Privacy Notice

1. Scope

Housecure Limited ('Housecure', 'we', 'us') takes the protection of privacy very seriously. This notice describes how we collect, use, and handle your personal data. It also describes your data protection rights, including a right to object to some of the processing which Housecure carries out. More information about your rights, and how to exercise them, is set out in the 'Your rights?' section below.

This notice applies to the information Housecure collect from customers, prospects, and business contacts when they use the Housecure platform. It also covers personal information collected on www.housecure.co.uk.

We are the controller for the personal data which is hosted on the Housecure platform or with our Processors.

2. Who we are

We are Housecure with a vision to transform property transactions and home ownership.

The website www.housecure.co.uk and apps in the UK are run by Housecure.

3. What information do we collect?

We collect and process the following information:

- your first name
- your last name
- your email address
- your mobile number (which is optional)
- your marketing preferences, including any consents you have given us;
- Information you provide in enquiry forms; and
- information related to the browser or device you use to access our website.

Sometimes, we receive information about you from third parties.

4. How do we use this information?

We process this data for the following lawful purposes:

To fulfil a contract, or take steps linked to a contract with you including:

- To provide the Housecure platform and our website, and ancillary services such as customer support.
- To authenticate users of the Housecure platform.
- To send you service, technical and other administrative emails relating to the Housecure platform and our
 website, messages, and other types of communications, like two factor authentication and resetting your
 password.
- To create your user profile

As required by Housecure to conduct our business and pursue our legitimate interests, in particular:

• To ensure the Housecure platform and our website is working as intended, such as tracking outages or troubleshooting issues that you report to us.

- To make improvements to the Housecure platform and our website and to help us develop new products and services.
- To respond to enquiry forms that you complete on our website.
- We use data for analytics and measurement to understand how the Housecure platform and our website is used. For example, we analyse data about your use of the Housecure platform to do things like optimise product design. This information can consist of information such as geographical location, browser type, referral source, length of visit, pages viewed and phone make and model.
- We use information you provide to investigate any complaints received from you or from others, about the Housecure platform, our website or other services.
- For direct marketing purposes including creating a profile about you to better understand you and tailor the marketing we serve you (including on social media). This may include information about the Housecure platform or information about our other products and services.
- We will use information in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).
- To conduct surveys and other market research to ensure our services are relevant to your needs.

Where you give us consent:

- where required by law to send you direct marketing in relation to our services;
- we place cookies and use similar technologies. See our Cookie Policy; and
- on other occasions where we ask you for consent, we will use the information for the purpose which we explain at that time.

For purposes which are required by law:

• In response to requests by government or law enforcement authorities conducting an investigation.

5. Disclosure

• **Processors & International Transfers**: Like many companies, we use suppliers to support of data processing. Some of our key service providers are listed below. We have Data Processing Agreements in place with these providers. Where data is transferred outside of the UK, we ensure that appropriate protection and mechanisms are in place, for example Standard Contractual Clauses (SCC). For transfers to the EU, we rely on the adequacy agreement that is in place.

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Vendor	Purpose	International Transfer Safeguard
Hubspot / based in the United States	Marketing automation / company updates / product information	Standard Contractual Clauses including UK Addendum
Send In Blue / based in France	Marketing automation / company updates / product information	EU-UK Adequacy Decision

Vendor	Purpose	International Transfer Safeguard
Amazon Web Services (AWS) / based in Ireland	Product Database	EU-UK Adequacy Decision
Salesforce / based in Ireland	Key contact database / support ticketing system (including user contact information) / product information / marketing database	EU-UK Adequacy Decision
CloudCall / England	Call recording software for training and quality purposes	No Applicable
Stripe / Ireland	Online payment provider	EU-UK Adequacy Decision
Zapier / United States	Marketing automation	Standard Contractual Clauses including UK Addendum

- Legal reasons. We will share personal information outside of Housecure if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to (i) enforce applicable terms of service or other agreements, including investigation of potential violations and audits, (ii) detect, prevent, or otherwise address fraud, abuse, security risks, or technical issues, and (iii) protect against harm to the rights, property or safety of Housecure, our users, or the public as required or permitted by law.
- **Group companies.** We may share your information with our group of companies for the purposes of business administration, maintaining security and regulatory compliance, providing support services to end users (including IT support, where relevant), marketing and analytics.
- **Business transfers**. In the event that Housecure undergoes any reorganisation, restructuring, merger, sale, or other transfer of assets your information will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to any new owners of the business.

6. Retention

For data which is hosted in the Housecure platform: Housecure is a Controller for personal data hosted in the Housecure platform or held by Processors at our instruction. For Housecure users (such as customers, prospects, and business contacts) we will continue to process your personal data whilst we have a legitimate business need.

If you have exercised your data protection rights in relation to the right to be forgotten or to restrict processing, we will fulfil valid requests as soon as practicable and usually within 28 days of your request being received. Sometimes business and legal requirements oblige us to retain certain information, for specific purposes, for an extended period of time. Reasons we might retain some information for longer periods of time include security, fraud prevention, financial record-keeping, complying with legal or regulatory requirements. A retention schedule is maintained and can be made available on request. The longest period we are likely to keep your personal data is approximately 15 years as this typically aligns to the average period between house purchases.

7. Your rights

Where required by applicable law or regulation, you have the right to **ask us for a copy** of your personal information; to **correct**, **delete** or **restrict** (stop any active) processing of your personal information; and to

obtain the personal information you provide to us for a contract or with your consent in a structured, machine readable format, and to ask us to share (port) this information to another controller.

In addition, you can **object to the processing** of your personal information in some circumstances (in particular, where we don't have to process the information to meet a contractual or other legal requirement, or where we are using the information for direct marketing). These **rights may be limited**, for example if fulfilling your request would reveal personal information about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights - or get a copy of our legitimate interest balancing tests - you can get in touch with us using the details set out below. If you have unresolved concerns, you have the **right to complain** to an information protection authority where you live, work or where you believe a breach may have occurred.

For the provision of information marked as mandatory when you register to use the Housecure platform, if such information is not provided, then you will not be able to use the service. All other provision of your information is optional. If you do not provide such information, our provision of certain services to you may be detracted from.

8. Contact Details

Our Data Protection Officer and data protection representatives can be contacted directly here:

By email: dpo@housecure.co.uk