



Box Property Solutions & Box Property Franchise Ltd Data Protection & Privacy Policy Notice

Privacy Notice

Introduction

This Privacy Notice applies across all websites that we own and operate and all services we provide, including our online and offline property marketing services and products, and any other apps or services we may offer (for example, events or training). For the purpose of this Notice, we'll just call them our 'services'.

When we say 'personal data' we mean information about you, like your name, email, address, telephone number, bank account details, payment information, support queries and so on. If you can't be identified (for example, when personal data has been aggregated and anonymised) then this Notice doesn't apply. Your personal data is data which by itself or with other data available to us can be used to identify you.

This Notice explains website data, cookies and what we do with your personal data. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you under the General Data Protection Regulation (GDPR) of 25th May 2018.

We may need to update this Notice from time to time. Where a change is significant, we'll make sure we let you know – usually by sending you an email.

Last updated 22 June 2018.

Who are we?

When we refer to 'we' (or 'our' or 'us'), that means Box Property Solutions LTD , a company registered in England and Wales with company number 6497953. Our headquarters are in Bradford, United Kingdom.

We provide online and offline property marketing services to property professionals, companies including estate and letting agents and the general public.

Box Property Solutions Ltd,
Newlands House One, Inspire Bradford Business Park, Newlands Way, Bradford, West Yorkshire, BD10 0JE
T: 0845 519 1250

www.boxpropertiesolutions.com E: info@boxpropertiesolutions.com

For European Union data protection purposes, you can contact our Data Protection Officer (DPO) at Elements Property, The Hive, Goldsmith Street, Nottingham, NG1 5JS or at privacy@boxpropertysolutions.com if you have any questions.

Our principles of data protection

Our approach to data protection is built around two key points. They're at the heart of everything we do relating to personal data.

Transparency: We take a human approach to how we process personal data by being open, honest and transparent.

Security: We champion industry leading approaches to securing the personal data entrusted to us.

Website data and cookies

Every time you visit one of our websites, the web server may collect and log certain information which we only keep as long as is necessary to make changes to the site's content or functionality to make it informative, easy to use and in usable in accordance with your preferences.

The cookies we use typically store information in the form of a session identification that cannot personally identify you, the user.

How we collect your personal data

When you visit our websites or use our services, we collect personal data. The ways we collect it can be broadly categorised into the following:

Information you provide to us directly: When you visit or use some parts of our websites and/or services we might ask you to provide personal data to us. For example, we ask for your contact information when booking jobs. If you don't want to provide us with personal data, you don't have to, but it might mean we cannot complete our services.

Information we collect automatically: We collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you're using

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our websites and services so that we can continue to provide the best experience possible (e.g. by personalising the content you see). Some of this information is collected using cookies and similar tracking technologies.

Information we get from third parties: The majority of information we collect, we collect directly from you. Sometimes we might collect personal data about you from other sources, such as publicly available materials or trusted third parties like our marketing and research partners. We use this information to supplement the personal data we already hold about you, in order to better inform, personalise and improve our services, and to validate the personal data you provide.

Where we collect personal data, we'll only process it:

- to perform a contract with you, or
- where we have legitimate interests to process the personal data and they're not overridden by your rights, or
- in accordance with a legal obligation, or
- where we have your consent.

If we don't collect your personal data, we may be unable to provide you with all our services, and some functions and features on our websites may not be available to you.

If you're someone who doesn't have a relationship with us, but believe that an agent has entered your personal data into our websites or services, you'll need to contact that agent for any questions you have about your personal data (including where you want to access, correct, amend, or request that the user delete, your personal data).

The types of personal data we collect and use

Whether or not you become a paying customer, we'll use your personal data for the reasons set out below and if you become a paying customer we'll use it to manage your account and any services ordered through it. The personal data we use may include:

- Full name
- Email address
- Company name
- Home or work address
- Contact telephone number

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- Website
- Where you heard about us
- What best describes you (e.g. estate or letting agent, EPC assessor, property photographer, floorplan provider, individual house seller or landlord)
- Password
- IP address
- Name and email address of any colleagues you want to receive email; notifications about orders
- Name and email address of any colleagues you want to receive email notifications about invoices
- Login details for third party services you consent to us using in order to provide the service you require (e.g. Zplan)
- Full or partial address of the property being marketed

If you request a quote and/or instruct us for a service requiring a visit to the property (e.g. an EPC):

- Full name, contact number and email of the person requesting the quote/or instructing us
- Full name, contact number and email of the owner/landlord/tenant of the property
- Full name, contact number and email of the person who will be granting access to the property
- Full name, contact number and address of the person who will be providing keys for the property
- Full address of the property being marketed

If you download information from our website (e.g. sample EPCs etc):

- Name
- Email address

Payment and financial data:

Box Property Solutions don't hold financial data you may provide in order to pay for services (e.g. credit card numbers, expiry dates, CVV numbers, bank account numbers, account holder information etc).

Instead, this data is held and processed by third parties who all have their own GDPR and Privacy Policies:

- <https://stripe.com/gb/privacy>

If at any point you require a refund directly from us via BACS transfer, we will keep a record of your bank details (e.g. sort code and account number) within our company banking portal for a period of at least one year.

Providing your personal data

We'll tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases, you must provide your personal data so we can provide services to you and contact you in matters relating to the services we provide you if required.

How we use your data

First and foremost, we use your personal data to operate our services and provide you with any services you've requested and to manage our relationship with you to ensure that the contractual arrangements between us can be properly implemented. We also use your personal data to comply with legal requirements and for other purposes, which may include the following:

To communicate with you. This may include:

- providing you with notifications relating to orders you place with us
- providing you with information you've requested from us (like training or education materials) or information we are required to send to you
- operational communications, like changes to our websites and services, security updates, or assistance with using our websites and services
- marketing communications (about Elements Property or another product or service we think you might be interested in) in accordance with your marketing preferences
- asking you for feedback or to take part in any research we are conducting (which we may engage a third party to assist with).

To support you: This may include assisting with the resolution of technical support issues or other issues relating to the websites or services, whether by email, in-app support or otherwise.

To enhance our websites and services and develop new ones: For example, by tracking and monitoring your use of websites and services so we can keep improving, or by carrying out technical analysis of our websites and services so that we can optimise your user experience and provide you with more efficient tools.

To protect: So that we can detect and prevent any fraudulent or malicious activity, and make sure that everyone is using our websites and services fairly and in accordance with our terms of use.

To market to you: In addition to sending you marketing communications, we may also use your personal data to display targeted advertising to you online – through our own websites and services or through third party websites and their platforms.

To analyse, aggregate and report: We may use the personal data we collect about you and other users of our websites and services (whether obtained directly or from third parties) to produce aggregated and anonymised analytics and reports, which we may share publicly or with third parties.

How we can share your data

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

- third party service providers and partners who assist and enable us to use the personal data to, for example, support delivery of or provide functionality on the website or services, or to market or promote our goods and services to you
- subcontractors and other persons who help us provide our products and services
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure
- parties connected with your account e.g. staff within your company, parent company or franchise
- other people where we have your consent.

International data transfers

Your personal data may be transferred outside of the UK and the European Economic Area. While some countries have adequate protections for personal data under applicable

laws, in other countries steps will be necessary to ensure appropriate safeguards apply to it. These include imposing contractual obligations of adequacy or requiring the recipient to subscribe or be certified with an ‘international framework’ of protection.

Security

We have put in place reasonable commercial standards of technology and operational security to protect all information provided by you from unauthorised access, disclosure, alteration, or destruction.

Retention

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you’ve requested or to comply with applicable legal, tax or accounting requirements).

We’ll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we’ll make sure it’s deleted or anonymised.

Your rights

It’s your personal data and you have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication, or send your request to privacy@boxpropertyolutions.com

You also have rights to:

- know what personal data we hold about you, and to make sure it’s correct and up to date
 - request a copy of your personal data, or ask us to restrict processing your personal data or delete it
 - object to our continued processing of your personal data
- If you’re not happy with how we are processing your personal data, please let us know by sending an email to privacy@boxpropertyolutions.com We will review and investigate your complaint, and try to get back to you within a reasonable time frame. You can also

complain to your local data protection authority. They will be able to advise you how to submit a complaint.

Monitoring of communications

Subject to all applicable laws, we'll monitor and record calls, emails, text messages, social media messages, live chat support transcripts, amendment requests and other communications in relation to your dealings with us. We'll do this for self-regulatory practices, quality control, staff training and issues relating to overdue invoices.

How to contact us

If you're curious about what personal data we hold about you or you have a question or feedback for us on this Privacy Notice, our websites or services, please get in touch.

Our email is privacy@boxpropertyolutions.com