



ASPIREPROPERTYGROUP

PRIVACY NOTICE

We are committed to protecting and respecting your privacy. This notice sets out how and why we process your personal information.

Please read this Privacy Notice carefully to understand our practices and your data protection rights. By visiting any of our websites (**our sites**) you are accepting and agreeing to the practices described in this notice.

For the purpose of data protection legislation, the data controller is Aspire Trading House Limited

What information do we collect from you?

We will collect and process the following personal information about you:

- **Information you give us.** This is information about you that you give us by filling in forms on our site or by corresponding with us by phone, email or otherwise. The information you give us may include your name, address, email address and phone number and financial information. Please let us know if any of this information changes so we can keep our records up to date.
- **Information we collect from your use of our site.** When you visit our site we may automatically collect the following information:
 - o technical information, such as the Internet protocol (IP) address used to connect your device to the Internet,
 - o whereabouts you connected to our service,
 - o your internet service provider (ISP), and
 - o what type of device you are using to access our service
- **Information we collect throughout our relationship.** This is information relating to products that you download, sessions and courses you attend, and services you use and contact us about
- **Information we collect when you call us.** If you call us we may automatically collect the phone number used to call us
- **Information we receive from other sources.** We are working closely with other organisations, including:

Linkedin, Facebook, Twitter, Instagram. When you click on an advert about us or download from a social media site we may receive information about your profile and your expression of interest from those sources.

Why do we collect this information?

We use this information in the following ways:

- **Information you give to us or which we receive from other sources.** We use this information:
 - o in order to take steps necessary to assess whether we can enter into a contract with you and in order to perform our contract with you. This includes carrying out our obligations to you and providing you with our, or a third party's products and services;
 - o for the purpose of improving our service to you, to ensure that content from our site is presented in the most effective manner for you and for your device;
 - o to deal with any legal queries relating to your use of our service;
 - o to provide you with service communications so that we can perform our obligations to you. These may be sent by email. These will include notifications about changes to our service, event details and information about products that you have signed up to;
 - o to provide you with marketing communications including, with your permission, information about other goods and services we offer that are similar to those that you have already purchased or enquired about; or
 - o in our or a third party's legitimate interests of keeping customers up to date with goods and services, increase awareness of us and third parties within the market, making promotional offers and generating new business, building and maintaining loyalty or market share.
- **Information we collect from your use of the site.** We will use this information for the following purposes:
 - o to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - o to improve our site to ensure that content is presented in the most effective manner for you and for your device;
 - o as part of our efforts to keep our site safe and secure;
 - o to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

- **Information we collect throughout our relationship.** We will use this information to improve our offering and help us provide you with our good and services.

How long do we keep hold of your information?

We will keep information about you for a maximum of 6 years after the end of our relationship with you unless obligations to our regulators require otherwise or we are required to remove such data from our records.

Who might we share your information with?

For the purposes set out in the 'Why do we collect this information?' section above, we share your personal information with:

- Selected associated third parties, some of whom we appoint to provide services, including:
 - business partners, subsidiaries, affiliates, suppliers and sub-contractors for the performance of any contract we enter into with you or for marketing purposes (save where you have opted out of marketing);
 - analytics and search engine providers that assist us in the improvement and optimisation of our site;
 - Customer survey providers in order to receive feedback and improve our services.
- Any member of our group of companies, which means our subsidiaries.

Additionally, we will disclose your personal information to the relevant third party:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, our regulator, or others.

How is your data stored and kept secure?

All information kept by us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We may hold and transfer personal data outside the EEA, but only where those organisations have signed up to Privacy Shield or have other adequate safeguards in place such as an adequacy decision by the European Commission, standard data protection clauses or binding corporate rules.

Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

What are your rights?

Where processing of your personal data is based on consent, you can withdraw that consent at any time.

You have the following rights. You can exercise these rights at any time by contacting us at the address in this notice or through the "Contact" section of our Sites. You have the right:

- to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes;
- to ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;
- to ask us not to process your personal data for scientific or historical research purposes, where relevant, unless the processing is necessary in the public interest.
- to request from us access to personal information held about you;
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask for data to be erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate ground for processing, the data is unlawfully processed, the data needs to be erased to comply with a legal obligation or the data is children's data and was collected in relation to an offer of information society services;
- to ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the

personal data is no longer necessary for the purposes for which it was collected or you exercise your right to object (pending verification of whether there are legitimate grounds for processing);

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us using the contact details in this notice. In the event that you have a complaint about our processing of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) in the UK, at any time on www.ico.org.uk.

Changes to our Privacy Notice

This Notice may be updated from time to time. Please check back frequently to see any updates or changes to our privacy notice.

Contact Details

Please contact us at any time with any questions via our website at www.aspireproperties.co.uk