



## Privacy Statement

### Introduction

APML Estate Limited is committed to keeping the information you provide to us in a secure manner. This Privacy Statement is intended to inform you on how we gather, store and utilise your information. This Privacy Statement has been developed in accordance with the requirements of the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (“**UK GDPR**”) and the Data Protection Act 2018 and is effective as of 1 January 2021. This policy may change from time to time, and we will advise you of any material changes by email where we hold your email address.

By using the APML Estate website or otherwise providing your personal information to us, you agree to the collection, use and sharing of your information in accordance with this Privacy Statement. Personal information is information, or any combination of separate pieces of information, that could be used to identify you.

### Ways in which we collect your data

There are a number of ways that APML Estate Limited collects data:

- When you contact us and provide information to us directly
- When you enter into a contract in respect of property that we manage
- When you use our website
- When you visit any of our properties and your image is recorded by our CCTV system
- Where we can collect information ourselves from publicly available sources, such as social media platforms or the Land Registry
- Where you are introduced to us by a referral or letting agent, and the agent transfers your personal information to us
- Where references are provided to us on your behalf by a third party, such as a previous landlord.

### How we use your data

We use the information we collect to conduct our business operations. The following are examples of how we may use the information we collect:

- To answer your questions or respond to your requests
- To create and manage your account
- To process payments
- To protect against or identify possible fraudulent transactions
- To ensure the security of properties under our management
- To provide you with recommendations for third party property maintenance providers where you have told us this is something you require
- To comply with our legal and regulatory obligations

### 3<sup>rd</sup> Party Service Providers

We engage 3<sup>rd</sup> party service providers to perform a variety of business operations on our behalf. In so doing, we may need to share your personal information with them. We provide our service providers with only the personal information they need in order to perform the services we request. We contractually require that they protect this information in accordance with this privacy policy and data protection legislation and must not use it for any other purpose. For example, we may rely on a 3<sup>rd</sup> party service provider to:

- Fulfil your service requests and answer your questions
- Register deposits under the tenancy deposit scheme
- Perform property management services on our behalf

### Legal basis under which we use your data

Depending on the purpose for which we collected your personal information, we will use it under one of the following legal bases:

- To enter into and/or perform a contractual relationship with you
- To comply with our legal obligations
- For the purposes of our legitimate business interests, except where these are overridden by your interests or fundamental rights and freedoms

### Cookies

Our website employs cookies, or small files of letters and numbers stored in the memory of your computer or mobile device. These are used to facilitate users' browsing experience and allow us to tailor the information displayed so it's as relevant as possible. A notice will display the first time you visit our website advising you of our cookie policy and inviting you to accept or reject their use. There are several types of cookies:

- **Essential:** cookies that are a basic requirement to allow our website to load properly; without these the website and booking engine cannot function.
- **Functional:** cookies that aren't essential but make for a better user experience when navigating our site.
- **Optional:** cookies that do not impact our site's performance but allow us to collect statistics on where our traffic is coming from and to display offers and content we think might be of interest to you. These can also be used to show you online ads on 3rd party sites following your visit to our site.

More detailed information about cookies, their use, and how to modify your settings to remove them can be found on the UK's Information Commissioner's Office: <https://ico.org.uk/global/cookies>

### Our commitment to your privacy

The information you have provided to us will solely be used for the purposes outlined above, will be stored securely, and will never be shared with third parties unless this is required in order to perform a service you have requested or as required by law. At no time will your information be shared with any third party for their own marketing purposes.

The personal information we collect is primarily stored in the UK. If we transfer your personal information outside the UK, we will ensure that the information is transferred to countries that are recognised as offering an equivalent level of protection or we will put in place appropriate safeguards such as standard contractual clauses.

### Your rights

To the extent provided by law, you may at any time request details of any personal information we have on file for you by contacting us by telephone on 020 7341 7010.

You have the right to request rectification of your personal data, to restrict the processing of personal data, to move or copy the personal data we have on file for you and to object to the processing of personal data. You also have the right to request that your data be deleted from our systems using the same contact details listed above.

Before acting on such a request we will take reasonable steps to verify your identity to prevent anyone from requesting action that you have not authorised.

In addition to the individual rights above, if you are unhappy with the way in which APML Estate uses and processes your personal data, you can complain to the UK's Information Commissioner's Office (ICO). The ICO can be contacted on 0303 123 1113 or you can contact them by referring to their website at <https://ico.org.uk>.

### **Retention Period**

We will retain your personal information for as long as is necessary to fulfil the purposes for which we collected it, unless otherwise required by law.

### **Links to third-party sites**

Our website may contain links enabling you to visit other websites. If you visit another organisation's website via such links, you should be aware that we do not control that website. Accordingly, APML Estate Limited cannot be responsible for the protection and privacy of any information which you may provide while visiting such websites.

### **Data Protection Registration**

APML Estate Limited is registered as a data controller with the UK Information Commissioner's Office. Our data protection registration number is: Z650898X