



Privacy Policy

Introduction

Keningtons LLP respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about how we look after your personal data and tell you about your privacy rights and how the law protects you.

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 processes your personal data.

It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

Controller

Keningtons LLP (collectively referred to as Keningtons LLP, "we", "us" or "our" in this privacy notice) is the data controller and we are responsible for your personal data.

Contact details

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), 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 the ICO so please contact us in the first instance.

You can contact us at: info@keningtons.com.

Or by post at

Keningtons

72-75 Marylebone High Street

London

W1U 5JW

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.

Third-party links from our website

Our website and property particulars 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 collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us, or details we hold through our Property Management systems and processes.
- **Technical Data** includes internet protocol (IP) address, your login data, 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.
- **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 your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We do not knowingly collect any data about children.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. 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 and contact details by filling in forms on our website, or by corresponding with us by post, phone, email, in person, or otherwise.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.



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

These include: Companies House, credit reference agencies, Land Registry title and search agencies, intermediaries who may introduce or refer you to us or with whom you are already a client.

4. 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 such as our clients) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

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 email.

Purposes for which we will use your personal data

The lawful basis for our processing of your personal data is set out below, including the basis of legitimate interest:

- **Identity and Contact Data** will be used on the following basis:

to register you as a client which enables us to deliver the services we are engaged to provide to you;

to administer and protect our business which is necessary for our legitimate interests (mainly for running our business, provision of administration and IT services, network security, to prevent fraud) and in order to comply with our legal obligations;

to supplement the Marketing and Communications Data we hold about you.

to register you as an applicant who has requested to be sent property particulars either by email or post.

- **Financial and Transaction Data** will be used on the following basis:

to manage payments, fees and charges which enable us to deliver the services we are engaged to provide to you; and

to collect and recover money owed to us, which is which is necessary for our legitimate interests (to recover debts due to us).

to carry out our Property Management functions and processes.

to satisfy enquiries that we are required to undertake relating to a potential property transaction.



- **Technical and Usage Data** will be used on the following basis:

to use data analytics to improve our website, products/services, marketing, and customer relationships which is necessary for our legitimate interests (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).

- **Marketing and Communications Data** will be used on the following basis:

to make suggestions and recommendations to you about services that may be of interest to you which is necessary for our legitimate interests (to develop our products/services and grow our business).

Marketing

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing. You can ask us or third parties to stop sending you marketing messages at any time by contacting us at info@keningtons.com at any time, or by unsubscribing from the relevant communication.

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

5. Disclosures of your personal data

We may share your personal data with sub-contractors or sub consultants who are engaged by us to assist in delivering services to you.

We may share data with other organisations including: regulators, statutory bodies, the FCA, debt recovery organisations, claims organisations such as PI brokers, insurers and solicitors, public information resources, credit reference agencies, counterparties to any transaction, law enforcement agencies, or anti- money laundering services.

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.

6. International transfers

We do not knowingly transfer your personal data outside the European Economic Area (EEA).

7. 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.

8. Data retention

How long will you use my personal data for?

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 and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, for example, to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- To withdraw consent.

If you wish to exercise any of the rights set out above, please contact us at: info@keningtons.com.

Fees

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 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.

24 May 2018