



## Privacy Policy

SLM Property Services Ltd is a private limited company registered in England and Wales (with registered number 11789901) and whose registered office address is 4 Whitchurch Parade, Whitchurch Lane, Edgware, HA8 6LR

SLM Property Services Ltd is responsible for collecting and processing your personal data in relation to our activities. The purpose of this Data Protection Notice is to let you know which personal data we collect about you, the reasons why we use and share such data, how long we keep it, what your rights are and how you can exercise them.

### **1. WHICH PERSONAL DATA DO WE USE ABOUT YOU?**

We collect and use your personal data to the extent necessary in the framework of our activities and to achieve a high standard of personalised products and services.

Depending among others on the type of product or service we provide to you, we may collect various types of personal data about you, including:

- identification information (e.g. name, ID card and passport numbers, nationality, place and date of birth, gender, photograph, IP address);
- contact information (e.g. postal address and e-mail address, phone number);
- family situation (e.g. marital status, number of children);
- economic, financial and tax information (e.g. tax ID, tax status, income and other revenues, value of your assets);
- education and employment information (e.g. level of education, employment, employer's name, remuneration);
- banking, financial and transactional data (e.g. bank account details, credit card number, money transfers, assets, declared investor profile, credit history, debts and expenses);
- data relating to your habits and preferences:
- data which relate to your use of our products and services in relation with banking, financial, transactional data and any other real estate data;
- data from your interactions with us (e.g.: our internet websites, our apps, our social media pages, meeting, call, chat, email, interview, phone conversation, correspondence, requests for information or documents, method of commercialisation);
- video surveillance (including CCTV);
- geolocation data (e.g. for security reasons, or to identify the location of the nearest branch or service suppliers for you);
- connection and tracking data (e.g.: audit trail, timestamping, cookies, connection to online service)
- data necessary to fight against over indebtedness, fraud, money laundering and terrorist financing.

We may collect the following sensitive data only upon obtaining your explicit prior consent where required:

- health data : for instance for the drawing up of some insurance contracts; this data is processed on a need-to-know basis.

We never ask for personal data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sex orientation, unless it is required through a legal obligation.

The data we use about you may either be directly provided by you or be obtained from the following sources in order to verify or enrich our databases:

- publications/databases made available by official authorities (e.g. the official journal);
- our corporate clients or service providers;
- third parties such as credit reference agencies and fraud prevention agencies or data brokers in conformity with the data protection legislation;
- websites/social media pages containing information made public by you (e.g. your own website or social media); and
- databases made publicly available by third parties.

## **2. SPECIFIC CASES OF PERSONAL DATA COLLECTION, INCLUDING INDIRECT COLLECTION**

In certain circumstances, we may collect and use personal data of individuals with whom we have, could have, or used to have a direct relationship such as:

- Prospects

For some reasons, we may also collect information about you whereas you have no direct relationship with us.

This may happen for instance when your employer provides us with information about you or your contact details are provided by one of our clients if you are for example:

- Family members;
- Co-borrowers / guarantors;
- Legal representatives (power of attorney);
- Beneficiaries of payment transactions made by our clients;
- Beneficiaries of insurance policies and trusts;
- Landlords;
- Ultimate beneficial owners;
- Clients' debtors (e.g. in case of bankruptcy);
- Company shareholders;
- Representatives of a legal entity (which may be a client or a vendor);
- Staff of service provider and commercial partners.

## **3. WHY AND ON WHICH BASIS DO WE USE YOUR PERSONAL DATA?**

### **a. To comply with our legal and regulatory obligations**

We use your personal data to comply with various legal and regulatory obligations, including:

- Real estate regulations
- banking and financial regulations in compliance with which we:
- set up security measures in order to prevent abuse and fraud;
- detect transactions which deviate from the normal patterns;
- monitor and report risks that institution could incur; and
- record, when necessary, phone calls, chats, email, etc.
- reply to an official request from a duly authorised public or judicial authority;
- prevention of money-laundering and financing of terrorism;
- compliance with legislation relating to sanctions and embargoes;
- fight against tax fraud and fulfilment of tax control and notification obligations.

### **b. To perform a contract with you or to take steps at your request before entering into a contract**

We use your personal data to enter into and perform our contracts, including to:

- provide you with information regarding our products and services;
- assist you and answer your requests;
- evaluate if we can offer you a product or service and under which conditions; and
- provide products or services to our corporate clients of whom you are an employee or a client.

### **c. To fulfil our legitimate interest**

We use your personal data in order to deploy and develop our products or services, to improve our risk management and to defend our legal rights, including:

- proof of transactions;
- fraud prevention;
- IT management, including infrastructure management (e.g. : shared platforms) & business continuity and IT security;
- establishing individual statistical models, based on the analysis of transactions, for instance in order to help define your credit risk score;
- establishing aggregated statistics, tests and models, for research and development, in order to improve the risk management of our group of companies or in order to improve existing products and services or create new ones;
- training of our personnel by recording phone calls
- personalising our offering to you through:
- improving the quality of our products or services;
- advertising products or services that match with your situation and profile which we achieve.

This can be achieved by:

- segmenting our prospects and clients;
- analysing your habits and preferences in the various channels (emails or messages, visits to our website, etc.);
- matching the products or services that you already hold or use with other data we hold about you; and
- monitoring transactions to identify those which deviate from the normal routine.

Your data may be aggregated into anonymised statistics that may be offered to professional clients to assist them in developing their business. In this case your personal data will never be disclosed and those receiving these anonymised statistics will be unable to ascertain your identity.

d. To respect your choice if we requested your consent for a specific processing

In some cases, we must require your consent to process your data, for example:

- where the above purposes lead to automated decision-making, which produces legal effects or which significantly affects you. At that point, we will inform you separately about the logic involved, as well as the significance and the envisaged consequences of such processing;
- if we need to carry out further processing for purposes other than those above in section 3, we will inform you and, where necessary, obtain your consent.

#### **4. WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

In order to fulfil the aforementioned purposes, we only disclose your personal data to:

- Service providers which perform services on our behalf;
- Independent agents, intermediaries or brokers, banking and commercial partners, with which we have regular relationship;
- Financial or judicial authorities, arbitrators and mediators, state agencies or public bodies, upon request and to the extent permitted by law;
- Certain regulated professionals such as lawyers, notaries or auditors.

#### **5. TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA**

In case of international transfers originating from the European Economic Area (EEA), where the European Commission has recognised a non-EEA country as providing an adequate level of data protection, your personal data may be transferred on this basis.



For transfers to non-EEA countries whose level of protection has not been recognised by the European Commission, we will either rely on a derogation applicable to the specific situation (e.g. if the transfer is necessary to perform our contract with you such as when making an international payment) or implement one of the following safeguards to ensure the protection of your personal data:

- Standard contractual clauses approved by the European Commission;
- Binding corporate rules.

To obtain a copy of these safeguards or details on where they are available, you can send a written request as set out in Section 9.

## **6. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?**

We will retain your personal data for the longer of the period required in order to comply with applicable laws and regulations or another period with regard to our operational requirements, such as proper account maintenance, facilitating client relationship management, and responding to legal claims or regulatory requests. For instance, most of client's information is kept for the duration of the contractual relationship and 10 years after the end of the contractual relationship. For prospects, information is kept 3 years.

## **7. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?**

In accordance with applicable regulations, you have the following rights:

- To access: you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- To rectify: where you consider that your personal data are inaccurate or incomplete, you can require that such personal data be modified accordingly.
- To erase: you can require the deletion of your personal data, to the extent permitted by law.
- To restrict: you can request the restriction of the processing of your personal data.
- To object: you can object to the processing of your personal data, on grounds relating to your situation. You have the absolute right to object to the processing of your personal data for direct marketing purposes, which includes profiling related to such direct marketing.
- To withdraw your consent: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.
- To data portability: where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.

If you wish to exercise the rights listed above, please send a request to [info@slmproperty.com](mailto:info@slmproperty.com) or a letter to the following address: SLM Property Services Ltd, 4 Dukes House, 4-6 High Street, Windsor, Berkshire, SL4 1LD. Please include a scan/copy of your identity card for identification purpose.

In accordance with applicable regulation, in addition to your rights above, you are also entitled to lodge a complaint with the directors of the company.

## **8. HOW CAN YOU KEEP UP WITH CHANGES TO THIS DATA PROTECTION NOTICE?**

In a world of constant technological changes, we may need to regularly update this Data Protection Notice. We will inform you of any material changes through our website or through our other usual communication channels.



## 9. HOW TO CONTACT US?

If you have any questions relating to our use of your personal data under this Data Protection Notice, please contact us at [info@slmproperty.com](mailto:info@slmproperty.com) and we will your query.

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