



PRIVACY NOTICE

July 2024

Contents

Contents	1
About this policy	3
About us	3
The personal data we collect about you	3
How your personal data is collected	4
How we use your personal data	4
Disclosure and transfer of your personal data	6
Security of personal data	7
Retention of personal data	7
Your legal rights	7
Updates to this Privacy Policy	9
How to contact us	9
Complaints	9
Third-Party Links	9

About this policy

Your privacy is important to the TT Group. This privacy policy is issued by Telereal Services Limited (registered company no. 04175679) (TT) on behalf of the TT Group so when we mention **we, us** or **our** in this privacy policy, we are referring to the relevant company in the TT Group responsible for processing your data. This privacy policy aims to give you information on how we collect and process your personal data through your use of our website, including how we use any personal data you may provide through our website when you submit an enquiry about a property.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data from you so that you are fully aware of how and why we are using your personal data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

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.

About us

The TT Group is made up of different legal entities. For the purposes of applicable data protection laws, TT will be a data controller of any personal data collected by us.

We have appointed a data protection manager (**DPM**) who is responsible for overseeing the protection of your personal data. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPM using the details set out below:

Email address: data.protection@ttg.co.uk

Postal address: 5 Aldermanbury Square, London, EC2V 7HR

Telephone number: 020 7796 5500

The personal data we collect about you

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

- **Identity Data** includes, first name, last name, title.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments made to and from you.
- **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 this website.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect and use **Aggregated Data** such as statistical or demographic data in line with our legitimate interests in terms of business development. Aggregated Data could be derived from your personal data but is not considered personal data as it will not directly or indirectly reveal your identity.

How your personal data is collected

Information you provide to us

We collect your personal data when you interact with us.

For example, you may give us details of your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes personal data you provide when you:

- submit an enquiry form on our website;
- subscribe to our service or publications, for example our Property Updates;
- request marketing communications to be sent to you; or
- give us feedback or contact us.

We may record telephone calls with you in line with our legitimate interests in protecting against fraud, and for quality assurances and training purposes. We will provide you with notice where we intend to record calls.

We may also use CCTV in line with our CCTV Policy (which can be provided on request) and our legitimate business interests, to support the safety and security of our staff and our premises. Cameras may be placed both externally and internally in public and common areas. Signage on site will the presence of cameras.

Information collected through your use of our website

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

Information provided to us by third parties or publicly available sources

We will receive personal data about you from various third parties and public sources such as analytics providers like Google based outside the EU and social media providers such as LinkedIn.

How we use your personal data

Purposes for which we will use your Personal Data

We will only use your personal data in accordance with applicable data protection laws. We have set out below the ways we plan to use your personal data, and the legal bases for doing so. We have also identified what our legitimate interests for using your personal data are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data.

We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract, we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) 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).

- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

Please contact us if you would like more details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Category of personal data	Lawful basis for processing your personal data
To register you as a new or prospective tenant.	(a) Identity (b) Contact	(a) Performance of a contract with you.
To contact you with regards to your enquiry / process your application form to include: (a) Manage payments, fees and charges; and (b) Collect and recover money owed to us.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (e.g. to recover debts due to us).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy; and (b) Asking you to leave a review or take a survey.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (e.g. to keep our records updated and to study how customers use our products/services).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (e.g. for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). (b) Necessary to comply with a legal obligation.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and	(a) Necessary for our legitimate interests (e.g. to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).

	Communications (f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (e.g. to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Necessary for our legitimate interests (to develop our products/services and grow our business).

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. As noted below, you have the right to withdraw consent to marketing at any time by contacting us.

Marketing

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 at any time.

We use Mailchimp to use and store data for marketing purposes. For further information, please see the Mailchimp website <https://mailchimp.com/> or contact data.protection@ttg.co.uk

Use of Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the contact details in the 'How to contact us' section of this privacy policy.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis for doing so.

Disclosure and transfer of your personal data

We may share your personal data with the parties set out below for the purposes set out in this privacy policy:

- Internally within the TT Group, including to our shareholders;
- Externally to service providers, agents, professional advisers and HM Revenue & Customs. External service providers include Mailchimp <https://mailchimp.com/>

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.

We do not transfer your personal data outside the European Economic Area. However, there may be circumstances in which we share your personal data with our shareholders and other members of our group. Those entities might be located outside of the European Economic Area such as in the British Virgin Islands. In those circumstances, we will only make such transfers in accordance with the UK General Data Protection Act 2018 (including by entering into appropriate standard contractual clauses).

We reserve the right to disclose your personal data as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator, national security, for the purposes of public importance or any other legal or investigatory process involving us. Should we, or any of our affiliated entities, be the subject of a takeover, divestment or acquisition we may disclose your personal data to the new owner of the relevant business and their advisors on the basis of our legitimate interest.

Security of personal data

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. 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 and who will only process your personal data on our instructions, subject to a duty of confidentiality.

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.

Retention of personal data

We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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.

Your legal rights

Data protection laws give you a number of rights as set out below. If you would like to exercise any of your rights, please contact us using the contact details located at the 'How to contact us' section below. We will respond to all requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Request access: You have the right to ask for a copy of the personal data we hold about you free of charge (commonly known as a "data subject access request"). We may charge a

'reasonable fee', if we think that your request is excessive, to help us cover the costs of locating the information you have requested.

Request correction: You may notify us of changes to the personal data that we hold about you. This enables you to have any incomplete or inaccurate personal data we hold about you corrected or updated.

Request erasure: If you think that we should not be holding or processing your personal data anymore, you may request that we delete it. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing: You have the right to 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing: You have the right to 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:

- If you want us to establish the data's accuracy.
- Where you believe our processing of your personal data is against the law.
- Where you believe that we no longer need to hold your data for the purposes for which it was collected, but you still need your personal data to establish, exercise or defend a legal claim.
- You have objected to our use of your personal data, and we need to verify whether we have overriding legitimate grounds to use it.

Request portability: If you wish to transfer your personal data to you or to a third party (and certain conditions are satisfied), 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: If you previously gave us your consent (by a clear affirmative action) to allow us to process your personal data, for a particular purpose, but you no longer wish to consent to us doing so, you can contact us to let us know that you withdraw that consent. This will not affect the lawfulness of any processing carried out before you withdraw your consent, however, if you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (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.

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 could refuse to comply with your request in these circumstances.

Updates to this Privacy Policy

This privacy policy was last updated in July 2024. We reserve the right to amend this privacy policy from time to time. If we decide to change this privacy policy, we will post the changes on our website so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

How to contact us

If you have any questions or concerns about this privacy policy or wish to exercise any of your legal rights, please contact us by email at data.protection@ttg.co.uk, by telephone on +44(0)20 7796 5500 or by post at 5 Aldermanbury Square, London, EC2V 7HR.

Complaints

You can make a complaint about our data processing activities by contacting us using the contact details above. Alternatively, you may make a complaint to the UK supervisory authority, which is the Information Commissioner's Office (ICO), by visiting their website at www.ico.org.uk, by phoning 0303 123 1113 (local rate) / 01625 545 745 (national rate) or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. We always appreciate the opportunity to discuss and resolve your concerns before you make a complaint to the Information Commissioner's Office.

Third-Party Links

This website and policy 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 policy of every website you visit.