

CORE

PRIVACY POLICY

POLICY VERSION: 2024

INTRODUCTION

<https://coreresidential.com/> (our website) is provided by Core Residential Holdings Limited (company number 15478016) whose registered office address is at 4 Lonsdale Road, London, England, NW6 6RD ('we', 'our' or 'us'). We are the controller of personal data obtained via our website, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

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) in connection with your use of our website. 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.

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).

Our Privacy Policy is primarily written for adults, including parents and guardians of child users. Given the nature of our website, we do not expect to collect the personal data of anyone under 18 years old. If you are aware that any personal data of anyone under 18 years old has been shared with our website please let us know so that we can delete that data.

THIS PRIVACY POLICY IS DIVIDED INTO THE FOLLOWING SECTIONS:

- Application of Privacy Policy
- Personal Data
- How Personal Data is Collected
- How and Why Personal Data is Used
- Marketing
- Disclosure of Personal Data
- Data Retention
- International Transfers of Personal Data
- Cookies
- Your Rights
- Security of Personal Data
- Complaints
- Changes to Privacy Policy
- Contact Details

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APPLICATION OF PRIVACY POLICY

This Privacy Policy relates to your use of our website only.

Our website may contain links to third-party websites or applications. 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

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:

- Identity Data including your name, title, date of birth or gender.
- Contact Data including your billing address, email address and telephone number.
- Financial Data including your transaction and payment card or other payment method information, bank account and payment details.
- Profile Data including your account details such as username and password, contact history, purchase history, marketing preferences and communication preferences.
- Feedback Data including information, feedback or survey responses you give to us by phone, email, post or via social media.
- Usage Data including information about your activities on, and use of, our website, competitions and technology systems.
- Technical Data including your browser type and version, time zone setting and location, operating system and other technology on the devices you use to access our website.

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 the service we can provide for you, such as your entry into our competitions.

We collect and use this personal data for the purposes described in the section 'How and Why Personal Data is Used' below.

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HOW PERSONAL DATA IS COLLECTED

We collect personal data from you:

- Directly such as the information you send us when you register with us, contact us by email, post, phone or otherwise, send us feedback, complete customer surveys or request marketing to be sent to you.
- Indirectly such as your browsing activity while on our website. For further details, please refer to our Cookie Policy here. We may also collect personal data about you from other sources as follows:
- Third parties such as technical data from payment providers, advertising networks such as Facebook, Instagram, YouTube or TikTok or analytics providers such as Google.

HOW AND WHY PERSONAL DATA IS USED

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

- 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 'Contact Details' below).

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

	WHAT WE USE YOUR PERSONAL DATA FOR	OUR REASONS
1	Creating and managing your account with us, such as your Identity Data and Contact Data.	To perform our contract with you.
2	Providing real estate products or services to you, such as your Identity Data, Contact Data and Profile Data.	To perform our contract with you. Necessary for our legitimate interests to assess how customers use our services and grow our business.
3	To process and deliver your application including managing payments and charges, such as your Financial Data, Contact Data and Identity Data.	To perform our contract with you. Necessary for our legitimate interests to recover debts due to us.
4	Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or us, such as your Identity Data, Contact Data, Profile Data and Financial Data.	To comply with our legal and regulatory obligations. For our legitimate interests to minimise fraud that could be damaging for you and/or us.

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	WHAT WE USE YOUR PERSONAL DATA FOR	OUR REASONS
5	To manage our relationship with you including notifying you about changes to our terms and conditions or asking you to leave a review to take a survey, such as your Contact Data, Profile Data and Feedback Data.	To perform our contract with you. To comply with our legal obligations. Necessary for our legitimate interests to keep our records updated.
6	Enforcing legal rights or defend or undertake legal proceedings, such as your Identity Data, Contact Data, Feedback Data and Profile Data.	To comply with our legal and regulatory obligations. Necessary for our legitimate interests to protect our business, interests and rights.
7	Customising our website and its content to your particular preferences based on a record of your selected preferences or on your use of our website, such as your Technical Data, Usage Data and Profile Data.	Necessary for our legitimate interests to inform our marketing strategy, grow our business and deliver the best service to you.
8	Statistical analysis to help us understand our customer base, such as your Technical Data, Usage Data and Profile Data.	For our legitimate interests to be as efficient as we can so we can deliver the best service to you.
9	Updating and enhancing customer records, such as your Identity Data, Contact Data and Profile Data.	To perform our contract with you. To comply with our legal and regulatory obligations. Necessary for our legitimate interests to make sure that we can keep in touch with our customers.
10	Protecting the security of systems and data used to provide the services, such as your Technical Data, Usage Data and Profile Data.	To comply with our legal and regulatory obligations. Necessary for our legitimate interests for running our business, network security and the provision of IT services and to prevent activity that could be damaging for you and/or us.
11	Marketing our services to existing and former customers, such as your Technical Data, Usage Data and Profile Data.	For our legitimate interests to promote our business to existing and former customers.

MARKETING

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

We have a legitimate interest in using your personal data for marketing purposes (see above 'How and Why Personal Data is Used'). 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@coreresidential.com,
- using the 'unsubscribe' link in emails or following the opt-out methods provided on any marketing message sent to you, or

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- updating your marketing preferences.

We may ask you to confirm or update your marketing preferences if you ask us to provide further 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 share it with other organisations 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.

DISCLOSURE OF PERSONAL DATA

We routinely share personal data with:

- Third parties we use to help deliver our services to you, e.g. payment service providers and maintenance companies.
- Other third parties we use to help us run our business, e.g. marketing agencies or website hosts and website analytics providers.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. If a change happens to our business, the new owners may use your personal data in the same way set out in this Privacy Policy.

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

- Our and their external auditors, e.g. 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.

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

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DATA RETENTION

We will not keep your personal data for longer than we need it for the purpose for which it is used. Different retention periods apply for different types of personal data. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

INTERNATIONAL TRANSFERS OF PERSONAL DATA

The EEA, UK and other countries outside the EEA and 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 and EEA 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:

- in the case of transfers subject to UK data protection law, 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,
- 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.

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 Privacy Policy' below.

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

COOKIES

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

For further information on cookies, our use of cookies, when we will request your consent before

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placing them and how to disable them, please see our Cookie Policy here (http://coreresidential.com/wp-content/uploads/2024/05/CookiesPolicy_CoreResidential_2024.pdf).

YOUR RIGHTS

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

- The right to be provided with a copy of your personal data.
- The right to require us to correct any mistakes in your personal data.
- The right to require us to delete your personal data (in certain situations).
- The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data.
- 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).
- The right to object to your personal data being used for direct marketing (including profiling), or to our continued use of your personal data.
- 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.
- 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.

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see 'Contact Details below'). You may also find it helpful to refer to the guidance from the UK's Information Commissioner for a more detailed explanation of the rights outlined above under the UK GDPR on their website <https://ico.org.uk/for-the-public/>.

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

- provide enough information to identify yourself 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.

SECURITY OF PERSONAL DATA

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.

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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 <https://www.getsafeonline.org/> . Get Safe Online is supported by HM Government and leading businesses.

COMPLAINTS

Please contact us at complaints@coreresidential.com if you have any queries or concerns about our use of your personal data (see below 'Contact Details' for additional ways to get in touch). 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. The Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

However, we would appreciate the opportunity to resolve your complaint before you approach the Information Commissioner, so please contact us in the first instance.

CHANGES TO PRIVACY POLICY

We keep our Privacy Policy under regular review and may change this Privacy Policy from time to time. When we make significant changes, we will take steps to inform you. Please keep us informed if your personal data changes during your relationship with us.

CONTACT DETAILS

You can contact us by post, email or telephone 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:

Company: Core Residential Agency Ltd

Data privacy manager: Chris Casey-Kon

Email address: info@coreresidential.com

Postal address: 4 Lonsdale Road, Queens Park, London, NW6 6RD

Contact number: 020 7523 5022