

Fair Processing Notice for 'PinnPoint' Website

1. What is this document and why should you read it?

This privacy notice explains how and why Annington Rentals (No. 5) Limited (also referred to as "**Annington**", "**we**", "**our**" and "**us**") uses personal data about prospective and actual tenants of its properties, their representatives, users of our website PinnPointUxbridge.co.uk (the "**Website**"), visitors, enquirers and key contacts at our suppliers, commercial partners and corporate customers (together, "**you**").

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

2. Annington's data protection responsibilities

"**Personal data**" is any information that relates to an identifiable natural person. Your name, address and contact details are all examples of your personal data, if they identify you.

The term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

Annington is a so-called "**controller**" of your personal data. This means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

3. What types of personal data do we collect and where do we get it from?

You will fall into one of the following categories of individuals, about whom we process personal data:

- (a) users of our Website ("**Website Users**");
- (b) potential individual tenants of our properties who have registered an interest in one of our properties or requested details about one or more of our properties ("**Interested Parties**");
- (c) actual tenants;
- (d) other occupiers of those properties, such as your family members, or individuals controlling access to the property for you, such as a neighbour key holder ("**Occupiers**");

- (e) representatives and professional advisers acting for you ("**Representatives**");
- (f) keys individual contacts at our suppliers, commercial partners and corporate customers ("**Key Contacts**"); or
- (g) other individuals that otherwise communicate or engage with us ("**Contacts**").

Accordingly, we collect and process different types of personal data about you whether you are an Interested Party, Key Contact, Applicant or Occupier, when you visit our Website, or where you otherwise communicate or engage with us. We also obtain some personal data from other sources, and create some personal data ourselves.

It is your responsibility to make sure the personal data you provide to us is complete and accurate and you must help us to keep it accurate and up to date. If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting info@pinpointuxbridge.co.uk.

We collect your personal information from various sources. The table below sets out the different types of personal information that we collect and the sources we collect it from.

Category	Type of personal data	Collected from
<i>Interested Party & Tenant Information</i>	<ul style="list-style-type: none"> • Name and Title • Address, Telephone and Email address • Responses to surveys • Monthly budget (if provided) • Bedroom & furnishing requirements (if provided) • Right to Rent checks 	<ul style="list-style-type: none"> • You • Your agent, representative, professional advisers, credit check agency • Your partner or spouse or any other person you are renting with
<i>Key/other Contact Information (Key and other Contacts)</i>	<ul style="list-style-type: none"> • Your employer, or organisation your place of work and job title • Business Address • Business Telephone and/or fax number 	<ul style="list-style-type: none"> • You • Your employer / organisation

	<ul style="list-style-type: none"> • Business Email address • Your contact/marketing preferences 	
Key Contact Information	<ul style="list-style-type: none"> • Payment information • Banking details • Your attendance at events arranged by or on behalf of us, and other events which we notify you of (“Events”) • Communications we may have with you, whether relating to an Event or not • Any additional information that you provide to us voluntarily, including (for example) requirements for attendance at Events (please also see Sensitive Information below) • Responses to surveys in relation to Events and/or us 	<ul style="list-style-type: none"> • You • Your employer or organisation
Website Information (Website Users)	<ul style="list-style-type: none"> • IP address and other online identifiers / web beacons • User names, passwords and other log-in information (as applicable) • Details of your online browsing activities on our website, such as the pages or areas of our website that you visit • Your account settings including any default preferences and any preferences we have observed. 	<ul style="list-style-type: none"> • You • Device used to access the Website • Our Website (including any cookies)
Occupier Information (Occupiers)	<ul style="list-style-type: none"> • Name and Title • Address, Telephone and Email address • Availability 	<ul style="list-style-type: none"> • You • The tenant of the property • The agent or representative acting for the or tenant of the property
Sensitive	<ul style="list-style-type: none"> • Any special requirements for access to or to occupy one of 	<ul style="list-style-type: none"> • You

Information	<p>our properties</p> <ul style="list-style-type: none"> Any special requirements for attendance at Events, including dietary or accessibility requirements 	<ul style="list-style-type: none"> Your spouse or partner or other person with whom you rent our property Your agent, representative or professional advisers
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4. What do we do with your personal data and why?

We process your personal data for particular purposes in connection with your relationship with us, use of our Website, attendance at Events, your communication or other engagement with us and the management and administration of our business.

We are required by law to always have a so-called “lawful basis” (i.e. a reason or justification) for processing your personal data. The table below sets out the purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

Please note that where we have indicated below that our processing of your personal data is either:

- (a) necessary for us to comply with a legal obligation; or
- (b) necessary for us to take steps, at your request, to potentially enter into a contract with you, or to perform it,

and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract or engagement with you.

		Lawful basis			
Purposes of processing		Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
Communications with you					
a)	Responding to your requests, enquiries and/or customer complaints, including sending you details of properties you have requested		✓	✓ (where mandatory for us to do so by law)	✓ (to respond to you in relation to such matters)
b)	Confirming and processing property purchases, leases or other orders for goods or		✓ (for property)		✓ (to buy your goods or

	Purposes of processing	Lawful basis			
		Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
	services that you may make with us (either as customer or supplier)		leases to you)		services, or conclude property sales or leases involving other or tenants)
c)	Sending you information (including direct marketing) as set out in the section "How do we communicate with you?", below	✓ (direct marketing information where we need your consent)	✓ (keeping you updated on the transaction)		✓ (to keep you updated on transactions, orders and with other helpful updates and direct marketing in other cases)
d)	Considering any Applicant details for recruitment purposes (please also see our separate candidate privacy notice)		✓		✓ (to recruit the best and most suitable applicants to help us to run and grow our business)
Background and Identity Check Information					
e)	Performing know your client and anti-money laundering checks in relation to transactions			✓	✓ (to ensure compliance with anti-money laundering requirements and good governance)
f)	Performing identity checks in relation to certain transactions			✓	✓ (to ensure that the identity of our customers/suppliers is verified)
g)	Performing credit checks in relation to transactions	✓			✓ (to make sure that those purchasing from us have the necessary funds and commitment to pay, to ensure we are paid)
Website Information					
h)	Ensure the operation and performance of the Website (PLEASE ALSO SEE THE COOKIES SECTION BELOW)				✓ (to ensure the Website functions correctly)

	Purposes of processing	Lawful basis			
		Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
i)	To improve the functionality of the Website				✓ (to keep the Website up to date and improve its functionality for the benefit of Website Users)
j)	To enable you to create accounts and log-in to them via the Website		✓		✓ (to grant you access to a private log-in where you can securely and easily access information relevant to you)
Customers and Suppliers					
k)	To deal with your requested or agreed property rental or purchase to complete the transaction with you		✓ (if you contract with us as an individual)		✓ (where you represent your employer or organisation, or a tenant who contracts with us)
l)	To take payment and receive / deliver goods or services to you or the business you represent, to deal with any complaints or any after sales services		✓ (if you contract with us as an individual)		✓ (where you represent your employer or organisation, or a tenant who contracts with us)
m)	Arranging appointments and organising access to property for maintenance and repair purposes, including obtaining and using Occupier details		✓ (if you contract with us as an individual)		✓ (where the occupier has not purchased the property from us)
n)	To carry out checks to identify potential fraudulent transactions, to prevent and detect crime and protect genuine customers and our business from fraud to minimise the risk of false details being used, and abuse of card / other details by fraudsters		✓		✓ (to protect our business, other tenants and the public from fraud and crime – this is also in the public interest)

		Lawful basis			
Purposes of processing		Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
All categories					
o)	Establishing and enforcing our legal rights and obligations and monitoring to identify and record fraudulent activity			✓	✓ (to protect our business, other tenants and the public from fraud and crime – this is also in the public interest and may be needed to deal with legal claims)
p)	Complying with requests, orders and instructions from law enforcement agencies, regulators, any court, parties to proceedings or otherwise deal with obligations required by law or regulators and to ensure good governance and compliance			✓ (where binding)	✓ (where not binding but good governance and in the public interest)
q)	For our general record-keeping and relationship management		✓ (if you contract with us as an individual)		✓ (where you represent your employer or organisation, or a tenant who contracts with us and we need this to run our business properly)
r)	Managing the proposed sale, restructuring or merging of any or all part(s) of our business, including to respond to queries from the prospective tenants or merging organisation				✓ (to sell any part of our business)
s)	To keep records required by law or to evidence our compliance with laws, including tax laws, consumer protection laws and data protection laws.			✓	
t)	Resolving any complaints from or disputes with you		✓ (if with you as an		✓ (to try and resolve any complaint or

		Lawful basis			
Purposes of processing		Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
			individual)		dispute you might raise with us and to deal with legal claims)

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand and improve the use of our Website.

5. Sensitive Information

Some of the processing described in the above table will include the processing of 'special categories of personal data' and/or sensitive personal data (together, "**Sensitive Information**" – as set out in the table at **paragraph 3**, above). This refers to sensitive or special categories of personal data which we are required to process with more care, according to applicable laws.

We will only process Sensitive Information in relation to you:

- a) in respect of access to property or reasonable adjustments, where this is required by law or with your explicit consent; or
- b) if in advance of an Event, we are provided with details of any dietary or mobility requirements that apply to you and which should be catered for at the relevant Event and this is based on your explicit consent.

6. Who do we share your personal data with, and why?

Sometimes we need to disclose your personal data to other people.

From time to time we may ask third parties or other group companies to carry out certain business functions for us, such as the administration of our Website and IT support.

These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data. Examples of these third party service providers include our IT systems software and maintenance, back up, and server hosting providers.

PinnPointUxbridge.co.uk and any personal data captured via that website are managed and administered on Annington's behalf by LSL Corporate Client Services Limited (trading as PRSim).

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, where the relevant disclosure is:

- (a) to Event organisers in relation to your attendance (or apologies) for an Event;
- (b) if we buy or sell our business (or part of it) in connection with a share or asset sale, we may disclose or transfer your personal data to the prospective seller or buyer and their advisors; and
- (c) if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- (a) IT support, Website and data hosting providers and administrators;
- (b) payment processors in relation to memberships and attendance at Events;
- (c) your agents and representatives, or (if you are an agent or representative) your client tenant;
- (d) tradesmen who carry out repairs and maintenance on your property so they can obtain access;
- (e) consultants and professional advisors including legal advisors, auditors and accountants;
- (f) courts, court-appointed persons/entities, receivers and liquidators;
- (g) business partners and joint ventures;
- (h) Event organisers and Event suppliers (e.g. the relevant catering company);
- (i) insurers; and
- (j) governmental departments, statutory and regulatory bodies including (in the UK) the Information Commissioner's Office, the police and Her Majesty's Revenue and Customs.

Where you rent a property from us with another person, the details of each tenant involved in any such transaction will be inseparable from the details of the other tenant and will all be retained together in respect of records of the rental transaction.

Even where you cease to be a tenant of the property and even if another tenant takes your place, the historical details must be retained for audit and integrity reasons and to comply with legal obligations. Please be aware that this means that where in future requests are made relevant to the tenancy of that property, details provided in response will include historical details of your tenancy and involvement.

7. Where in the world is your personal data transferred to?

Annington is UK based and the majority of our processing of your personal data takes place within the UK. However, some of our suppliers (please see above) may have processing operations in other jurisdictions and we may transfer your personal data to recipients outside the UK.

Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under the laws in your jurisdiction.

If any disclosures of personal data mean that your personal data will be transferred outside the European Economic Area, we will only make that transfer if:

- a) the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- b) we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract (like the contract terms sometimes called Model Contract Clauses issued by the European Commission) with the recipient (please contact info@pinpointuxbridge.co.uk if you wish to obtain a copy of these);
- c) the transfer is necessary for one of the reasons specified in data protection law, such as the performance of a contract between us and you; or
- d) you consent to the transfer.

8. How do we keep your personal data secure?

We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate security measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

9. **How long do we keep your personal data for?**

We will only retain your personal data for a limited period of time and for no longer than is necessary for the purposes for which we are processing it.

In these circumstances and others, personal data may be retained longer and this will depend on a number of factors, including:

- (a) any laws or regulations that we are required to follow;
- (b) whether we are in a legal or other type of dispute with each other or any third party;
- (c) the type of information that we hold about you; and
- (d) whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

10. **How do we communicate with you?**

Where you are a Key Contact, Interested Party or Tenant, we will use your personal data in order to contact you in relation to Events services, promotions and/or offers which may be of interest. In the case of a Key Contact, such communications will be to you as a representative of your employer or organisation (on a business to business basis).

In each case, such communications will be based on our legitimate interest and you will have the right to opt-out of receiving further marketing communications from us.

To the extent that we send any other direct marketing to you (on a business to consumer basis), we will ensure that we have a lawful basis and provide you with the opportunity to opt-out of receiving such communications where we rely on legitimate interest, or (where necessary) obtain your explicit consent.

11. **Cookies**

When you visit the Website, we generate one or more "cookies."

Cookies are files or pieces of information that may be stored on your computer (or other internet-enabled devices, such as a smartphone or tablet) when you visit the Website. A cookie will usually contain the name of the website from which the cookie has come from, the "lifetime" of the cookie (i.e. how long it will remain on your device) and a value, which is usually a randomly generated unique number.

We use cookies to make the Website easier to use and to better tailor our web presence and products to your interests and needs. Cookies may also be used to

help speed up your future activities and experience on the Website. We also use cookies to compile anonymous, aggregated statistics that allow us to understand how people use our web properties and to help us improve web structure and content. We cannot identify you personally from this information.

The table below summarizes the different types of cookie we use on the Website, together with their respective purpose and duration (i.e. how long each cookie will remain on your device).

Two types of cookies may be used on the Website - "session cookies" and "persistent cookies". Session cookies are temporary cookies that remain on your device until you leave the Website. A persistent cookie remains on your device for much longer or until you manually delete it (how long the cookie remains on your device will depend on the duration or "lifetime" of the specific cookie and your browser settings).

Cookies used on the Website:

Type of Cookie	What do they do?	Do these cookies collect my personal data / identify me?
Necessary	Cookies that are essential to making the Website work correctly. They enable visitors to move around our website and use our features. Examples include remembering previous actions (e.g. entered text) when navigating back to a page in the same session.	These cookies do not identify you as an individual. If you do not accept these cookies, it may affect the performance of our website
Performance	Cookies that help us understand how visitors interact with our web properties by providing information about the areas visited, the time spent on the website and any issues encountered, such as error messages. They help us improve the performance of our websites, alert of any concerns and more.	These cookies don't identify you as an individual. All data is collected and aggregated anonymously.
Functionality	Cookies that allow our web properties to remember the choices you make (such as your user name, language or the region you are in) to provide a more personalized online experience.	The information these cookies collect may include personally identifiable information that you have disclosed, such as a username, for example. We shall always be transparent with you about what information we collect, what we do with it and with whom we share it.

The cookies we use on our Website are as follows.

Our cookies

What	Why
<ul style="list-style-type: none"> CookieInfoScript 	<p>This is another functional cookie. It stores a boolean value (yes/no) and is used to decide if the Website should display the Cookie Bar at the bottom of the screen.</p> <p>By default this cookie is not set, but we use it to remember whether or not you have already agreed to accept cookies, so we do not keep showing you our cookies banner if you have.</p> <p>If you click the "I understand" button to close the cookies bar, this cookie is set and the code checks for this to decide if it should show the cookies banner on future visits</p>
<ul style="list-style-type: none"> view 	<p>This functional cookie is set when somebody clicks the Mobile/Desktop button in the footer. A cookie is then set to remember which version they opted to see and will allow the site to automatically redirect them to the correct site on future visits</p>
<ul style="list-style-type: none"> PHPSESSID 	<p>This is used for multiple functional reasons, including to remember the fact that you are logged in and who you're logged in as. it allows the Website to differentiate individual users</p>

Third party cookies – Google Analytics

What	Why
<ul style="list-style-type: none"> utmX utma utmb utmc utmt utmz 	<p>These cookies are permanent cookies and used by Google Analytics to help track Website Users on our Website (and beyond) and monitor its performance. You can find more information about these specific cookies here - goo.gl/cFSGua.</p> <p>We do not receive the details they collect but these cookies are used to monitor the Website's traffic and content as well as how it's performing in Search Engines.</p> <p>Google analyse the data collected and can tell us about how Website Users find our Website and how they use it.</p>

We do not currently employ any targeting or advertising cookies on our Website.

Most internet browsers are initially set up to automatically accept cookies. You can change the settings to block cookies or to alert you when cookies are being sent to your device. There are a number of ways to manage cookies. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings.

If you do not agree to our use of cookies, you should set your browser settings accordingly or not use the Website. Please be aware that if you disable the cookies that we use, this may impact your user experience while using the Website.

If you use different devices to view and access the Website (e.g. your computer, smartphone, tablet etc.), you will need to ensure that each browser on each device is adjusted to suit your cookie preferences.

12. **What are your rights in relation to your personal data and how can you exercise them?**

Where our processing of your personal data is based on your **consent** (please see above), you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we are relying on – in which case, we will let you know.

Where our processing of your personal data is based on the **legitimate interests** (please see above), you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Where we are processing your personal data for **direct marketing** purposes, you have the right to object to that processing. This will not affect our need to keep in touch with you for non-marketing reasons, such as where you are purchasing from us.

You have the right to (subject to applicable laws and certain limitations):

- (a) access your personal data and to be provided with certain information in relation to it, such as the purpose for which it is processed, the persons to whom it is disclosed and the period for which it will be stored;
- (b) require us to correct any inaccuracies in your personal data without undue delay;

- (c) require us to erase your personal data;
- (d) require us to restrict processing of your personal data;
- (e) receive the personal data which you have provided to us, in a machine readable format, where we are processing it on the basis of your consent or because it is necessary for your contract with us (please see the tables above) and where the processing is automated; and
- (f) object to a decision that we make which is based solely on automated processing of your personal data (however, we do not currently conduct any such decision making).

You also have the right to lodge a complaint with the Information Commissioner's Office, which is the UK data protection regulator. More information can be found on the Information Commissioner's Office website at <https://ico.org.uk/>.

13. Updates to this notice

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice by email. We also encourage you to check this notice on a regular basis.

14. Where can you find out more?

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact us at 1 James Street, London, W1U 1DR or via info@pinnpointuxbridge.co.uk.

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