

INTRODUCTION

Chiltern Hills Lettings & Sales is committed to ensuring that your privacy is protected and recognize that when you choose to provide us with information about yourself, you trust us to act in a responsible manner with that information and in accordance with our legal responsibilities under applicable data protection laws.

This Privacy Policy sets out the basis on which any personal data we collect from you through our website(<http://www.chilternproperty.com>) (Our Site), or that you provide to us through Our Site or via other methods you may communicate with us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it:

IMPORTANT INFORMATION AND WHO WE ARE:

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

By accessing, browsing or otherwise using Our Site you confirm that you have read and agree to this Privacy Notice. If you do not agree with any part of this Privacy Notice, you should not use Our Site or use our services.

We reserve the right to change the contents of Our Site, including this Privacy Notice at any time, by posting such changes on Our Site. It is your responsibility to familiarise yourself with the Privacy Notice regularly to ensure that you are aware of any changes. Your continued use of Our Site following the posting of any such changes will constitute your acceptance of the revised Privacy Notice.

Contact details

Chiltern Hills Lettings & Sales is the trading name of: Chiltern Hills (Hw) Ltd, whose registered number is 6921480 and registered office is 19 Crendon Street, High Wycombe, Bucks, HP13 6LJ. Chiltern Hills Slough address is 286 Bath Road, Slough, Berkshire, SL1 4DX (“We/ ”Us/ Our”)

Changes to the privacy policy and your duty to inform us of changes

This version was last updated on May 24th 2018.

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.

Third-party links

This 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 policy of every website you visit.

WHAT INFORMATION DO WE COLLECT?

We may collect and process information that You provide to Us, via Your use of Our Site or Our Services, where You voluntarily consent to submitting it, for example, when registering for an Account, filling in forms or fields on Our Site, accessing and interacting with Services provided by Us; or corresponding with us in any way. This may include such personal information as:

- Name
- Email address
- Postal address
- Username and password
- Telephone and/or fax number
- Date of birth
- Demographic information
- Marital status
- Nationality
- Tax status

- Mortgage and / or insurance details
- Payment information (such as a credit card) and bank account details
- Future communication preferences
- Telephone number and recordings when you call our customer service line

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us 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:

- contract with us to provide property services;
- request marketing to be sent to you
- Information we collect when you visit our sites, view our online ads or promotions, or use our mobile applications or other services

We use cookies and other technologies to collect information when you visit our sites, view our online advertisements or promotions, or use our mobile applications or other services. The following are examples of information we may collect with these technologies:

- Information about your device browser and operating system.
- IP address
- Web pages you view
- Links you click
- Chiltern Hills Lettings & Sales emails you open

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:

Technical Data from the following parties:

- analytics providers such as Google based outside the EU;
- advertising networks such as Facebook Ad Platform based outside the EU; and

- search information providers such as Google based outside the EU.

Identity and Contact Data from the following parties:

- executive agencies such as the Land Registry based inside the EU; and
- property portals such as Rightmove, zoopla, prime location and On The Market based inside the EU.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience.
- Where it is necessary for us to comply with legal and regulatory requirements.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via telephone, post, email or other electronic means. You have the right to withdraw consent to marketing at any time by contacting us

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We will use your personal information in the following ways. We are also required by law to state a “legal basis for processing”, i.e. to tell you on what grounds we are allowed to use your information, and this is also set out below:

Purpose/Activity	Legal basis for processing including basis of legitimate interest
To register you as a new customer	Performance of a contract with you
To deliver services to you, including: (a) Manage payments, fees and charges	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

(b) Collect and recover money owed to us	
To manage our relationship with you which will include: (a) Notifying you about changes to our services, terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our property services)
To provide you with information that you have requested e.g. a newsletter, bulletins;	Consent – we only use your personal information for this purpose if you have asked us to do so. You can withdraw your consent at any time.
To respond to specific queries you may raise regarding Chiltern Hills Lettings & Sales and its services;	Consent – we only use your personal information for this purpose if you have asked us to do so. You can withdraw your consent at any time.
To provide you with better ways of accessing information from this website and improve Your experience on Our Site;	Our legitimate interests – we use your personal information to help us to deliver the best online experience to you and other website users.
To measure or understand the effectiveness of advertising we serve to you and others, and deliver relevant advertising to you	Our legitimate interests – we use your personal information to help us to deliver the best online experience to you and other website users and to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them	Consent – we only use your personal information for this purpose if you have asked us to do so. You can withdraw your consent at any time.

MARKETING

We aim to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Where you contact us through the 'contact' page of Our Site, or make an enquiry in branch or on the phone, we will use the details you have supplied to us to provide you with our general property marketing unless you choose to 'opt-out' of these communications. If you do 'opt-out' then we will not send you information relating to our general property marketing. We may however contact you in future by phone or by post where we reasonably believe (on the basis of services that we are providing to you) that there are additional, different services which you may be interested in. This may be, for example to offer you mortgage and protection services or removal services. We rely on legitimate interests as a lawful basis for processing your information to conduct this above marketing and we ensure you always have the right to opt-out of receiving marketing communications from us. If you wish to never receive any form of marketing communication from us you can let us know by contacting us (using the details provided below).

If, at any time, you prefer not to receive further communications from us (except in connection with information, products or services that you specifically request), you will have the ability to unsubscribe from such communications by means of a link provided in every message that is sent to you by us or by contacting us.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will not share your personal data with any company outside Chiltern Hills Lettings & Sales for marketing purposes.

OPTING OUT

You can ask us to stop sending you marketing messages at any time by contacting us 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 purchase, service experience or other transactions.

HOW AND WHERE DO WE STORE YOUR DATA?

We only keep Your data for as long as We need to in order to use it as described above in section 5, and/or for as long as We have Your permission to keep it and/or as required under Data Protection Legislation.

Your data will only be stored within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein).

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. 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.

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.

DO WE SHARE YOUR DATA?

We may share Your data with other companies where we have a legitimate interest to do so. This could include:

- Contractors;
- Mortgage brokers;
- Solicitors;
- Surveyors;
- Photographer/Floorplanner/EPC engineers;
- For Sale/To Let Board Companies;
- Other agents for the purpose of receiving due commission if we introduce you to a property and they later; and
- 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 policy.

We contract with third parties to provide them with Services to help facilitate Your engagement with their products and services and also to supply products and services to You on Our behalf. These may include, but are not limited to, payment processing, delivery of goods and services, conveyancing, mortgage lending, anti-money laundering searches, due diligence searches, search engine facilities, advertising and marketing. In some cases, the third parties may require access to Your Personal Data. Where any of Your Personal Data is required for such a purpose, We will ensure that Your data is processed securely, and in accordance with Data Protection Legislation.

We will only process Personal Data where We have a lawful basis for doing so. Typically, although not exclusively, this will be because:

- You have given us clear, unambiguous affirmative consent to do so; or
- the processing is necessary to fulfil a contract that You have entered into or as a preliminary to You entering into a contract.

We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any Personal Data. We may from time to time share such anonymised data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used in compliance with Data Protection Legislation.

In certain circumstances We may be legally required to share certain data held by Us, which may include Your Personal Data, for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from You in order to share Your Personal Data in such circumstances and will comply as required with any legally binding request that is made of Us.

HOW CAN YOU CONTROL YOUR DATA?

When You submit Personal Data, to Us You will be given options to restrict Our use of Your data. In particular, We aim to give You strong controls on Our use of Your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us or select third parties which You may do by declining the option to receive such communications at the point of accessing the Services or by unsubscribing using the links provided in Our emails, by managing Your Account or

through making a request to info@chilternproperty.com

Your Right to Withhold Information

You may access certain areas of Our Site without providing any data beyond that required for the function that You wish to use, to operate. However, to use all features and functions available on Our Site or within Our Services and specifically where Your Personal Data is a prerequisite for the operation of that Service You may be required to submit or allow for the collection and processing of certain data. Where that is the case, We will advise You at the point that You seek access to such Services. Where, in such circumstances, you chose to withhold any Personal Data requested by us, it may not be possible to access parts of Our Site or to use the Services that you are requesting access to.

You may restrict Your internet browser's use of Cookies. For more information, see section 12.

HOW CAN YOU ACCESS YOUR DATA?

You have the legal right to:

- ask for a copy of any of Your Personal Data controlled by Us.
- correct any information that is controlled by Us
- delete information controlled by Us

Where We process Your data on behalf of a third party (who is the data Controller) you should make requests in the first instance to them.

We will not charge a fee for complying with such requests unless the request is manifestly unfounded or excessive or unless repeated requests are made for the same data. Such fee shall not exceed £10 per instance.

Requests should be made by email to info@chilternproperty.com

Where We are the Controller of the Personal Data that You have requested, We will respond to the request within 1 month, unless the request is particularly complex.

As data Controller We may exercise the right to withhold details of Personal Data requested by You where disclosure would adversely affect the rights and freedoms of others.

USE OF WEBSITE CONTENT

You may use any of the information on this web site, whether originated by Chiltern Hills Lettings & Sales or not, only for your personal purposes. You may not use any of the information on this web site for commercial purposes without the prior written consent of Chiltern Hills Lettings & Sales.

DISCLAIMER OF LIABILITY

Under no circumstances shall Chiltern Hills Lettings & Sales be liable for any damages whatsoever as a consequence of your doing or not doing anything as a result of viewing or reading any of the material on this web site.

COPYRIGHT

The ownership and copyright of the design and content of this web site vests in Chiltern Hills Limited. You may download or print property details for your personal non-commercial use only. You may not alter any of the details or images. You may not make them available for public viewing or use them for or in connection with any commercial purpose.

DATA RETENTION POLICY

We wish to keep consumers advised of our services and therefore retain data for marketing purposes. From time to time consumers request that we stop providing them with information about our services.

In the event that this request is made then the data is anonymised & frozen within our system and put 'beyond use'; this means that apart from the Data Protection Officers, the data will no longer appear to exist to all other members of staff, or be visible on any of our computer systems save for, the automated system checks carried out, which are compulsory in order for us to ensure they are not contacted again if they have asked not to be contacted or marketed to.

We have been advised by the ICO to have a granular [Data Retention Matrix](#).

From time to time consumers ask that their data be deleted.

Once a consumer's data falls outside of our Legal Retention periods', a consumer may insist that their data is deleted. As far as is reasonably possible we will delete the data and advise the consumer that as we acquire data from various legitimate sources, their contact details may be purchased and added back into our database which may therefore mean that they could be contacted in a future marketing campaign. At that point, they would be required to submit a request to invoke the companies Right to Erasure Procedure contained herein. As part of this procedure a consumer can either choose the right to be forgotten whereby their data is anonymised and frozen or insist their data be deleted again.

In the unfortunate event that we have a legal requirement to produce data by the courts, the police or other public authority, that request should be made in writing to The Data Protection Officers, details of which can be found below and/or on our website.

The Data Protection Officers will facilitate the unfreezing of the data within the system to comply with the public authorities to produce said data.

DATA RETENTION MATRIX - POTENTIAL BUYERS & TENANTS, BUYERS & TENANTS, OR OCCUPANTS

You give your consent for us to hold your information and contact you when you are registered by our staff as looking to buy, rent or reside in a property, you will also receive a copy of our privacy policy

We will retain your data for the following periods of time:

Description	We will send you marketing emails and newsletters until you	We may communicate with you by phone, email or letter until you	We will retain information on you in our systems but not use it for any marketing purposes until	In addition to our obligations under the Limitations Act 1980 and to Statutory bodies we retain this information because
If you register with us but do not view any properties	Unsubscribe Or Have not responded to any of our email communications for 1 year	Tell us not to do so Or 3 years from your registration with us	14 years after you register with us	We have obligations for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise.
If you view properties	Unsubscribe Or Have not responded to any of our email communications for 3 years	Tell us not to do so Or 6 years from your registration with us	14 years after you register with us	We have obligations for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise.
If you make an offer to purchase or rent a property	Unsubscribe Or Have not responded to any of our email communications for 3 years	Tell us not to do so Or 6 years from your offer being processed as not progressing by us	14 years after your offer is processed as not progressing by us	We have obligations for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise.
If you purchase or rent a property	Unsubscribe Or Have not responded to any of our email communications for 3 years	Tell us not to do so Or 6 years from your completion of sale or end of tenancy through us	14 years after your completion of sale or end of tenancy through us	We have obligations for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise.
If you reside as an occupant in a property	Unsubscribe Or Have not responded to any of our email communications for 3 years	Tell us not to do so Or 6 years from the end of the tenancy or ownership to which your occupation relates	14 years from the end of the tenancy or ownership to which your occupation relates	We have obligations for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise.

DATA RETENTION MATRIX – POTENTIAL LANDLORDS & SELLERS, LANDLORDS & SELLERS, OR CORPORATE CLIENTS

You give your consent for us to hold your information and contact you when you are registered by our staff as looking to let or sell a property, you will also receive a copy of our privacy policy.

We will retain your data for the following periods of time:

Description	We will send you marketing emails and newsletters until you	We may communicate with you by phone, email or letter until you	We will retain information on you in our systems but not use it for any marketing purposes until	In addition to our obligations under the Limitations Act 1980 and to Statutory bodies we retain this information because
If you request a lettings market appraisal for your property	Unsubscribe Or Have not responded to any of our email communications for 3 years	Tell us not to do so Or 6 years from your last appointment or transaction with us	6 years from your last appointment or transaction with us	There is no requirement for extended retention
If you instruct us to let your property	Unsubscribe Or Have not responded to any of our email communications for 3 years	Tell us not to do so Or 6 years from the end of your marketing contract or final day of the last tenancy	14 years after the end of your marketing contract or final day of the last tenancy	We have obligations for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise.
If you request a sales market appraisal for your property	Unsubscribe Or Have not responded to any of our email communications for 3 years	Tell us not to do so Or 6 years from your last appointment or transaction with us	6 years from your last appointment or transaction with us	There is no requirement for extended retention
If you instruct us to sell your property	Unsubscribe Or Have not responded to any of our email communications for 3 years	Tell us not to do so Or 6 years from the end of your marketing contract or completion of your last transaction with us	14 years after the end of your marketing contract or completion of your last transaction with us	We have obligations for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise.

DATA RETENTION MATRIX – CONTRACTORS

You give your consent for us to hold your information and contact you when you are registered by our staff as a supplier, you will also receive a copy of our privacy policy. We will retain your data for the following periods of time:

Description	We will send you marketing emails and newsletters until you	We may communicate with you by phone, email or letter until you	We will retain information on you in our systems but not use it for any marketing purposes until	In addition to our obligations under the Limitations Act 1980 and to Statutory bodies we retain this information because
If you are registered with us to provide contractor services	We will not send you any marketing material	Tell us not to do so Or The duration of the contractor agreement and an additional 6 years	14 years after your contractor agreement with us ends	We have obligations for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise.

DATA RETENTION MATRIX – INTERVIEWEE, EMPLOYEE, OR NEXT OF KIN

You give your consent for us to hold your information and contact you when you are registered by our staff when being offered employment, an interview or when provided as Next of Kin, you will also receive a copy of our privacy policy.

We will retain your data for the following periods of time:

Description	We will send you marketing emails and newsletters until you	We may communicate with you by phone, email or letter until you	We will retain information on you in our systems but not use it for any marketing purposes until	In addition to our obligations under the Limitations Act 1980 and to Statutory bodies we retain this information because
If you have registered for an interview with us	Unsubscribe Or Have not responded to any of our email communications for 3 years	Tell us not to do so Or 3 years from your last interview with us	3 years after you interview with us	There is no requirement for extended retention
If you have been registered as an employee	Unsubscribe Or Have not responded to any of our email communications for 1 year after the end of your employment	Tell us not to do so Or 6 years from the end of your employment with us	6 years after you have ceased employment with us	We have obligations for the security of our staff and properties we market and to protect ourselves against any legal claims which may arise.
If you are registered with us as an employee's Next of Kin	We will not send you any marketing material	We will not communicate with you unless necessary for Next of Kin purposes	6 months after the employee for which you are Next of Kin leaves the company's employment	We will not retain your personal data longer than is necessary as Next of Kin

You have the right at any time to request that your data be made unavailable to all of our staff except our Data Protection Officers or Statutory Bodies with legal rights to view the data.