

## Sugarhouse Properties Privacy Policy and Cookie Policy

Sugarhouse Properties respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we collect, look after and process your personal data. This policy will also tell you about your privacy rights and how the law protects you.

It is important that you read this privacy notice together with any other privacy notice 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. This privacy notice supplements any other notices and is not intended to override them.

Sugarhouse Properties' website is not intended for children and we do not knowingly collect data relating to children.

Please also refer to the 'Glossary' (which is located at the end of the policy) to understand the meaning of some of the terms used in this privacy notice.

### 1. Important information and who we are:

#### Purpose of this privacy notice

This privacy notice aims to give you information on how Sugarhouse Properties collects and processes your personal data through your use of our website or when contacting our office with an enquiry, including any data you may provide through our website, when utilising our site and/or related platforms, searching for a property using the site's property search, "report a repair" or contact us options, advertising a property with us, and/or entering into a tenancy agreement or bills included package with us.

#### Controller

Sugarhouse Properties is the controller and responsible for your personal data (collectively referred to as "Sugarhouse Properties", "Sugarhouse (Leeds) Ltd", "Sugarhouse", "we", "us" or "our" in this privacy notice).

Sugarhouse Properties will act as a data controller in respect of personal data collected on your behalf from an employer, guarantor, supplier or third party during the application process required to engage and utilise our services.

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data protection officer using the details set out below.

Contact details for any data protection questions or data subject access request (SAR).

Our full details are: Sugarhouse (Leeds) Ltd, First Floor Office, 21 Otley Road, Headingley, Leeds, LS6 3AA

Full name of legal entity: Sugarhouse (Leeds) Ltd, company registration number: 7594152

Email address: SAR@sugarhouseproperties.co.uk

Postal address: Michael McGrath, Sugarhouse (Leeds) Ltd, First Floor Office, 21 Otley Road, Headingley, Leeds, LS6 3AA

Telephone number: 0113 816 0131

If you feel that we have not acted in accordance with the policy, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://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.

Changes to the privacy notice and your duty to inform us of changes:

This version was last updated on 18th May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if any of your 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 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, middle names(s), maiden name, surname, username or similar identifier, marital status, title, date of birth and gender, proof of ID such as passport, driving licence or biometric residence permit, signature
- Contact Data; includes address history, email address and telephone numbers.
- Financial Data; includes bank account details, financial referee details, employment details, national insurance number, gross income, details of proof of earnings and home owner status.
- Transaction Data; includes details about payments to and from you and other details of services we have provided to you or that you have paid for.
- ⊖ Technical Data; includes internet protocol (IP) address, browser cookies, details of the time that you spend on our site, your login data excluding passwords, 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 or our third parties.
- Profile Data; includes your username, your interests, property preferences (such as price, size and location), feedback, survey responses and platform communications between you and other customers of Sugarhouse Properties.
- Usage Data; includes information about how you use our website and services.
- Marketing and Communications Data; includes your communication preferences in receiving marketing from us and our third parties.
- We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so

that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

In most instances, we do not collect any Special Categories of Personal Data about you as a customer (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, genetic and biometric data).

We may process Special Category Data if you choose to provide this as a form of identification, or to satisfy the Government Right To Rent legislation. We may collect the following Special Category Data during an application or renewal of a contract with us.

Special Category Data:

We do not collect any information about criminal convictions and offences. However, if you are a tenant, landlord or guarantor, our employee's or third parties may undertake credit reference checks utilising your details which are collected on our document platform, via email or in person. This is so we can administer your contract and ensure an appropriate agreement is concluded. This is discussed further below.

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 services). In this case, we may have to cancel, suspend or terminate a service or contract which 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, Contact and Financial Data by filling in forms, speaking with one of our employees', creating an account with us, using our e-document system, or in your capacity as a guarantor, landlord or tenant.
- We will also collect data by corresponding with you by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our services;
  - Instruct us to advertise a property in a capacity as a landlord or property company
  - act as a guarantor for a tenant, using any of the methods above
  - create an account on our website, or register with our office via phone, email or SMS message
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey
  - giving feedback
- Automated technologies or interactions. As you interact with our website or e-document system, 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. We may also receive technical data about you if you visit other websites employing our cookies.

Please see our Cookie Policy below for further details.

- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below;
- Technical Data from the following parties;
- Analytics providers such as Google Analytics; and
- Advertising networks such as Google AdWords, Bing Ads, Facebook or any other social media platform
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators.
- Identity and Contact Data from publicly available sources based inside the EU.

#### 4. How we use your personal data

We will only use your personal data within the constraints of the law. Most commonly, we will use your personal data in the following circumstances:

- While arranging a property viewing, or providing you with information about one of our services;
- Where we need to perform a contract, we are about to enter into or have entered into with you as a tenant or landlord, or to facilitate contacts or other arrangements entered in to by you and a third party via our office or website (For the avoidance of doubt any Assured Shorthold Tenancy, licence, or other such agreement to occupy or our inhouse or third party bills included packages), effecting credit reference checks and facilitating payments; along with carrying out our obligations arising from or in relation to your contract with a third party.
- 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.
- 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 third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us using the the following email address: [optout@sugarhouseproperties.co.uk](mailto:optout@sugarhouseproperties.co.uk).

Purposes for which we will use your personal data:

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note; We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need 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	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new tenant, guarantor, or landlord	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
To facilitate providing information about properties of interest, or bills included packages, arrange viewings, make bookings, or find potential housemates	(a) Identity (b) Contact (c) Profile Data	Necessary for our legitimate interests (to provide tenants with the ability to find properties or services of interest and Sugarhouse employees' to arrange viewings or make bookings.
To facilitate the protection of users' tenancy deposits with a regulated deposit protection provider	(a) Identity (b) Contact	(a) Necessary to comply with a legal obligation (facilitate the compliance with landlords' legal obligations)  (b) Performance of a contract concluded in your interests  (c) Necessary for our legitimate interests (To keep you informed in respect of your deposit protection and to provide with an efficient online facility to protect tenancy deposits)
To allow landlords or Sugarhouse employees' to facilitate our all-inclusive bills tariffs, to an in-house or third-party supplier, on a tenant or landlords behalf	(a) Identity (b) Contact (c) Financial	Necessary for our legitimate interests (to provide landlords with the ability to switch energy and or utility providers / tariffs to the benefit of their property portfolio or current tenant/s
To process the following:  (a) Manage payments, fees and charges, including facilitating credit reference checks and facilitating payments  (b) Facilitate any contracts or arrangements entered in to between you and a third party (including Assured Shorthold Tenancy, Licence or any other	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Performance of a contract with you

<p>agreement to occupy or bills included packages)</p> <p>(c) Collect and recover money owed to us</p>		
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) If you are a landlord, to send you e-mails detailing the relevant statistics about your property portfolio while marketed with Sugarhouse</p> <p>(d) If you are a tenant or guarantor to contact you via email and SMS or our e-document system to notify you if the rent due under an Assured shorthold tenancy or bills included package has fallen in to arrears, or if a rent or tenancy related payment is coming due</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile Data</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated, to keep you informed in respect of your property lets, and to study how customers use our products/services)</p>
<p>To enable you to partake in a competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To perform our legal obligation under fraud protection regulations and credit risk reduction</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p>	<p>(a) Necessary to comply with a legal obligation</p>
<p>To administer and protect our business and our website or software/s (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business</p>

<p>(b) To allow you to participate in interactive features of our service when you choose to do so.</p>		<p>reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you. This includes Google Analytics which tracks the pages you visit on our site</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, services, marketing, customer relationships and experiences. This includes Google Tag manager, AdWords, Analytics, Facebook and Bing</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>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)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
<p>To facilitate Right to Rent checks which are undertaken by third parties</p>	<p>(a) Sensitive Category Data</p> <p>(b) Identity</p>	<p>(a) Necessary to comply with a legal obligation</p> <p>(b) Explicit Consent</p>

## Marketing:

### Promotional offers from us

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

If you are a landlord, we will send to you regular emails detailing relevant statistics about your property or properties marketed by Sugarhouse, this does not constitute marketing.

As a tenant, we may send to you regular emails containing property bulletins, to inform you of available properties that are relevant to your search activity. This does not constitute marketing.

You will receive communications from us if you have requested information from us. You may also receive communications if you have purchased services from us, if you provided us with your details when you entered a competition, registered for an account with us, instructed us to advertise a property, and/or proceeded to our site via channels such as Facebook, Google, Bing and/or another analytical advert. In any case, we will continue to contact you until such time where you opt out or there is no legitimate interest to do so.

### Third-party marketing

We will obtain your explicit opt-in consent before we share your personal data with any company outside of Sugarhouse (Leeds) Ltd or Flexi-Bill Ltd

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting our office, or emailing SAR@sugarhouseproperties.co.uk

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us, as a result of entering into a contract or agreement with us, as a tenant, guarantor or landlord, listing a property with us, or having purchased a service or other transaction from us.

### 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 our website may become inaccessible or not function properly. For more information about the definition of cookies, please refer to the glossary.

### Information about our use of cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.



- Strictly necessary cookies; These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- Analytical/performance cookies; They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies; These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies; These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Purpose
	Stores your user identification to allow you to be logged in automatically next time you visit
	Stores a password token to allow you to be logged in next time you visit (does not store your password)
	Stores the fact that you arrived at our site from an advert elsewhere online
	Stores the fact that you have read and closed our cookie notice
	Stores the fact that you have completed or hidden one or more surveys whilst on the site
	Stores the fact that you have signed up as a new user
Google Analytics	Used to enable us to target advertising to students who visit our site. You can read more information on the cookies used by Google Analytics by visiting <a href="#">Google's help pages</a>

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

With regards to Google Analytics, Google have their own [opt out page](#) which you can access using [this link](https://www.sugarhouseproperties.co.uk/privacy.php). <https://www.sugarhouseproperties.co.uk/privacy.php>. This provides visitors with the ability to prevent their data from being used by Google Analytics.

Except for essential cookies, all cookies will expire after 30 days.

Change of purpose:

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that the need to use it for another reason, so long as that reason is compatible with the original purpose that the data was collected. 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.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the reason for sharing the data along with the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### 5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes detailed in the table within section 4 of this policy. We may also share your personal information with Flexi-Bill Ltd when entering a bills included package. We will not sell any personal information of yours that identifies you or allows you to be contacted by other third parties without your consent.

We may disclose your personal information to following third parties:

- Internal Third Parties such as IT and system administration services. This will also include any group company that we may merge with and/or utilise in the future. You will be notified of such changes if and when they occur.
- Our property management software.
- External Third Parties;
  - Business partners, suppliers, sub-contractors and other third parties for the performance of any contract we enter into with them or you and for the provision of our service
  - Landlords of properties advertised with Sugarhouse Properties, when you make a property enquiry, viewing request, request to book or any other similar enquiry
  - Third parties to whom we pass anonymised aggregated market data (for example, average house price in postcode prefix LS).
  - Analytics and search engine providers that assist us in the improvement and optimisation of our website.
  - Service providers based in the UK who provide IT and system administration services, including payment services such as facilitating card payments or direct debits (details of specific service providers can be obtained by contacting us if requested at any time).
  - Professional advisers lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
  - HM Revenue & Customs, regulators and other based in the UK who require reporting of processing activities in certain circumstances.
  - Housing Hand Ltd when you choose to use their guarantor service
  - The Dispute Services Ltd when your tenancy deposit is protected by your landlord
  - Residential Landlords Association (RLA), whom we use to carry out credit check or full employment reference performed on you as a tenant or guarantor, for the purpose of assessing your creditworthiness.
  - FlexiBill Ltd to facilitate a bills included package on a property marketed on a let only basis, at the landlords or tenants request.
  - Yorkshire Water, TV licensing, Leeds City Council, any energy, broadband or utility companies, for the purpose of administering the provision of utility services to the property address under contract.

If due to your financial circumstances, tenancy and/or letting arrangements and a landlord finds it necessary to request; we will undertake a credit reference check, the report shall be made available to the landlord once we have received it from the third-party supplier. This is in order that a suitable product, service or offer can be provided to you.

If required under a legal obligation, contractual obligation or if it is in Sugarhouse's, tenant's, landlord's or guarantor's interests to do so (i.e. to facilitate and administer tenancy arrangements or service

provision), we reserve the right to disclose all such personal data to third parties (including credit reference agencies).

A third party may:

- conduct any searches or investigations as may be considered necessary or desirable in order to determine the creditworthiness of such person and to prepare a Credit Reference Report in relation to them in order that we can perform our contractual obligations, or when it is in a party's legitimate interests to know such information; and
- record that any such searches or investigations have been made.
  
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets with.

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 is set out in this ~~privacy~~ notice.

We require all of our carefully selected 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 this policy.

#### 6. International transfers:

In the instance of a landlord being based outside the EEA (European Economic Area), to fulfil our contract with them your personal data will involve a transfer of data outside the EEA.

Credit/debit or bank card details are not stored by Sugarhouse Properties, card receipts are securely disposed of using a recognised BS EN 15713 company.

Card payments are processed and managed by FCA regulated third party payment providers. If you require details of these third parties, please contact us.

Bank account details are stored securely on our property management software.

If we need to transfer your personal data outside of the EEA, we ensure a similar degree of protection is afforded to it by ensuring that at least one of the following safeguards is met or a derogation applies:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use providers based in the U.S.A, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the U.S.A. In the absence of an adequacy decision, or of appropriate safeguards including binding corporate rules, a transfer or a set of transfers of personal data to a third country or an international organisation shall take place only on one of the following conditions:
  - You have explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards; or
  - the transfer is necessary for the performance of a contract between you and us (as data controller) or the implementation of pre-contractual measures taken at your request;

- the transfer is necessary for the conclusion or performance of a contract concluded in your interests, between Sugarhouse Properties (as the data controller) and another natural or legal person;
- the transfer is necessary for the establishment, exercise or defence of legal claims;
- Where a transfer could not be based on any of the above conditions, a transfer to a third country or an international organisation may take place only if the transfer is not repetitive, concerns only a limited number of individuals, is necessary for the purposes of compelling legitimate interests pursued by Sugarhouse Properties which are not overridden by your interests or rights and freedoms. We will also assess all the circumstances surrounding the data transfer and provide suitable safeguards with regard to the protection of personal data.

Please contact us if you would like further information on the specific mechanism used by us when transferring your personal data out of the EEA.

#### 7. Data Security:

We have appropriate security measures in place 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 place procedures to deal with any suspected data breach. This includes a provision to and will notify you and any applicable regulator of a breach where we are legally required to do so in the event of a data breach.

#### 8. Data retention:

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collect it for. This includes for the purposes of satisfying and 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 along with the applicable legal requirements.

In some circumstances, we may anonymise your personal data (so that it cannot be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

#### 9. Your legal rights:

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Be aware that in some capacities, we may act as a data processor, and in this capacity, we may not be able to comply with the following requests. However, we will inform the relevant data controller of your request and assist them as required under GDPR.

You also have the following rights;

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

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, though we may need to verify the accuracy of the new data you provide to us.

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. 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 information unlawfully or where we are required to erase your personal data to comply with local law. Please 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 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 overrides your rights and freedoms.

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. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

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. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us via email to: [SAR@sugarhouseproperties.co.uk](mailto:SAR@sugarhouseproperties.co.uk)

#### Fees'

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we reserve the right to charge a fee £12 if your request is clearly unfounded, repetitive or excessive. Alternatively, we reserve the right 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 calendar month from the date of receipt. Your request will be acknowledged within 24 hours of delivery. Occasionally it may take us longer than this time if your request is particularly complex or where you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Glossary

### 'LAWFUL BASIS'

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Explicit consent means processing your data only when we have your express consent to do so.

### Cookies

What is a cookie?

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

### Where we store your personal data

Please note that we store your data on a secure third party property management software.

Please note that where you have registered on our website and chosen a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share this password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### Uses made of the information

We use information held about you in the following ways:

- Information you give to us. We will use this information:
  - to carry out our obligations arising from any contracts or other arrangements entered into between you and us and to provide you with the information, products and services that you request from us;
  - to facilitate any contracts or other arrangements entered into between you and a third party via our offices or web site (including for the avoidance of doubt any Assured Shorthold Tenancy, Licence or other Agreement to occupy or any bills included packages) including effecting credit reference checks and facilitating payments, and to carry out our obligations arising from or in relation to such Third Party Contracts.
  - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) and telephone with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on any form on which we collect your data;
  - to notify you about changes to our service;
  - to ensure that content from our site is presented in the most effective manner for you and for your computer or device.
  - carry out external market analysis;
  - to allow you to participate in interactive features of our service when you choose to do so.
  - if you are a landlord, letting agent, or other business/advertising user, to send to you a weekly e-mail detailing relevant statistics surrounding your property or properties.
  - if you are a tenant or guarantor, to contact you via email, SMS, telephone and post to notify you if the rent due under an agreement has fallen into arrears.
- Information we collect about you. We will use this information:
  - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - carry out external market analysis;
  - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
  - to allow you to participate in interactive features of our service, when you choose to do so;
  - as part of our efforts to keep our site safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you.
- Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

#### Disclosure of your information

We will not sell any personal information of yours that identifies you or allows you to be contacted by third parties without your consent.

We may share your information with selected third parties including:

- Third party sellers who publish quotes, offers and similar information about their products and/or services on our website or in our office to enable them to contact you about such products and/or services, if requested by you;
- Business partners, suppliers, sub-contractors and other third parties for the performance of any contract we enter into with them or you or for the provision of our service to you or in connection with a Third Party Contract.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you or a Third Party Contract.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Sugarhouse (Leeds) Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [Terms of Use Policy](#) or [Terms and Conditions](#) and other agreements or to protect the rights, property, or safety of Sugarhouse (Leeds) Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## Your Rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us by email to [optout@sugarhouseproperties.co.uk](mailto:optout@sugarhouseproperties.co.uk).

Our site may, from time to time, contain links to and from other external websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## Access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act.

## Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## Contact

We welcome comments, questions, feedback and requests regarding our site and this privacy policy and these should be communicated to us via email to [SAR@sugarhouseproperties.co.uk](mailto:SAR@sugarhouseproperties.co.uk)