

Welcome to the Cowry Property Ltd privacy notice.

Cowry Property Ltd respects your privacy and is committed to protecting your personal data.

This privacy notice will inform you as to how we look after your personal data when you visit our website, <http://www.cowryproperty.com>, (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

## 1. Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and processes your personal data through your use of our site, including any data you may provide through our site when you sign up to our newsletter or brochure, purchase a product or register an account with us.

This site isn't intended for children and we don't knowingly collect data relating to children.

It's 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're collecting or processing personal data about you so that you are fully aware of how and why we're using your data.

This privacy notice supplements any other notices given and isn't intended to override them.

### 1.1. Data Controller

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

We have a Data Control Officer (DCO) 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 Marty Stevenson using the details set out below.1.2. Our Contact details Are:

### 1.2. Our Contact Details are:

Full name of legal entity: Cowry Property Ltd

UK Company number: 11630516

Name or title of DCO: Marty Stevenson

Email address: [marty@cowryproperty.com](mailto:marty@cowryproperty.com)

Postal address: 21 Kingswood Avenue, Jesmond, Newcastle upon Tyne, NE2 3NS

Telephone number: 07717435460

Should you have any concerns, we'd appreciate the chance to deal with them in the first instance.

If you'd like to speak to us in relation to any concerns you have, please contact us either by:

Email: at [marty@cowryproperty.com](mailto:marty@cowryproperty.com) - Or- Telephone: on 07717435460

### 1.3. Making a Data Subject Access Request

A Data Subject Access Request form may be downloaded from our web site location:-

<http://www.cowryproperty.com/wp-content/uploads/Cowry-GDPR-Request-Submission-Form.pdf>

Please complete it and return it to us.

### 1.4. Information Commissioner's Office

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](http://www.ico.org.uk)).

### 1.5. Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 27/5/2019 and can be obtained by contacting using paragraph 1.2.

It's important that the personal data we hold about you is accurate and current. So please keep us informed if your personal data changes during your relationship with us.

### 1.6. Third-party links

This website includes links to third-party websites, plug-ins and applications such as Facebook, Twitter Instagram and LinkedIn. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We don't 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 uniquely 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 that you give us through our site or by using our applications, corresponding with us by phone, e-mail or otherwise about you which we have grouped together as follows:

- Identity Data includes first name, middle name, maiden name, last name, username or similar identifier.
- 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 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.
- Usage Data includes information about how you use our site and products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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 isn't 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 page, newsletter or other 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.

We don't 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).

Nor do we collect any information about criminal convictions and offences.

### 2.1. If you decide not 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 decide not to provide that data when requested, then 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).

In this case, we may be unable to process an order for a product or we may have to cancel a product you have ordered with us but we will notify you at the time, if this is the case.

### 3. How is your personal data collected?

By direct interactions with you mainly ...

- You may give us your Identity, Contact and Financial Data by
  - Offering us proof of funds
  - filling in forms
  - signing documentation
  - Or... by corresponding with us by post, phone, email or otherwise.
- This includes personal data you provide when you;
  - subscribe to our newsletter;
  - request marketing to be sent to you;

- give us some feedback
- 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.
  - We may also receive Technical Data about you if you visit other websites employing our cookies.
  - Please see below for further details on cookies
- Third parties or publicly available sources.
- We may receive personal data about you from various technical third parties as set out below:
  1. analytics providers such as Google based outside the EU;
  2. advertising networks such as AdSense based inside and outside the EU.
  3. Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the EU.
  4. Identity and Contact Data from data brokers or aggregators.
  5. Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

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

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

- where we need to perform the contract we're about to enter into
- or... have entered into with you;
- where It's necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights don't override those interests;
- where we need to comply with a legal or regulatory obligation;
- and... to the purchaser (or prospective purchaser) of any business or asset that we are (or contemplating) selling.

Generally, we don't 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.

##### 4.1. Purposes for which we will use your personal data

We have set out in 4.1.1 below, in 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 (please see paragraph 10 (Glossary) for a definition of legitimate interest).

#### 4.1.1. Purposes for which we will use your personal data

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you (please see paragraph 10 (Glossary) for a definition of performance of a contract)
To process and deliver your order including:(a) Manage payments, fees and charges(b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:(a) Notifying you about changes to our terms or privacy policy(b) Asking you to leave a review, feedback or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(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 products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(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 reorganisation or group restructuring exercise) b) Necessary to comply with a legal obligation (please see paragraph 10)

		(Glossary) for a definition of comply with a legal or regulatory obligation)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	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)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

#### 4.2. Marketing Purposes

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

#### 4.3. Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to market what we think you may want or need, or what may be of interest to you. You will receive marketing communications from us if you have requested information from us or purchased goods from us and, in each case, you have not opted out of receiving that marketing.

#### 4.4. Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside of Cowry Property Ltd for marketing purposes.

#### 4.5. Opting out

You can ask us or third parties 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 won't apply to personal data provided to us as a result of a product purchase, warranty registration, product experience or other transactions.

#### 4.6. 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.

#### 4.7. About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies don't typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

#### 4.8. Our cookies

We use cookies on our website to recognize a computer when

- a user visits the website
- to track users as they navigate the website

- to enable the use of a shopping cart on the website
- to improve the website's usability
- to analyse the use of the website
- to administer the website
- to prevent fraud and improve the security of the website
- to personalise the website for each user

#### 4.9. Blocking cookies

Most browsers allow you to refuse to accept cookies; for example:

- Internet Explorer (version 10): you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
- Firefox (version 24): you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites";
- Chrome (version 29): you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you won't be able to use all the features on our website

#### 4.10. Deleting cookies

You can delete cookies already stored on your computer; for example:

- Internet Explorer (version 10): you must manually delete cookie files (you can find instructions for doing so at <http://support.microsoft.com/kb/278835>);
- Firefox (version 24), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history", clicking "Show Cookies", and then clicking "Remove All Cookies";
- Chrome (version 29), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Delete cookies and other site and plug-in data" before clicking "Clear browsing data".

Deleting cookies will have a negative impact on the usability of many websites.

#### 4.11. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. 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'll notify you and we'll explain 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, but only 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 set out in the table in paragraph 4 above.

- Internal third parties such as our employees or officers and legal entities within Cowry Property Ltd.
- External third parties including specialist IT support, suppliers and sub-contractors for the performance of this site, our applications and any contract we enter into with them or you including : Web site
- Estate Agents, property letting Agents or Finance Agents
- Delivery companies to deliver you order (such as Hermes, Yodel and Royal Mail),
- 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 notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We don't 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

In the course of our operations we may need to transfer your data outside the European Economic Area (EEA) for the purposes of backups or due to web hosting arrangement.

Countries to which we may transfer your personal data outside of the EEA don't have an adequate level of protection for personal data by the European Commission. However, where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

For further details, see European Commission: Model contracts for the transfer of personal data to third countries. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the 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're 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.

Your personal data will be stored for no longer than 9 months following you ceasing to be registered with us as a customer of the site.

If you have registered to receive communications from us as part of our mailing list, then we will keep your personal data for 2 years, at which time we will seek to obtain consent from you to continue storing your data and contacting you. If this isn't received, we will automatically delete your personal data at that time.

## 9. Your legal rights

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

### 9.1. Marketing

We will inform you (before collecting your data) if we intend to use your data for marketing purposes. We will only use your data for this if you have agreed in advance.

## 9.2. Correction of information

If you notify us that the personal data we hold is complete or inaccurate we will correct or complete the information as soon as possible.

## 9.3. Deletion of information

You have the right to request that your personal data be deleted; including if we no longer need it for the purpose we collected it, or you withdraw your consent.

Following such a request we will erase your personal data without undue delay unless continued retention is necessary and permitted by law. If we made the personal data public, we will take reasonable steps to inform other data controllers processing about your erasure request.

## 9.4. Object to processing

You have the right to object to us processing your personal data where we're 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're 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 override your rights and freedoms.

## 9.5. Restriction on processing

You have the right to request that we suspend processing your personal data, but hold it for you, in the event the personal data we hold is inaccurate, the processing is unlawful or we no longer need the personal data. Once the processing is restricted, we will only continue to process your personal data if you consent or we have another legal basis for doing so.

## 9.6. Access to information

You have the right to access information held about you and any access request will usually be free of charge. We will endeavour to provide information in a format requested, but we may charge you a reasonable fee for additional copies.

### 9.7. Data Portability

You have the right to receive a copy of your personal data which you gave to us. The copy will be provided in a commonly used and machine-readable format. You can also have it transmitted directly from us to another data controller, where technically possible.

If you wish to exercise any of the rights set out above, please Contact us.

### 9.8. No fee usually required

You won't 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.

### 9.9. Withdraw consent at any time

You may withdraw your consent at any time where we're relying on consent to process your personal data. However, this won't 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.

### 9.10. 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 isn't 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.

### 9.11. 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.

## 10. GLOSSARY : LAWFUL BASIS Processing Terms

### 10.1. 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 don't 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.

### 10.2. Performance of Contract

Means processing your data where it's 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.

### 10.3. Comply with a legal or regulatory obligation

Means processing your personal data where it's necessary for compliance with a legal or regulatory obligation that we're subject to.