

## Privacy Policy

We are Aspire to Move Ltd and the purpose of this privacy policy is to keep you informed of how we obtain and use your personal data when you visit our website or use our services.

Aspire to Move Ltd is committed to respecting your privacy and protecting your personal information and the purpose of this privacy policy is to keep you informed of how we obtain and use your personal data. We will explain why we are allowed to do so by law and who will have access to your data and we will explain your rights.

We will, at all times, handle your personal data in compliance of the General Data Protection Regulations (EU Regulation 2016/679) and the Data Protection Act 2018.

We are the “Data Controller” of the personal data you provide to us and we are registered with the Information Commissioners Office, registration number ZA673353

### What personal data do we collect?

Personal data is any information we collect from you which will identify you personally. We may have collected this directly, for example, by you providing us with your name or indirectly, for example, from information about your use of our services.

We may collect, use, store and transfer different types of personal data about you:

**Identity & Contact Data** : includes your full name, correspondence address, email address, telephone number, marital status, username, title, date of birth and gender

**Financial Data** : includes bank account, payment card details and salary details

**Transaction Data** : includes details relating to transactions paid for by you for other products or services purchased from us

**Technical Data** : includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website

**Usage Data** : includes details of your visits to our site and how you use our website

**Marketing & Communications Data** : includes your preferences in receiving marketing from us and our third party providers and your communication preferences

We do not collect any “special category” or “sensitive” personal data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

We do not collect data relating to criminal convictions and/or offences nor do we collect personal data relating to children.

## How do we collect your personal data?

**Directly** : You may provide us with Identity, Contact and Financial Data by corresponding with us in person, by post, telephone or email. This will include personal data you provide when you correspond:

- By requesting marketing to be sent to you
- By applying to use our services for lettings
- By contacting us through social media
- By providing us feedback
- By visiting us in the office
- By contacting us by post, telephone or email

**Indirectly** : We may receive personal data about you from various third parties and public sources:

- From payment card service providers
- From reference providers including credit referencing agencies
- From Electoral Register data, Land Registry data and Companies House data
- From property portals such as but not limited to Rightmove and On The Market
- From various third parties, including but not limited to: Solicitors, previous Landlords, Employers, Accountants, Local Authorities and Utility Suppliers

## How we will use your personal data?

We will use your personal data for the purpose for which it was collected and should we need to process your data for a different purpose, then we will inform you. We may process your data for a different purpose without your consent where it is necessary for us to comply with our legal obligations

Purpose/Activity	Type of Data	Lawful basis for processing
To communicate with you	Identity	Performance of our contract
	Contact	
	Financial	Legitimate interest
	Transaction	
	Marketing & Communications	
To carry out our contract with you	Identity	Performance of our contract
	Contact	
	Financial	Legitimate interest
	Transaction	
	Marketing & Communications	
To verify your identity	Identity	Legal obligation
	Contact	
	Financial	Legitimate interest
To issue service communications	Identity	Legitimate interest

## Contact

### Technical Usage

To issue direct marketing	Identity Contact Marketing & Communications	Consent (can unsubscribe at any time)
To permit third parties to contact	Identity Contact Marketing & Communications	Consent (can unsubscribe at you any time)  Legitimate interest
To facilitate viewings	Identity Contact	Performance of our contract Legitimate interest
To coordinate a let	Identity Contact Financial	Performance of our contract  Legitimate interest
To notify changes in our services	Identity Contact	Performance of our contract Legal obligation
To ensure our website works effectively	Identity Contact	Legitimate interest
To ensure our website is safe and secure	Identity Contact Financial	Legal obligation  Legitimate interest
To provide customer support	Identity Contact	Performance of our contract
To comply with the law and/or a court order	Identity Contact Technical Usage	Legal obligation

## Marketing

You can withdraw your consent for us to use your personal data for marketing purposes at any time and you can also withdraw consent for us to pass your personal data onto third parties for marketing purposes at any time. Should you wish to withdraw such consent, please contact us:

T : 01225 444333

E : [info@aspiretomove.co.uk](mailto:info@aspiretomove.co.uk)

## **Legal grounds for processing your personal data**

To comply with the Data Protection Act 2018 we must process your personal data using one of the following lawful basis:

### **Consent**

Where you provide us with your consent to process your personal data for a specific reason, which would be, to send you marketing communications about our products and services and/or share your personal data with agreed third party providers or conducting market research

### **Performance of our contract**

Where the processing is necessary in order for us to comply with our contractual obligations agreed with you under our terms & conditions, so for example, if you are a Landlord and you instruct us to let your property

### **Legitimate interest**

Where the processing is necessary for our legitimate interests or the legitimate interests of a third party in order for us to assist you with a service we provide, unless there is a good reason to protect your personal data which overrides those legitimate interests, so for example, if you are a Tenant renting a property

### **Legal obligation**

Where the processing of your personal data is necessary in order for us to comply with the law, so for example Money Laundering regulations and Right to Rent checks under the Immigration Act

### **Vital interests**

Where the processing is necessary to protect someone's life

### **Public task**

Where the processing is necessary for us to perform a task in the public interest

## **What are your Rights?**

You have certain rights related to your personal data which are:

**Right to be informed** – you have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and we are providing this information in this Privacy Policy

**Right of access** – you have the right to obtain access to your personal data that we are processing so that you can check that we are processing your personal data correctly

**Right to rectification** – you can request to have your personal data corrected if it is inaccurate or incomplete

**Right to erasure** – also known as the “right to be forgotten” which enables you to request the deletion or removal of your personal data, unless we must retain it by law

**Right to restrict processing** – you have the right to block or suppress your personal data so that we can no longer use it, however, we can still store the data

**Right to data portability** – you must be able to obtain and reuse your personal data in a format that is structured and readable and in certain circumstances you have the right to request to have this information passed directly to a third party

**Right to object to processing** – you have the right to object to us processing your personal data for our legitimate business interests or for direct marketing purposes

**Right to withdraw consent for processing** – you have the right to withdraw any consent previously granted at any time

**Right to make a complaint** – you have the right to complain to the Information Commissioner’s Office (ICO) if you are unhappy with how we have handled your personal data or you believe we have acted in breach of the Data Protection Act 2018

#### **How do we use cookies?**

Cookies are small text files that are placed on your computer’s hard drive through your web browser when you visit any website. They are widely used to make websites work, or work more effectively, as well as to provide information to the owners of the site.

Like all other users of cookies, we may request the return of information from your computer when your browser requests a web page from our server. Cookies enable our web server to identify you to us, and to track your actions and the pages you visit while you use our website. The cookies we use may last for a single visit to our site (they are deleted from your computer when you close your browser), or may remain on your computer until you delete them or until a defined period of time has passed.

Although your browser software enables you to disable cookies, we recommend that you allow the use of cookies in order to take advantage of the features of our website that rely on their use. If you prevent their use, you will not be able to use all functionality of our website. Here are the ways we may use cookies:

To record whether you have accepted the use of cookies on our website. This is solely to comply with the law. If you have chosen not to use cookies for your visit, unfortunately, our site will not work well for you.

To allow essential parts of our website to operate for you.

To operate our content management system

To operate the online notification form – the form that you use to contact us for any reason. This cookie is set on your arrival at our website and deleted when you close your browser.

To enhance security on our contact form. It is set for use only through the contact form. This cookie is deleted when you close your browser.

To collect information about how visitors use our website. We use the information to improve your experience of our website. This cookie collects information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from, and the pages they visited.

To record that a user has viewed a webcast. It collects information in an anonymous form. This cookie expires when you close the browser.

To record your activity during the webcast. For example, as to whether you have asked a question or provided an opinion by ticking a box. This information is retained so that we can serve your information to you when you return to the website. This cookie will record an anonymous ID for each user, but it will not use the information for any other purpose. This cookie will last for a period of time after which it will delete automatically.

To store your personal information so that you do not have to provide it afresh when you visit the website next time. This cookie will last for a period of time after which it will delete automatically.

For more information on Google Analytics privacy policy visit <http://www.google.com/analytics/learn/privacy/html>

### **Who do we share your information with?**

We may share your personal data with our third party suppliers who will provide certain business services. These third party suppliers will act as “processors” of your personal data on our behalf and we have agreements in place with our suppliers that restrict their use of your personal data. We only allow third parties to use your personal data for specified purposes and in accordance with our instructions. In addition, we may disclose your personal data if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to protect the rights, property or safety of our business, our customers or others. This includes, in specific cases, exchanging information with other organisations for the purposes of fraud protection.

### **How long do we keep your data?**

We keep your personal data for no longer than is necessary for the purposes for which it was provided. This will vary depending on the legal basis for which it was taken.

If Consent is the legal basis for the processing of your personal data, we will keep your personal data for as long as your consent is still valid. We will review the status of your consent every 12 months and should you not respond to a request for the renewal of consent, we will consider this to be your withdrawal of consent. Should we identify a legitimate interest in retaining some of your personal data that was previously provided by consent, we will inform you that we intend to keep it under this new basis.

If Legitimate interest is the basis for the processing of your personal data, we will keep your personal data for as long as the purpose for the processing remains active. We will review the status of our legitimate interest every 12 months and will update this notice should this basis no longer exist or that a new one has been found.

If Performance of our contract is the basis for the processing of your personal data, we will keep your personal data for a period of 6 years as determined by reference to the Limitations Act 1980, for the purposes of exercising or defending legal claims.

If Legal obligation is the basis of the processing of your personal data, we will keep your personal data as specified by the legislation for which it was required to obtain your personal data.

#### **How can I access my personal data?**

You can request details of the personal data we hold about you and this is called a “subject access request”. All requests should be made in writing to us and there is not normally a charge for a subject access request unless your request is manifestly unfounded or excessive, for example, if you make repetitive requests then a fee may be charged to cover our administrative costs.

We will respond to your subject access request within one month of receipt of your request, however, if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### **How to contact us**

If you wish to discuss how we have handled your personal data or you wish to complain, please contact us using the details provided in the Marketing section of this Privacy Policy.

If you are not satisfied with our response, you may escalate your complaint to the Information Commissioner’s Office (ICO), who can be contacted at:

T: 0303 123 1113

P : The Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

W : [www.ico.org.uk](http://www.ico.org.uk)

This privacy Policy was last updated in September 2022