SECURITY

- The protection of your personal information is very important to us and we have in place various security measures to ensure that your personal information is kept secure.
- However, you should be aware that the method you use to get in contact with us, such as email or post, may not be entirely secure and your personal information may be susceptible to being intercepted in transit. Equally, your personal information is at risk if a malicious third party gains access any other place where your personal information is stored, such as your email account.
- You should therefore take all reasonable steps to keep your personal information secure, including choosing a secure password for your email account and not disclosing your passwords to anybody else. You should use a unique password for every account.

8. ENQUIRIES, ISSUES AND COMPLAINTS

- You are entitled by law to ask for a copy of your personal information at any time. Please contact us using the details in paragraph 10.
- In the unlikely event that you have any concerns about how we use your personal information, please contact us as described in paragraph 10. This includes situations where you want to request the rectification or erasure of your personal information, restrictions to be placed around how we use your personal information, or to object to a particular use.
- If you make a complaint about our handling of your personal information, it will be dealt with by one of the Directors.
- If we are unable to resolve your complaint, you may make a complaint to the Information Commissioner's Office. Please see <https://ico.org.uk/make-a-complaint/> for more information.

9. CHANGES TO THIS PRIVACY NOTICE

- We reserve the right to alter this privacy notice at any time. Such alterations will be posted on our website at www.moneycom.biz. You can also obtain an up-to-date copy of our privacy notice by contacting us as described in paragraph 10. Should you object to any alteration, please contact us.

10. CONTACTING US

- If you need to contact us about this notice or any matters relating to the personal information we hold on you, you can write to Secure Management UK Limited, Estate Office Stag Industrial Estate, Oxford Street, Bilston, West Midlands, WV14 7HZ or email info@moneycom.biz

11. FURTHER INFORMATION

- We hope that the contents of this privacy notice address any queries that you may have about the personal information we may hold about you and what we may do with it. However, if you do have any further queries, comments or requests, please contact us as described in paragraph 10 above.
- Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/your-data-matters/>.