PRIVACY POLICY

*“We are committed to protecting your privacy, and will ensure that any information you provide to us will be collected and used in accordance with the General Data Protection Regulation and the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003. We will not share your data with any third party except for administrative purposes relating to the services we provide and where we may be required to do so by law.”* **Unity Property Professionals Group**

**INTRODUCTION**

Welcome to Unity Property Professionals Group’s privacy notice.

Unity Property Professionals Group 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 (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

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**1.**  **IMPORTANT INFORMATION AND WHO WE ARE**

**PURPOSE OF THIS PRIVACY NOTICE**

This privacy notice aims to give you information on how Unity Property Professionals Group collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a service or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children.

It is 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 are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

**CONTROLLER**

Unity Property Professionals Group is the controller and responsible for your personal data (collectively referred to as Unity Property Professionals Group, “we”, “us” or “our” in this privacy notice).

We have a team 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 us on rupert@woodhouseinv.co.uk using the details set out below.

**CONTACT DETAILS**

Our full details are:

***Full name of legal entity:*** Unity Property Professionals Group

***Phone Number:****07798682499*

***Email address for our DPO***: rupert@woodhouseinv.co.uk

***Postal address***: Unity Property Professionals Group, 199 Park Road, Loughborough, LE12 8RL

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*](https://www.ico.org.uk/)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us on rupert@woodhouseinv.co.uk in the first instance.

**CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was created in May 2018.

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

**THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not 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 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 about you which we have grouped together follows:

* **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.
* **Treatment Data**includes information about the treatment you wish to receive from us.  This information could include 'health data' which is a special category of personal data and therefore requires us to take extra steps to ensure it is adequately protected.

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 is not 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 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.

With the exception of Treatment Data, we do not collect any other **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.

**IF YOU FAIL 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 fail to provide that data when requested, 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 or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

The Unity Property Professionals Group website logs IP addresses and browser types to provide you with the best possible user experience and allow us insight into consumer behaviour. You can browse our site without entering any personal information, and therefore remain anonymous during your visit. However, the enquiry form asks for personal information such as name, postal address, email address and telephone number to enable us to send out the requested information, and make any future visits to our site easier.

**3.  HOW IS YOUR PERSONAL DATA COLLECTED?**

 We use different methods to collect data from and about you including through:

 •         **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;
* filling out of the contact form on our website;
* email us directly for information;
* subscribe to our service or publications;
* request marketing to be sent to you;
* enter a competition, promotion or survey; or
* 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, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

•          **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

•          Technical Data from the following parties:

1. analytics providers such as Google, Wix, Facebook and Instagram based inside  OR outside the EU;
2. advertising networks such as Adroll or Affilinet based inside OR outside the EU; and
3. search information providers such as Google or Bing based inside OR outside the EU.

 •         Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as PayPal and Elavon based inside the EU.

•          Identity and Contact Data from data brokers or aggregators Experian based inside the EU.

•          Identity and Contact Data from publicly availably 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. Most commonly, we will use your personal data in the following circumstances:

* Where we need to perform the contract we are about to enter into or have entered into with you.
* 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.

Generally we do not 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 by email to info@fabclinics.com

**USING YOUR HEALTH DATA**

In light of the services which we provide to our customers, it will often be necessary for us to use information about your health. Even in the broadest sense of the word, 'health' information is a special category of personal data which requires us to have an additional lawful basis for using this information.  Where we use information about your health for the purpose of providing our services to you (or in preparation for us to provide services to you), the additional lawful basis on which we shall rely will be that such use is necessary in order for us to provide you with health care or treatment.

**PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a 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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us [*rupert@woodhouseinv.co.uk*](mailto:%20elena@fabclinics.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |  |
| --- | --- | --- |
| **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 |
| To process and deliver our services to you 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  (f) Health information | (a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)  (c) Necessary for us to provide health care or treatment |
| 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 or take a survey | (a) Identity  (b) Contact  (c) Profile  (d) Marketing and Communications  (e) Health information | (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)  (d) Necessary for us to provide health care or treatment |
| To enable you to partake in a prize draw, competition or complete a survey | (a) Identity  (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications | (a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) |
| 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 |
| 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) |

**MARKETING**

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

**PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased good or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

**THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any company outside the Unity Property Professionals Group Loughborough Ltd for marketing purposes.

**OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time following the opt-out links on any marketing message sent to you or by emailing us on [info@fabclinics.com](mailto:info@fabclinics.com) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

**COOKIES  & WEBTRACKING**

***i. WHAT ARE COOKIES?***

Our site uses cookies to keep track of progress and to provide our visitors with a tailored user experience. With the help of cookies, we can present you with customised content and adverts that will be of more interest to you. We also use cookies to remember your passwords for you so you don't have to re-enter them each time you visit the site. You have the option of setting your browser to reject cookies. However, if certain cookies that track your details are rejected then we won't be able to pre-fill any data on the site or direct you to the correct stage on your next visit.

***ii. COOKIE UPDATE***

**Unity Property Professionals Group** use necessary cookies to make the website easier for you to use and to ensure you get the best experience. If you choose to continue without changing these settings, you consent to this, but should you want to, you can change your settings at any time.

We will only read or write cookies for the preference level set, cookies set prior to you changing your settings will still be on your computer and you can remove them using your browser settings.

We use a cookie to remember your cookie preferences this has a couple of consequences

* If you delete all your cookies you will have to update your preferences with us again.
* If you use a different device, computer profile or browser you will have to tell us your preferences again.

***iii. ADVERTISER COOKIES***

You may be served cookies from our advertisers while visiting our site. We do not control, nor do we have access to, any of the information they may collect.

***iv. HOW WE USE COOKIES AT unitypropertyprofessionals.com***

**Affilinet** – cookies used by the Affilinet advertising service. Full details can be found [here](https://www.affili.net/uk/about-cookies).

* **ASP.NET\_SessionId** - Stores the unique session ID provided to the user by the website.
* **.ASPXFORMSAUTH** - Stores the user's encrypted authentication ticket when using forms authentication.
* **Campaign**- Stores the web analytics Campaign assigned to the visitor.
* **CMSAB<ABtestname>** - Used to track conversions for the test and maintain consistent page content for the visitor. Stores the name of the page variant assigned to the visitor, the list of performed conversions and information whether visitor is included in A/B testing specified by an A/B test.
* **CMSCookieLevel** - Specifies which cookies are allowed by the visitor.
* **CMSCsrfCookie** - Store's a security token that the system uses to validate all form data submitted via POST requests. Helps protect against Cross site request forgery.
* **CMSMVT<mvtestname>** - Stores the combination of variants assigned to the visitor by an MVT test. Used to track conversions for the test and maintain consistent page content for the visitor.
* **CMSPreferredCulture** - Stores the visitor's preferred content culture.
* **CMSShoppingCart** - Stores a reference to the user's active shopping cart.
* **CookieBar**- Stores whether or not the visitor has accepted the cookie policy.
* **CPCKeyword** - Stores the keyword that directed the visitor to the site if it was via a PPC campaign.
* **CurrentContact** - Stores the GUID of the contact related to the current site visitor. Used to track activities on the website.
* **DoubleClick** - Cookies used by the Google DoubleClick advertising service. Full details on DoubleClick cookies can be found [here.](https://support.google.com/dfp_premium/answer/2839090?hl=en)
* **Google Analytics** - Cookies used by Google Analytics to track the visitor’s data on the website. Full details on Google Analytics cookies can be found [here](https://code.google.com/apis/analytics/docs/concepts/gaConceptsCookies.html).
* **Hotjar** – Cookies used by the Hotjar user experience tool. Full details on Hotjar cookies can be found [here](https://help.hotjar.com/hc/en-us/articles/115011789248-Hotjar-Cookies).
* **Infinity** – Cookies used by the Infinity call tracking service. Full details in Infinity cookies can be found [here](https://www.infinity.co/knowledge-base/article/cookies).
* **Optimizely**- Cookies used by the Optimizely testing and personalisation service. Full details of how Optimizely use your details can be found [here](https://www.optimizely.com/privacy/)
* **Pingdom**- Cookies used by the Pingdom website monitoring tool. Full details on how Pingdom use your information can be found [here](https://www.pingdom.com/legal/privacy-policy).
* **ProductsVsShop** - Stores which variant of the navigation the visitor has been served in an MVT.
* **SorryYourLeavingPopupShown** - Stores whether or not the visitor has been show the sorry you’re leaving popup.
* **Source**- Stores the channel which the user came from (e.g., email, Facebook, Twitter, etc.).
* **StickyFooter-<ActionName>** - Stores whether or not the visitor has performed an action in the mobile sticky footer.
* **StickyHeaderViewed** - Stores whether or not the visitor has been show the sticky header on the desktop version of the website.
* **TimeOnSite** - Stores the total time in seconds the visitor has been on the website this session.
* **UrlReferrer, ReferrerURL** - Stores the URL referrer from which the user arrives on the website.
* **VisitorStatus** - Indicates if the visitor is new or returning. Used for tracking the visitors statistic in Web analytics.
* **Wix** - There are two types of cookies (both used on Wix sites):
  + Session (Transient) cookies: these cookies are erased when you close your browser, and do not collect information from your computer. They typically store information in the form of a session identification that does not personally identify the user.
  + Persistent (Permanent/Stored) cookies: these cookies are stored on your hard drive until they expire (i.e based on a set expiration date) or until you delete them. These cookies are used to collect identifying information about the user, such as Web surfing behavior or user preferences for a specific site.

***v. INFORMATION THIS WEBSITE GATHERS/TRACKS***

As web tracking offers more chances to market to website visitors across the Internet, you as a visitor to the Unity Property Professionals Group website may be targeted with adverts on other websites. Google and third party vendors might show targeted adverts with the ability to opt out. First and third party cookies are used to provide information and offer improvements to optimise quality of adverts served. You can change the cookie management settings in your web browser to stop these adverts. If you are a registered Facebook user, you may also receive targeted adverts from Unity Property Professionals Group. You can read about how Facebook works by following  this link <https://en-gb.facebook.com/policies/cookies/>

**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 on rupert@woodhouseinv.co.uk

If we need to use your personal data for an unrelated purpose, we will notify you and we will 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, 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. Such third parties consist of:

* **IT:**Service providers acting as processors who provide IT and system administration services.
* **Advisors:** Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
* **Authorities:**HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

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.

**6.**  **INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (**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 are legally required to do so.

**8.**  **DATA RETENTION**

**HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

**Unity Property Professionals Group** 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us on rupert@woodhouseinv.co.uk

**9.**  **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

* *Request access to your personal data*.
* *Request correction of your personal data*.
* *Request erasure of your personal data*.
* *Object to processing of your personal data*.
* *Request restriction of processing your personal data*.
* *Request transfer of your personal data*.
* *Right to withdraw consent*.

If you wish to exercise any of the rights set out above, pleasecontact us on rupert@woodhouseinv.co.uk**.**

**NO FEE USUALLY REQUIRED**

You will not 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.

**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 is not 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.

**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**

**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 do not 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 on rupert@woodhouseinv.co.uk

**Performance of Contract** means processing your data where it is 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.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Necessary for us to provide health care or treatment**means processing your special categories of personal data (i.e. health data) where it is necessary for the purposes of preventive or occupational medicine, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of EU or UK law or pursuant to contract with a health professional (subject to required conditions and safeguards).

**YOUR LEGAL RIGHTS**

You have the right to:

**Request access**to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction**of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure**of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing**of your personal data where we are 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 are 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.

**Request restriction of processing**of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer**of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time**where we are relying on consent to process your personal data. However, this will not 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