

PRIVACY NOTICE

INTRODUCTION

1. **IMPORTANT INFORMATION AND WHO WE ARE**
2. **THE DATA WE COLLECT ABOUT YOU**
3. **HOW IS YOUR PERSONAL DATA COLLECTED**
4. **HOW WE USE YOUR PERSONAL DATA**
5. **DISCLOSURES OF YOUR PERSONAL DATA**
6. **INTERNATIONAL TRANSFERS**
7. **DATA SECURITY**
8. **DATA RETENTION**
9. **YOUR LEGAL RIGHTS**

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this Privacy Notice

This privacy notice aims to give you information on how we collect and process your personal data in a variety of circumstances. It is important that you read this privacy notice so that you are fully aware of how and why we are using your data. This version was last updated on 30th July 2020 and previous versions can be obtained by contacting us.

Controller

Ocasa Management Limited (company no. 12075849) (referred to as **we**, **us** or **our** in this privacy notice) is the controller and responsible for your personal data. If you have any questions about this privacy notice (including any requests to exercise any of your legal rights) please contact us by emailing jgodby@ocasahomes.co.uk.

Third-Party Links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE HOLD ABOUT YOU

Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, email address, online username or similar identifier and login details;
- **Technical Data** includes internet protocol (IP) address, 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;
- **Google Data** includes certain data regarding Google remarketing lists including the URL and referrer URL for the website that triggers a tag hit, the custom parameters used in your tracking tag, and any resulting remarketing list memberships;
- **Usage Data** includes information about how you use our website and services;
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Your Duty to Inform us of Changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

PRIVACY NOTICE

3. HOW IS YOUR PERSONAL DATA COLLECTED AND USED?

We use different methods to collect personal data from and about you. We have set out below a description of the personal data we collect, how and why it is collected and which of the legal bases we rely on to do so (including a description of the legitimate interest pursued). Note that we may process your personal data for more than one basis depending on the specific purpose for which we are using your data:

Personal Data Type	Collection Method	Basis of Use	Purpose
<ul style="list-style-type: none">Identity Data	<ul style="list-style-type: none">Your registration for, and use of, our website	<ul style="list-style-type: none">ContractLegitimate Interests (to run our website and business)	<ul style="list-style-type: none">To securely provide you (or your employer) with our products and services
<ul style="list-style-type: none">Google Data	<ul style="list-style-type: none">Use of cookies	<ul style="list-style-type: none">Consent	<ul style="list-style-type: none">To market and deliver retargeting services
<ul style="list-style-type: none">Technical DataUsage DataMarketing and Communications Data	<ul style="list-style-type: none">Interaction with our websiteUse of cookies	<ul style="list-style-type: none">Legitimate interests (to administer our IT systems and run our business and website)	<ul style="list-style-type: none">To keep our online avenues working, up to date and effectiveTo monitor and ensure effective operation of our products and services
<ul style="list-style-type: none">any of the personal data collected	<ul style="list-style-type: none">as above	<ul style="list-style-type: none">Legitimate interests (to run our company)	<ul style="list-style-type: none">Ancillary purposes, such as maintenance, back-ups and archiving

Further, please note the following:

- Legitimate Interest**

When we rely on "*Legitimate Interest*" we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

- Marketing**

If you are a customer or registered user of ours, we may contact you from time to time by email to provide some information about our products or services. You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us, as appropriate, at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service experience or other transactions.

We will get your express opt-in consent before we share your personal data with any company

PRIVACY NOTICE

outside of our own group for marketing unrelated to our company group.

4. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties (all established in the UK or European Economic Area unless otherwise stated) set out below for the purposes set out in the table in paragraph 3 above:

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances;
- Professional advisers including lawyers, bankers, auditors and insurers based in the European Union or United Kingdom who provide consultancy, banking, legal, insurance and accounting services; and
- Google in order to provide advertising and retargeting services.

If you need further information on who your data may be transferred to or any measures in place between us and the recipient of that data, contact us at the above email address to discuss this. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. INTERNATIONAL TRANSFERS

Unless noted above, we do not transfer your personal data outside the United Kingdom or European Economic Area (which has been deemed to be a jurisdiction of adequate protection for personal data received from the United Kingdom).

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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, how long a legal claim may be taken and whether we can achieve those purposes through other means, and the applicable legal requirements.

Unless we need to keep the personal data for longer (such as in the case that it is connected to actual or potential litigation or criminal charges), we usually take steps to effectively put your personal data beyond use 12 months after collection.

PRIVACY NOTICE

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request").
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected (subject to verification).
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

If you wish to exercise any of the rights set out above, please contact us. Please note that we may not always be able to comply with your request for specific legal reasons which will be notified to you, if applicable.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than

PRIVACY NOTICE

a month if your request is particularly complex or we receive a number of requests. In this case, we will notify you and keep you updated.

Supervisory Authority Contact

You have the right to make a complaint to a relevant supervisory authority responsible for data protection. The Information Commissioner's Office (**ICO**) is the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach a supervisory authority so please contact us in the first instance.