

# PROPERTY INFORMATION PRODUCTS

## PRIVACY STATEMENT

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### 2 INTRODUCTION

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Property Information Products (“PIPS”) (“we”, “us”, or “our”) is committed to protecting and respecting the personal data that we hold. This privacy statement describes why and how we collect and use personal data, as well as provides information about individuals’ rights. It applies to personal data provided to us, both by individuals themselves and/or by others. We may use personal data provided to us for the purposes described in this privacy statement or as made clear before collecting personal data.

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose are set out in the relevant sections below.

The personal data that is provided to us is provided either directly from the individual concerned, from a third party acting on behalf of an individual, or from publicly available sources (such as internet searches, Companies House).

Where we receive personal data that relates to an individual from a third party, we request that this third party inform the individual of the necessary information regarding the use of their data. Where necessary, reference may be made to this privacy statement.

We reserve the right to update this policy from time to time, so please review this document regularly in order to stay up to date.

## 3 SECURITY

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We take the security of all the data we hold seriously. Staff are trained on data protection, confidentiality and security.

We have a framework of policies and procedures which ensure we regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Any payment transactions or details will be encrypted using SSL technology.

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 sites; 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.

## 4 DATA THAT WE HOLD

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### 4.1 CLIENTS

We process personal data in relation to individuals who use our services.

#### 4.1.1 Why do we process data?

There are several reasons why we will process the personal data that an individual may provide to us when visiting our websites. As examples, these include;

- **Functionality.** To allow individuals to use some functionality of our website, certain personal data must be entered for features to work as intended.
- **Security.** To keep our site safe and secure, we may sometimes collect personal data, for instance login information and other data that can be used to vouch an individual's identity.

The data we collect depends on which of our services you are using, and is used for the following purposes (but is not limited to);

- To confirm your identity
- To tailor your website experience based on your property preferences
- To advise you of services we provide
- To send you requested information regarding property packs

#### 4.1.2 What data is processed?

All data that is processed is necessary for the functionality of our service, and the data that we hold depends on what data was entered and for what purpose.

Where data was entered to engage with functionality of our website, that personal data may include a name, address, e-mail address and phone/mobile number, financial and credit card information, business address and name.

Where data is collected automatically, the data that we may collect includes technical information, including the Internet protocol (IP) address used to connect an individual's computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

Other data about an individual's visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

Our website uses cookies to distinguish individuals from one another. This helps us to provide a better experience when individuals browse our website and allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

#### 4.1.3 How long do we hold data for?

We retain the personal data processed by us in a live environment for as long as is considered necessary for the purpose(s) for which it was collected (including as required by applicable law or regulation). We may keep data for longer to establish, exercise, or defend our legal rights and the legal rights of our clients.

Personal data is held for a minimum of 6 years from the last time an individual accesses the legal documents for a property. This data is kept in the event that a regulatory body or estate agent requests the legal document access history of an individual.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

By agreeing to this policy you are consenting to us processing your data for the minimum periods specified above; please do not proceed to use any of our services if you disagree with the respective retention period.

## 4.2 OUR PEOPLE

We collect personal data for our people as part of the administration, management and promotion of our business activities.

Our staff handbook explains further how personal data is held for our staff and partners.

### 4.2.1 Applicants

Where an individual is applying to work for PIPs, personal data is collected through the application process.

There are several purposes that personal data for applicants are collected.

- **Employment.** We process an applicant's personal data to assess their potential employment at EIG.
- **Administration and management.** We may also use this personal data to make informed management decisions and for administration purposes.

Personal data collected for applicants is held for as long as necessary to fulfil the purpose for which it was collected, or for a maximum of two years where those purposes no longer become necessary.

## 5 PEOPLE WHO USE OUR WEBSITE AND MOBILE APPS

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When people visit our websites, personal data is collected both through automated tracking and interacting with various forms on the websites or apps (collectively referred to as the websites).

Personal data may be collected when individuals fill in forms on our websites or by corresponding with us by phone, e-mail or otherwise. This includes information provided when an individual registers to use our website, subscribes to our services, makes an enquiry, comments on publications, partakes in a promotion or survey, applies to work for PIPs, and reports a problem with our website.

When individuals visit our website, certain personal data may be automatically collected.

Often, individuals who visit our website additionally fall into another category as listed by this privacy statement. For instance, users of our websites may be current subscribers. Where this is the case, data held and processed for individuals who use our website may also become data that is held and processed for another purpose.

## 6 SHARING PERSONAL DATA

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We will only share personal data with others when we either have your clear consent to do so or are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

*Third party organisations that provide applications/functionality, data processing or IT services to us*

We use approved third parties to support us in providing our services and to help provide, run and manage our internal IT systems. The servers powering and facilitating that cloud infrastructure are in secure data centres within the European Economic Area (EEA) and personal data may be stored in any one of them.

*Law enforcement or regulatory agencies or those required by law or regulations*

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

In addition to the above, in order for you to gain access to a specific estate agents' legal documents it is necessary that the relevant agent has access to your personal data. We will never transfer your information in this way without your consent, however it is a requirement for you to offer it voluntarily if you want to access a particular property pack. The estate agent may therefore also use your data to contact you with their related news and services.

## 7 LOCATIONS OF PROCESSING

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Where possible, personal data resides within the EU territory but may be processed by staff operating outside the EEA who work for us or for one of our suppliers. We will take all reasonable steps to ensure that your data is treated securely, in accordance with this privacy statement.

We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EU are done lawfully. Where we transfer personal data outside of the EU to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU.

In particular, whenever we transfer and/or process personal data outside of the EU, we ensure that a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in the EU; and/or
- Where we use service providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to that afforded in the EU to data shared between the EU and the US.

## 8 INDIVIDUAL'S RIGHTS

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Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller. Please request a Data Subject Access Form by emailing [dpo@piphome.co.uk](mailto:dpo@piphome.co.uk) if you wish to do so.
- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data.
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email to [dpo@piphome.co.uk](mailto:dpo@piphome.co.uk).

## 9 COMPLAINTS

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We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to [dpo@piphome.co.uk](mailto:dpo@piphome.co.uk). We will investigate and respond to any complaints we receive.

You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

## 10 DATA CONTROLLER AND CONTACT INFORMATION

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If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

[enquiries@piphome.co.uk](mailto:enquiries@piphome.co.uk)

Unit 3B  
Birchfield Way  
Telford  
Shropshire  
TF3 5BZ

## 11 CHANGES TO OUR PRIVACY STATEMENT

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Updates to this privacy statement will appear on this website. This privacy statement was last updated on 19/10/2020.

