

## **Strawberry Property and Hanstone Privacy and Cookies Policy**

Our Privacy Policy is updated from time to time, so please check our website regularly to ensure you are fully up-to-date with how we deal with the information you have provided to us.

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### **EMAIL**

Our emails are intended solely for the named addressee and may contain confidential information. If you have received a message in error, please send it back to us, and immediately and permanently delete it; do not use, copy or disclose the information contained in our message or in any attachment.

Although reasonable precautions are taken to ensure our emails and any attachments are free from viruses, we make no representation or warranty as to the absence of viruses. Recipients should therefore scan emails and attachments for viruses; we cannot be held responsible for any failure to do so. If an email contains reference to properties for sale or rent, it remains subject to contract and non-binding at all times.

Our views on price are not intended as a formal valuation and should not be relied upon as such by the recipient or any third party unless and to the extent specifically stated otherwise by us.

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### **GENERAL**

Hanstone Development is Development of 10 houses being built by Strawberry Property Limited, Unit 5, Stoke View Business Park, Stoke View Road, Fishponds, Bristol, BS16 3AE. Where you interact with our office, for example to arrange a viewing or wish to discuss your property, please note that the office you liaise with will be a Data Controller of your Personal Data where this is collected from you by them.

This Privacy Policy explains what information we collect about you and when you visit our website, register to use our site and use our services and how we handle your information to ensure we protect your rights. Please read this Privacy Policy carefully to understand how we will treat your Personal Data.

For the purposes of this Hanstone Privacy Policy in relation to where you provide to us, your Personal Data in connection with your relationship with us our Office is the "Data Controller" of your personal data. For Personal Data collected via the Website without a relationship being in place, Strawberry Property will also be the Data Controller of your Personal Data.

This is because we are the organisation which (either acting alone or jointly with others) determines why and how your Personal Data is processed. By Personal Data, we mean information which, either by itself or when combined

with other information that we hold or which is available to us, can be used to identify you, such as your name and address.

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## WHAT WE COLLECT

We collect certain information or data about you. The data that we collect will be in the form of:

- questions, queries or feedback you leave, including your contact details such as name, personal or work-related email address if you contact us online via the Hanstone Website or where you call us or visit us direct;
- how you use the Hanstone website - for example which links you click on, your IP address and details of which version of web browser you used;
- information on how you use the site, using cookies and page tagging techniques which include information about your Internet Service Provider, your operating system, browser type, domain name, the Internet Protocol (IP) or MAC address of your computer (or other electronic Internet-enabled device), your access times, the Hanstone page that brought you to us, the web pages you request and the date and time of those requests.

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## WEBSITE REGISTRATION FORMS

We have a registration form on our website to enable visitors to interact with our staff. This form allows visitors to our website to get in touch with our office and arrange a viewing of a property. In each case, the form completed by the visitor will be emailed directly and only to the Strawberry Property office.

We will never ask you to provide any 'Special Categories of Personal Data' when using the Hanstone Website. This means information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, and data concerning your health, sex life or sexual orientation. We do not consider any of this information relevant to what we do via the Hanstone Website. However, there may be some rare and limited instances where we will collect this type of information from you, where you choose to provide it to us, in connection with your relationship with us. Where this occurs we will ensure that we do so with your explicit consent and in accordance with applicable data protection laws.

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## HOW WE RECEIVE YOUR INFORMATION

The information that we hold may be supplied by you directly to us by telephone, office visit, e-mail or via our website registration form. We may also have information that has been supplied to us by third parties for marketing

purposes where you have selected to have your information shared in this way. This may be where you have signed up to or made an enquiry through Facebook or Instagram and your information is passed to us in connection with a property you are interested in, on that portal but which is managed by Strawberry Property.

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## **WHY WE NEED YOUR INFORMATION**

Strawberry Property collect and use your personal data, so that we can:

- Contact you;
- Register you to receive our services and provide you with our services;
- Analyse your personal preferences and personalise our services to you;
- Reply to any requests for information that you ask us for;
- Clarify any particular query;
- Resolve any problems with services that we may supply to you;
- Manage your account;
- Supply details of any product or service within Strawberry Property that we believe may meet your needs;
- Cross check any information that we receive with that held on our database; and
- Serve marketing information or updates about market conditions on a regular basis which we feel would be of interest or use to you.

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## **HOW WE MAY USE THIS INFORMATION:**

We primarily use your information in order to provide our services to you which include the following:

- Helping you to buy a property;
- Helping you rent a property;
- To store your data to pre-populate fields to make it easier for you to provide information when you return to the Hanstone and Strawberry Property websites;
- To communicate with you, including sending you information about products and services which we think may be of interest to you. You will be able to opt-out of such communications at any time; this can be done by contacting us by email, phone, or in person to confirm you would like to opt-out.
- To validate your information
- To comply with any legal obligation to which we are subject;
- Providing strategic advice in relation to a number of property matters.
- Referring your details to a third-party reference checking service in order to let a property to you; or
- Referring your details to a third-party inventory clerk

Please note that the provision of some of these services will be subject to further terms and conditions. Please ensure you read the relevant documentation in connection with a particular service, where this is provided to you, so that you understand how your information will be used for that particular service.

We use IP addresses to gather statistical information and to track visitor behaviour on our website. This allows us to retarget people through other forms of online advertising and to provide our website visitors with the most relevant sources of information that we can. We also use this information to carry out programmatic marketing which allows us to target our advertising, we do this via the use of cookies, please refer to our cookies policy below for more information.

We sometimes run marketing campaigns which use the data we collect to target Hanstone or Strawberry Property banners and adverts to you when you are on certain other websites (this is known as Digital Marketing Re-targeting). We do this by using a range of digital marketing networks and advert exchanges, and advertising technologies such as pixels, ad tags, cookies, and mobile identifiers. The banners and adverts you are served will be based on your previous visits to our website and which pages you landed on or clicked on.

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## OUR LEGAL BASIS FOR PROCESSING YOUR INFORMATION

The legal basis which relates to our use and other processing of your Personal Data under applicable Data Protection Laws may include (as relevant):

- Processing that is necessary for performance of a contract: This includes such things as administering and managing your account where you either sign up online with us, on the phone or in person and the services relating to that;
- Processing that is necessary for our own legitimate interests or those of third parties – such as:
  - for management and audit of our business operations;
  - for market research and analysis, developing statistics; and
  - for our own direct marketing communications which we send to you about our own products and services.
- Processing that is necessary to comply with a legal obligation – such as:
  - to process your request for Personal Data or when you seek to exercise your rights under Data Protection Laws; or
  - for compliance with legal and regulatory requirements.
- Processing that is based on your consent – such as:

- When we collect your data for our direct marketing communications about products and services available from Hanstone or Strawberry Property or from other third parties such as Goodlord.
- Where in very limited circumstances you provide us with special categories of data.

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## **WHO DO WE SHARE YOUR INFORMATION WITH?**

Strawberry Property will share your data with the following category of recipients:

- Financial companies such as banks, where you ask us to arrange a mortgage for you or do a credit check;
- Professional advisers;
- Our service providers who process and store data on our behalf;
- Third party testimonial gatherers;
- Third party e-communication providers
- Third party tenant referencing companies
- Various contractors who require your information to carry out a service which will aid in the sale or let of your property such as inventory clerks, gas engineers, professional photographers etc;.
- At certain times we ask our clients to provide online testimonials or reviews about the service they have received from Strawberry Property.

We will not share your Personal Data with any other organisations for marketing outside of those listed above, market research or commercial purposes. We may share your personal data in the event that our business, or substantially all of its assets are acquired by a third party, (in which case personal information about players or marketing prospects might be one of the transferred assets).

At times, we pass on 'non-personally identifiable information' to third parties in order to collect statistical data for the purposes of online retargeting.

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## **HOW LONG WE KEEP YOUR DATA**

Strawberry Property will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was initially gathered, and in line with any further choices you have indicated about how we should handle your Personal Data. This includes retaining it in order to comply with legal and regulatory requirements and in case of legal claims.

The criteria we use to determine data retention periods for your Personal Data includes the following:

- retention in case of queries – for example, where you contact us to receive further information about the way we handle your data;

- retention in case of claims - for the period in which you might legally bring claims against us which can be 6 years;
- retention in accordance with legal and regulatory requirements - after your agreement with us has come to an end; and
- retention in relation to (repeat) purchase or letting cycles in the property industry; and
- to stay in touch about your property requirements on an ongoing basis, where you have selected to receive these.

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### **THIRD PARTY SITES**

Third party internet sites and social media platforms that you can link through to from our website will not be covered by our Privacy Policy and Strawberry Property accepts no responsibility or liability for any actions that these sites may perform. We advise that you should check the privacy policies of these sites and platforms where you use them.

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### **AUTOMATED DECISION MAKING AND PROFILING**

Strawberry Property does not employ the use of profiling or automated decision making.

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### **YOUR RIGHTS IN RELATION TO YOUR INFORMATION**

Your rights are as follows:

- the right to be informed about your Processing of your Personal Data;
- the right to have your Personal Data corrected if it is inaccurate and to have incomplete Personal Data completed;
- the right to object to Processing of your Personal Data;
- the right to restrict Processing of your Personal Data;
- the right to have your Personal Data erased (the “right to be forgotten”);
- the right to request access to your Personal Information and to obtain information about how we process it;
- the right to move, copy or transfer your Personal Data (“Data Portability”); and
- rights in relation to automated decision making, including profiling.

Where you have provided your consent, for example to marketing, you are free at any time to withdraw your consent where that is relied upon as the lawful reason for Processing your Personal Data. To do this you will need to contact by telephone, email, writing, or in person, Strawberry Property, to withdraw your consent or click “unsubscribe” on the direct marketing email you may have received. Please note that if you do withdraw your consent and there is no alternative lawful reason which justifies our Processing of your Personal Data for a particular purpose, it may mean that you cannot receive some marketing communications.

If you wish to change the information that we hold for you, please contact the office. If you wish to have your information removed from our database either permanently or temporarily, please advise the office with which you originally registered. Your information will be removed as soon as is practically possible.

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## **TRANSFERS OF YOUR INFORMATION OUTSIDE OF THE EEA**

If we transfer your information outside of the European Economic Area (EEA) (as it is made up from time to time) we will ensure that appropriate safeguards are in place to protect that transfer, such as contractual obligations being imposed on the recipients of your Personal Data. Those obligations require the recipient to protect your Personal Data to the standard required in the EEA. Safeguards also include requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing and where the framework is the means of protection for the personal information.

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## **SECURITY**

Strawberry Property is committed to having a high level of security in place to protect against the level of risk posed by the processing of Personal Data. When you register your details, we will take all reasonable steps to keep these details secure and free from unauthorised access by use of technology and internal systems which will be updated as new technology becomes available and is appropriate to our systems. While we take efforts to safeguard your Personal Data which are consistent with relevant Data Protection Laws, the nature of the internet is such that we cannot guarantee absolutely the security of any Personal Data you disclose online. Any Personal Data that you send via the Strawberry Property and Hanstone Website to us is sent at your own risk.

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## **CONTACT US**

If you simply have a query about any aspect of this policy or wish to have any part of it clarified, please contact our office. In the unlikely event that you have a complaint about the way in which your details are used or stored by this company, please contact [info@strawberry-property.co.uk](mailto:info@strawberry-property.co.uk) or write to:

The Directors of Strawberry Property at:

Unit 5

Stoke View Business Park

Stoke View Road

Fishponds

Bristol

BD16 3AE

You have the right to complain to the Information Commissioner's Office at any time. It has enforcement powers and can investigate compliance with data protection laws: <https://ico.org.uk/>

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## COOKIES

A cookie is an element of data that a website can send to your browser, which may then store it on your system. Cookies allow us to understand who has seen which pages on the Strawberry Property and Hanstone Websites.

The different types of cookies that exist are as follows:

- Cookies **“strictly necessary”** for functionality of the Strawberry Property and Hanstone Website platforms. These cookies are essential in order to enable users to move around the Strawberry Property and Hanstone Websites and use their features.
- **“Performance”** cookies which collect information about how users navigate the Strawberry Property and Hanstone Websites, for instance which pages users access most frequently. They identify how users interact with the Strawberry Property and Hanstone Websites, find out which pages seem to hold people up, which pages are not used often, which pages take a long time to load, what pages users tend to visit and in what order.
- **“Functionality”** cookies which allow the Strawberry Property and Hanstone Websites to remember choices made by a user based on e.g. language or region of user.
- **“Targeting or advertising”** cookies used on the Strawberry Property and Hanstone Websites to deliver adverts relevant to an identified machine or other device (not a named or otherwise identifiable person) which are tailored to interests associated with the Strawberry Property and Hanstone Websites activity tied to that machine or device. For example, if a cookie on a third party Strawberry Property and Hanstone Websites recognises that a particular product was purchased from a particular device, that cookie may “talk to” marketing cookies on this Strawberry Property or Hanstone Website to ensure advertisements about similar products are displayed when this Strawberry Property or Hanstone Website is accessed from that device. These cookies are also used to limit the number of times a user sees an advertisement as well as to help measure the effectiveness of the advertising campaign. They may also remember that this Strawberry Property or Hanstone Website has been visited from a device and share that information with marketing organisations. They may be used to monitor from which advertising source a user was first directed towards the Strawberry Property or Hanstone Website, so that the operator of the Strawberry Property or Hanstone Website knows whether it is worth investing in a particular advertising source. Usually this type of cookie will be operated by a third party.

[www.allaboutcookies.org](http://www.allaboutcookies.org) is a user-friendly site which explains the terms used.

The different types of impact that cookies can have on your privacy are as follows:

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## PRIVACY NEUTRAL COOKIES OR BASIC COOKIES OR SESSION COOKIES

Have no privacy impact: e.g. cookies which simply allow you to improve your Strawberry Property or Hanstone Website visit based on information such as which links are used or which pages are visited most frequently; cookies to maintain user preferences; cookies which keep a registered user logged into the site; cookies which remember a user's machine when he/it returns to the site. Implied consent is usually adequate for these.

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## MORE INTRUSIVE COOKIES WILL HAVE A PRIVACY IMPACT:

Such as cookies which monitor patterns of buying specific goods or interest in eg holidays or hobbies. This is how a user's habits are "recognised" by the Strawberry Property or Hanstone Website. These cookies facilitate tailored marketing (eg Mr X buys one type of music or one type of product online; advertising space on other sites will then recognise his machine when he uses it to visit them and those other sites can advertise the same type of music or products to him).

These cookies run advertisements tailored to the user based on his buying habits on the Strawberry Property or Hanstone Website. This is what happens when a user shopping on the Strawberry Property or Hanstone Website sees adverts pop up which relate to items he has just purchased on eg Amazon.

Cookies are either stored in memory (session cookies) or placed on the user's hard disk (persistent cookies). The key difference between the two is the time of expiration. Session cookies expire at the end of the session, i.e. when a user closes his browser window, the session cookie is deleted. Persistent cookies do not expire at the end of the session and remain on the hard disk. Session cookies allow users to be recognised within the Strawberry Property or Hanstone Website so any page changes or item or data selection are remembered from page to page.

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## WHAT COOKIES DO STRAWBERRY PROPERTY AND HANSTONE WEBSITES USE?

Below is a list of the cookies used by this website and provides a description of how each cookie works.

- Google Analytics (utmz, utma, utmb, utmc) This website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of our website and compile reports for us on activity of our website.
- Back to list links (jssBacktoList) Only lasts for the current browsing session Records the last property list the user viewed.

How do I restrict or delete cookies? The cookies we use are essential for parts of the website to operate, some may have already been set. You may delete and block all cookies from this website, but please be aware that restricting or

deleting cookies may impact on the functionality of the website. Your web browser may allow you to restrict or delete cookies set by this website. The Help function within your browser should tell you how. Alternatively, you can visit [www.allaboutcookies.org](http://www.allaboutcookies.org) which provides general information about cookies and how you can manage cookies on your computer.

Use of Pixels on our website: A pixel is an analytics tool that allows us to measure the effectiveness of our online advertising by understanding the actions people take on our website. At certain times, we use a pixel to assess visitor journeys, which allows us to run online advertising campaigns that retarget our site visitors, and a wider targeted audience, with relevant marketing information.

For further information, please see our Cookie Table.