

# Our Privacy Policy

## 1. Key points of the privacy policy

**KiFusion Property Management Ltd** is committed to respecting and protecting your privacy. We collect personal information for a variety of reasons to provide the best service we can. This policy explains how we do this.

Just to explain briefly what this policy contains

Who we are:

**KiFusion Property Management Ltd** is registered at 1 Cambuslang Court, Cambuslang, G32 8FH. Our Company Registration Number is SC619099.

Collecting and using your personal information:

The main reason we collect personal information is to fulfil your requests from us. We also capture information when you visit our social media pages and through email apps or our website (which uses cookies and similar technologies to learn how we can offer better services for you and other customers). We aim to offer transparency around the use of your data and will only process personal data in accordance with applicable privacy laws including the General Data Protection Regulation 2018 and the Data Protection Act 2018.

### Marketing:

We rely on different legal reasons to send marketing to you depending on the circumstances. Where the law permits, we send postal and email/SMS correspondence that we consider to be a service-related communication, that will not unduly impact on your rights and that you can opt-out from by unsubscribing from email communications, by contacting us at [info@kifusionproperty.com](mailto:info@kifusionproperty.com). We take our data protection obligations seriously and where the law requires us to ask for your consent to send marketing by email/SMS, we will always do so.

### Sharing:

When, and only when you have given us permission, we may share your data with third-party vendors, service providers, contractors, or agents ('third parties') who perform services for us or on our behalf and require access to such information to do that work. They also commit to protect the data they hold, on our behalf.

### International:

We do not currently share any of your personal information outside the UK. We may need to update this Privacy Notice from time to time. The latest update will be shown on this page.

## 2. Personal information we collect about you

We receive personal information about you that you give to us, that we collect (including automatically) from your visits to our site and social media pages and that we obtain from other sources. We only collect personal information which we need and that is relevant for the purposes for which we intend to use it.

Personal information that you give to us – online, by phone, social media, and email:

We collect the following information if you choose to give it to us in connection with the services we provide to you, general enquiries, our social media pages or when exercising your legal rights,

corresponding with us by phone, email, or other means, and is provided by you entirely voluntarily. There are some circumstances where we need the information, for example, where you have placed an order with us, we need to know where to deliver your order and to be able to take payment from you. The information you provide to us is voluntary, however if you don't provide us with this information, we may be unable to provide our services to you or be unable to interact with you in the way you would expect. We collect:

#### Personal Information

- Your name, title and contact details (email address, telephone (including mobile) number, postal address)
- Any information you include in correspondence you send to us or in forms you submit to us when using our site or social media pages
- Details of the services you request from us
- Your marketing preferences
- The opinions and other information you provide when responding to customer surveys product and customer reviews
- Your identification information when exercising the rights that you have in relation to our processing of your personal information (see further 'Your rights in relation to your personal information' below)

#### Details of any transactions between you and us

- Information you give us when you contact us with a query or issue
- Your payment card details and, in relation to certain refunds, your bank account details
- Information you give to us when you contact us with a query or issue

#### Automatically Collected Information

From the site and from other sources such as payment providers and social media.

#### From the site:

- The IP address of your device and details regarding the type of device and browser software you use to access the site
- Details of your use of our site, namely, traffic data, weblogs, and statistical data, including where and when you clicked on certain parts of our site and details of the webpage from which you visited it
- The date and time you used our site
- The pages you visited on our site and how long you visited us for
- The website address from which you accessed our website
- Details regarding when and how you consented or otherwise agreed to receive marketing communications from us (including the date you did so)
- Cookie information

#### From other sources:

- From you when you contact us (info@kifusionproperty.com) to enquire about our services
- From automated technologies such as Cookies when you use our website. See our Cookie Policy

### **3. How we use your personal information**

We use your personal information for a variety of reasons. We rely on different legal grounds to process your personal information, depending on the purposes of our use and the risks to your privacy.

Where you have provided consent

Where you have given permission to use your data:

To contact you via email or SMS with marketing information about our products. For example, we rely on consent where you sign up to receive email newsletters by entering and submitting your email address. Where we send marketing information to you after presenting an opt-out option to you, we do so based on our legitimate interests, and not on the basis that we have obtained your consent.

- To contact you to reconfirm your marketing preferences from time to time
- To contact you via SMS to confirm deliveries if required
- Where it is necessary for us to comply with our legal obligations:

we will use your personal information to comply with our legal obligations such as health and safety

- To keep a record relating the exercise of any of your rights relating to our processing of your personal information
- To take any actions in relation to health and safety incidents required by law
- To handle and resolve any complaints we receive relating to the services and products we provide.

Where necessary to perform a contract with you, or take pre-contract steps you've asked for we may use and process your personal information where this is necessary to perform a contract with you, including:

- To fulfil your orders, purchases, and other transactions
- Where necessary to pursue a legitimate interest

We may use and process your personal information using techniques such as analysis, evaluation, insight, customer surveys and others where it is necessary for us to pursue our legitimate interests as a business for the following purposes:

- To promote our brand
- To send marketing information to you after presenting an opt-out option to you
- Enhance your customer experience
- To operate the administrative and technical aspects of our business efficiently and effectively
- For the prevention of fraud and other criminal activities

#### **4. Marketing communications**

We will use your personal information to send marketing information to you. You have the right to object to us sending you this information at any time. If you have requested to receive such marketing information from us by opting-in (you may withdraw your consent at any time); or In relation to marketing by post or email/SMS only, if we have obtained your contact details during you placing an order or making a sales enquiry, and you have not objected to receiving such marketing communications from us. In this case, we will only use your contact details to send you email marketing communications that are based on similar products or services that you purchased from us (you will always could opt out at any time).

The marketing we will send to you will contain information about our services and exciting offers (including discounts and other promotions).

We try to tailor any marketing material that we send to you for example by notifying you of special offers or promotions that will be of relevance to you, apply to your interests and in your location. If you do not wish to receive communications from us, please inform us by sending an email to: [info@kifusionproperty.com](mailto:info@kifusionproperty.com).

#### **5. Where we disclose your personal information to others**

We only disclose your personal information outside our business in limited circumstances. Any contractors or recipients that work for us will be obliged to follow our instructions or terms to protect your personal information. We do not sell your personal information to third parties.

We may disclose your information to our third-party service providers, agents, and subcontractors (Suppliers) for the purposes of providing services to us or directly to you on our behalf, including the operation and maintenance of our site and social media pages.

We may disclose your personal information to other third parties in the event of some or all our businesses undergoing a significant organisational change or if we had to comply with legal request.

## **6. Transfers of your personal information**

For those customers who use our services in the UK, we will transfer information to our partners to ensure your purchase is delivered successfully.

All information you provide to us is stored on our secure servers which are located within the UK. We will also ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. This is because some countries outside of the UK do not have adequate data protection laws equivalent to those in the UK.

Where they apply to our data transfer activities, we may rely on future adequacy decisions by UK Government about certain countries for data transfers to countries outside the UK.

## **7. Security and links to other websites**

We take the security of your personal information seriously and use a variety of measures based on good industry practice to keep it secure. Nonetheless, transmissions over the internet and to our site and our social media pages may not be completely secure, so please exercise caution. When accessing links to other websites, their privacy policies, not ours, will apply to your personal information.

We employ security measures to protect the personal information you provide to us, to prevent access by unauthorised persons and unlawful processing, accidental loss, destruction, and damage. We use Internet standard encryption technology ("SSL" or "Secure Socket Layer" technology) to encode personal information that you send to us when contacting us through the site. To check that you are in a secure area of the site before sending personal information to us, please check your website browser that it displays an image of a closed padlock or an unbroken key.

The transmission of information via the internet is not completely secure. Although we will do everything possible to protect your personal information, we cannot guarantee the security of any personal information during its transmission to us online. You accept the inherent security implications of using the internet and will not hold us responsible for any breach of security unless we are at fault.

We will never ask you to confirm any account or credit card details via email. If you receive an email claiming to be from KiFusion Property Management Ltd asking you to do so, please ignore it and do not respond to it.

Our site, emails and social media pages may contain links to other websites run by other organisations which we do not control. This policy does not apply to those other websites, so we encourage you to read their privacy policies. We specifically disclaim responsibility (even if you access them using a link that we provide) for their content, privacy policies and privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy,

content, or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

If you linked to our site from a third-party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the privacy policy of that third party website.

## **8. The periods for which we retain your personal information**

We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which we collected it. For certain purposes we retain your personal information (e.g., to suppress marketing messages where you have opted out), otherwise to establish, bring or defend legal claims, we only retain your personal information in accordance with our data retention policy and relevant statutory data retention periods that apply. For example:

### **Retention Periods**

We keep your personal information for no longer than necessary to fulfil the purposes for which the information is processed. We process personal information in accordance with our Data Retention Period and relevant statutory data retention period that may apply.

The only exceptions to this are where:

- The law requires us to hold your personal information for a longer period, or delete it sooner
- You exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see Your Rights in Relation to Your Personal Information below)
- We bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible
- We archive the information; in which case we will delete it in accordance with our deletion cycles which are based on good industry practice or
- You exercise your right to require us to retain your personal information for a period longer than our stated retention period (see further Your Rights in Relation To Your Personal Information below).

## **9. Your rights in relation to your personal information**

You have the following rights, some of which may only apply in certain circumstances. To exercise these rights please contact us using the details at the end of this policy. Detail of these rights are below.

### **Your Rights**

#### **Further Information**

- To have your information corrected if it is inaccurate and to have incomplete personal information completed
- The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this policy.

#### To object to processing of your personal information

- Where we rely on our legitimate interests as the lawful basis for processing your personal information for particular reasons. You may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information; we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise, we will provide you with our justification as to why we need to continue using your data.
- You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please email us at [info@kifusionproperty.com](mailto:info@kifusionproperty.com).

#### To withdraw your consent to processing your personal information

- Where we rely on your consent as the lawful basis for processing your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can also do so using by emailing us at [info@kifusionproperty.com](mailto:info@kifusionproperty.com). If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

#### To restrict processing of your personal information

- You may ask us to restrict the processing of your personal information in the following situations:
- where you believe it is unlawful for us to do so
- you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings
- In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

#### To have your personal information erased

- In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

#### To request access to your personal information and how we process it

- You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

#### To electronically move, copy or destroy your personal information in a standard, machine-readable form

- Where we rely on your consent as the lawful basis for processing your personal information or need to process it in connection with a contract in place directly with you, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used, and machine-readable form, such as a CSV file.
- You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.
- Rights relating to automated decision making, including profiling

- You may also contest a decision made about you based purely on automated processing by contacting us using the information at the bottom of this policy.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

#### **10. Use of our services by children**

Our services are not intended for use by children (individuals under the age of 18 years).

#### **11. Changes to our Privacy Policy**

Please check this page regularly for changes to this policy.

#### **12. Contact and legal information**

You can contact us with your queries in relation to this policy or for any other reason by post or email.

Please email us at [info@kifusionproperty.com](mailto:info@kifusionproperty.com)

KiFusion Property Management Ltd company registration number is SC619099 and registered office address is 1 Cambuslang Court, Cambuslang, G32 8FH.