

# PRIVACY POLICY

Carmel Gate is committed to protecting your personal data and respecting your privacy. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you. It describes the types of information we may collect from you or that you may provide to us when we engage with you.

By using our Services, you agree to this Privacy Policy.

## CONTROLLER

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

## IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT ACCESS OR USE OUR SERVICES

### 1. Information we collect from you

We collect several types of information about visitors and/or users of our Services. We use different methods to collect data from and about you including through:

a) **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:

- apply for our products or services;
- when you contact us through our website.
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

b) We may collect this information either directly when you provide it to us or we will collect and process your personal data when you engage us **to deliver a Service/open a file or send us communication. Personal data we collect may include the following:**

- **Identity Data** includes [first name, maiden 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].
- **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 this website].
- **Profile Data** includes [your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses].
- **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].

- c) We would also collect personally identifiable information about your online activities over time and across third party websites or online services. Every time you visit our website we automatically collect the following information:
- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet; and
  - information about your visit.

## **2. Where we store data**

By submitting your personal data, you agree to the transfer, storing and processing of your data which may include outside of the country where you reside. To provide services to its customers and for internal purposes, Carmel Gate operates various systems to administer client data and data related to the matters it handles for its clients. The personal data that we collect from you may be transferred to, used, stored or processed at a destination outside of the EEA. It may also be transferred, used, stored or processed by staff operating outside the EEA who work for us, or one of our employees or suppliers. We will take reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

## **3. How we use your information**

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:

- To carry out our obligations arising from any contracts entered between you and us, including for tenancy agreements, billing and collection.
- 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.
- To provide you with information, products or services that you request from us or which we feel may interest you.
- To contact you about our Services.
- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- In any other way we may describe, when you provide the information or when we prompt you regarding a new use of information about you.

### ***How we will use information about you that 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.

## **4. Disclosure of Your Information**

We will share your personal data with third parties only in the ways that are described in this Privacy Policy. We do not sell, trade, rent or disclose your information to others, except as provided herein:

- a) We provide and support some of our Services through contractual arrangements with service providers and other third parties. We and our service providers use your personal data to deliver our Services.

- b) We will also disclose personal data in the following circumstances:
- i. if it is required by law enforcement or judicial authorities, or to cooperate with a law enforcement investigation;
  - ii. if we have a good faith belief that we are required or permitted to do so by law or legal process;
  - iii. to protect our rights, reputation, property or the safety of us or others;
  - iv. to defend or enforce our rights or your obligations;
  - v. if the disclosure is required by mandatory professional standards;
  - vi. to a third party with your prior consent to do so;
  - vii. if we are under a duty to disclose or share your personal data in order to enforce or apply any contracts or agreement that may exist between you and us including this Privacy Policy, our Engagement Letter and our Terms of Service - this includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;
  - viii. if we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets; or
  - ix. if we or substantially all of our 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.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 5. Updating or Correcting Your Personal Data

We offer settings to control and manage the personal data we have about you, including the ability to:

- **Delete Data:** You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Services to you).
- **Amend or Rectify Data:** You can edit some of your personal data through your account. You can also ask us to amend your data in certain cases, particularly if it is inaccurate.
- **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
- **Right to Access and/or Take Your Data:** You can ask us for a copy of your personal data and can ask for a copy of personal data you provided in machine readable form.

You can learn more about how to make these requests in Sections 6 and 7 of this Privacy Policy. You may also contact us using the contact information in Section 13, and we will consider your request in accordance with applicable laws.

You may access, request deletion, and correct your personal data by submitting a data request by writing to us at the addresses at the end of this Privacy Policy.

## 6. Closing Your File or Deleting Your Personal Data

You may choose to close your file in which case we will delete your information. However, we may retain your personal data even after you have closed your file if reasonably necessary to comply with our legal obligations (including law enforcement requests), comply with contractual obligations, meet regulatory requirements,

resolve disputes, maintain security, prevent fraud and abuse, enforce our Terms of Service and Engagement Letter.

## **7. Choices Regarding Control of Your Personal Data**

If you would like to access the information that we have about you, please write to us at the address at the end of this Privacy Policy. You can also ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., your personal data is inaccurate or unlawfully held) by submitting a data request by writing to us at the address at the end of this Privacy Policy.

You can ask us for a copy of your personal data in machine readable format. If you have questions on this process, please contact us by submitting a data request by writing to us at the address at the end of this Privacy Policy, and we will consider your request in accordance with applicable laws.

## **8. Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Also, by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for **six** years after they cease being customers for **tax** purposes.

## **9. Lawful Bases for Processing**

We will only collect and process personal data about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g., to deliver the Services you have requested) “legitimate interests,” and any legal obligation required to process your personal data.

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful basis upon which we collect and use your personal data, please contact us at the address below.

## **10. Information Related to Data Collected Through Other Controllers**

For most of our services we collect information directly from you and verify your identity, however for certain services, we collect information under the direction of our clients (e.g., an entity that subscribes to the Services for use by the entity’s personnel). In this respect, we act as a data processor under applicable laws. We will retain and use this personal data as necessary to comply with our legal obligations, resolve disputes, and fulfil our obligations under those agreements with the data controllers. In these cases, the data controller will have its own privacy policy that applies to your data, including personal data.

## **11. Data Security**

We are committed to protecting the security of your personal data. We use a variety of technical, physical and procedural safeguards to protect your data from unauthorised access, use or disclosure. 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.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, you acknowledge that: (a) there are security and privacy limitations of the Internet which are beyond our control; (b) the security, integrity and privacy of any and all information and data exchanged between you and us through this Website cannot be guaranteed and we shall have no liability to you or any third party for loss, misuse, disclosure or alteration of such information; and (c) any such information and data may be viewed or tampered with in transit by a third party.

In the unlikely event that we believe that the security of your personal data in our control may have been compromised, we will try to notify you. 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. To the extent that you have provided us with your email address, we may notify you by email and you agree to our use of email as a means of such notification. If you prefer for us to use another method to notify you in this situation, please contact us at the address at end of this Privacy Policy with the alternative contact information you wish to be used.

## **12. Cookies and Other Technologies**

When you use our Website, we use cookies and other technologies to facilitate and customise your use of our Services and to distinguish you from other users of our website. Please visit our website for our cookie policy.

## **13. Direct Marketing**

We would not share personal data with third parties for their direct marketing purposes without your permission.

## **14. How do you Contact Us With Questions?**

If you have questions or complaints regarding this Privacy Policy, please first contact by physical mail or email at the addresses below.

Address:

557 Pinner Road, North Harrow, Middlesex, HA2 6EQ

Email:

[management@CarmelGate.com](mailto:management@CarmelGate.com)

## **15. Complaints**

We seek to resolve directly all complaints about how we handle your personal information, but you also have the right to lodge a complaint with the Information Commissioner's Office at:

Wycliff House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone-0303 123 1113(local rate) or 0162505450745

Website: <https://ico.org.uk/concerns>