

Background- at Ornella's Estates, we're committed to respecting and protecting your privacy.

This privacy notice advises what happens to any personal data that you give to us, or any that we may collect from or about you. It applies to all products and services, and instances where we collect your personal data. This privacy notice applies to all personal information processed by or on behalf of Ornella's Estates.

Changes to our privacy notice- we may change our privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website- <https://www.ornellasesates.com>

About Ornella's Estates and our Data Protection Officer- Ornella's Estates Ltd registered office is: Unit A Suites 2&3, Briar Rhydding, Baildon, West Yorkshire BD17 7JW. Company Number: 14121693. We are a data controller of your personal data and are registered with the Information Commissioner's Office: C1132691. Our Data Protection Officer can be contacted at: simon@coxandflight.com

How do we collect personal information about you? We'll collect personal information from the following general sources:

- * from you directly, and any information from family members, associates or beneficiaries of products and services.
- * Information generated about you when you use our products and services.
- * From a broker or other intermediary who we work with to provide products or services or quote to you.
- * If you already have a product with us, have applied for one or have held one previously.
- * Business partners (for example, financial services institutions, insurers), account beneficiaries, or others who are a part of providing your products and services or operating our business.
- * From other sources such as Fraud Prevention Agencies, Credit Reference Agencies, Lenders, HMRC, DWP, publicly available directories and information (for example, telephone directory, social media, internet, news articles), debt recovery and/or tracing agents, other organisations to assist in prevention and detection of crime, police and law enforcement agencies.
- * On occasion we buy or rent information about you or customers generally from third parties including demographic information, claims history, fraud information, marketing lists, publicly available information and other information to help improve our products and services or our business.

What kinds of personal information about you do we collect and process? The personal information we collect from you and that we'll process in connection with all of our products and services might include (but is not limited to), includes:

- * Personal and contact details, such as title, full name, contact details and contact details history.
- * Your date of birth, gender and/or age.
- * Family members (if relevant to the product or service).
- * Records of your contact with us such as via phone, e-mail, personal visit and, if you get in touch with us online using our online services.
- * Products and services you hold with us, as well as have been interested in and have held, the associated payment methods used and usage of our products and services.
- * Marketing to you and analysing data, including history of those communications, whether you open them or click on links, and information about products or services we think you may be

interested in, and analysing data to help target offers to you that we think are of interest or relevance to you. Offers may include our mortgage and protection services, solicitor services, market updates, new homes properties along with any of our other products and services.

- * Information about your use of products or services held with our business partners, such as insurance policies, mortgage and protection products.
- * Information we obtained from third parties, including information such as landlord references, Title checks (property ownership), ID checks (Anti Money Laundering requirements).
- * Personal information which we obtain from Credit Reference Agencies and Fraud Prevention Agencies (see the section on 'Fraud Prevention Agencies' below), including public (for example, defaults, CCJs) and shared credit history, financial situation and financial history.
- * Fraud, debt and theft information, including details of money you owe, suspected instances of fraud or theft, and details of any devices used for fraud.
- * Information about your health or if you are a vulnerable customer.
- * Information about your property, such as tenure, location, value, number of rooms, property type and building work you've had done.
- * Financial details about you, such as your salary and details of other income, details of your savings, details of your expenditure, and payment method(s).
- * Details about all of your existing borrowings and loans, if relevant.
- * Information about your employment status, if relevant.
- * Information about your property occupier status, such as whether you are a tenant, live with parents or are an owner occupier of the property where you live at the time of your application.
- * Your residency and/or citizenship status, if relevant, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK.
- * Your marital status, family, lifestyle or social circumstances, if relevant to the product or service (for example, the number of dependents you have).
- * Insights about you and our customers gained from analysis or profiling of customers.
- * Where relevant, information about any guarantor which you provide in any application.
- * Tax information, if relevant (for example, Mortgage application, Landlord Inland revenue status)

How long do we retain your personal information? Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- * For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations (generally up to 7 years from the end of the transaction).
- * For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or
- * retention periods in line with legal and regulatory requirements or guidance.

How do we use your personal information? We may use the information that you directly provide to us in the following ways:

- * We may use your name, address and contact details for the purpose of carrying out our obligations arising from any contracts entered into by you and Ornella's Estates, such as providing you with products and services you have requested, visiting and arranging viewings of your property. Our legal basis for this use is that it is necessary for the performance of a contract to which you are party.
- * We may use your name, email address and postal address to provide you with information, you have requested from us, respond to enquiries or requests from you, communicate with you in relation to those enquiries or requests and arranging visits to your property by our staff. Our legal basis for this use is our legitimate interests, namely carrying out activities in the course of Ornella's

Estates business in response to customer enquiries or requests.

* We may use your name, email address and postal address to provide you with information regarding similar goods and services to those you have already enquired about or purchased. Our legal basis for this use is our legitimate interests, namely the ongoing marketing of our goods and services to individuals with whom we have an existing relationship in connection with our goods and services and/or who have expressed an interest in those goods and services;

* where you have entered into a contract with us or we have provided you with services, we may use your name, email address, postal address or phone number to ask for your feedback about the services we have provided to you. Our legal basis for this use is our legitimate interests, namely evaluating and where necessary improving the quality of our service provision with a view to promoting the success of our business and positive customer relationships.

* Where you are a party to an existing contract with us or regularly enter into contracts with us for our goods and services, we may use your name, email address, postal address or phone number to notify you of changes to the terms and conditions of our services. Our legal basis for this use is our legitimate interests, namely the administration and management of our business contracts and relationships.

* We may use your name, email address and postal address to send you marketing communications, if you have chosen to receive these. These may include information about properties for sale or to rent, the current property market, promotions or offers. Our legal basis for this use is legitimate interest.

* We may use your name, date of birth, postal address, residency status, photographic identity reference number from a Passport/Driving licence & utility bill to verify your identity when you enter into a contract to market your property, agree to purchase or rent a property. Our legal basis for this use is compliance with legal obligations to which we are subject.

We may analyse the personal information we collect directly from you and obtain using automated technical means to: create a profile of your interests and preferences so that we can contact you with information relevant to you (if you have chosen to receive marketing communications from us).

If relevant to the transaction and in order to fulfil yours or our contractual or legal obligations, we may also use any of your personal information that we collect from you directly and/or additional information about you from external sources where necessary to detect and reduce fraud and credit risk. Our legal basis for this use of your personal information is our legitimate interests in preventing our business being subject to fraud or credit risk.

What are the other legal grounds for our processing of your personal information (including when we share it with others)? We rely on the following legal bases to use your personal data:

1. Where it is needed to provide you with our products or services, such as:

a) assessing an application for a product or service you hold with us, including considering whether or not to offer you the product, the price, the payment methods available and the conditions to attach.

b) Managing products and services you hold with us, or an application for one.

c) Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate).

d) Sharing your personal information with business partners and services providers when you apply for a product to help manage your product.

e) All stages and activities relevant to managing the product or service including enquiry, application, administration and management of accounts, rental management companies, illustrations, requests

for transfers of equity, setting up/changing/removing guarantors.

f) For some of our profiling and other automated decision making to decide whether to offer you a product and/or service, particular payment method and the price or terms of this.

2. Where it is in our legitimate interests to do so, such as:

a) managing your products and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate).

b) To perform and/or test the performance of, our products, services and internal processes.

c) To follow guidance and recommended best practice of government and regulatory bodies.

d) For management and audit of our business operations including accounting.

e) To carry out searches at Credit Reference Agencies pre-application, at the application stage, and periodically after that. Where you have been introduced to us by a broker or other intermediary they may do these searches on our behalf.

f) To carry out monitoring and to keep records of our communications with you and our staff (see below).

g) To administer our good governance requirements such as internal reporting and compliance obligations or administration processes.

h) For market research and analysis and developing statistics.

i) For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and service.

We may send marketing to you by SMS, email, phone, post and social media and digital channels (for example, using Facebook and Google). If legitimate interest do not apply to an individual then consent will be sought in order for us to communicate with you in this way.

j) Subject to the appropriate controls, to provide insight and analysis of our customers either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses.

k) Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations.

3. To comply with our legal obligations

4. With your consent or explicit consent:

a) For some direct marketing communications.

b) For some of our profiling and other automated decision making.

c) For some of our processing of special categories of personal data such as about your health, if you are a vulnerable customer or some criminal records information

Who has access to information? We will not sell or rent your information to third parties. We may share your information to third party service providers for the purposes listed above, including but not limited to:

Ornella's Estates and service providers

* Business partners (for example, financial services institutions, insurers, solicitors, account beneficiaries) or others who are a part of providing you products and services or operating our business.

* Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Ombudsman, the Information Commissioner's Office and the Financial Services Compensation Scheme.

* Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions.

Credit Reference and Fraud Prevention Agencies (see below)

Market research organisations that help us to develop and improve our products and services.

When we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and otherwise use your information in accordance with applicable data protection law.

We may disclose your personal information to our insurers and /or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets, or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

In addition to the specific disclosures set out in this section, we may disclose your personal information where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person, or for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative out-of-court procedure.

Your rights: In this section we have summarised the rights that you have under data protection law.

Some of the rights are complex, applying only in certain circumstances and subject to certain exceptions, and in the interests of keeping this policy concise, not all of the details have been included in summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

You have the right: to object to us processing your personal information for marketing purposes. If you object, we will stop processing your personal information for this purpose. When we collect your data, you can choose whether you wish to receive marketing communications from us. If you wish to stop receiving marketing communications, you can opt out at any time by e-mailing us requesting to 'unsubscribe'.

* To access the information we hold about you and certain information about our processing of it and your rights in relation to it.

* In certain circumstances, to obtain erasure of the personal information we hold about you, subject to certain exceptions.

* To rectification of the information we hold about you.

* In certain circumstances, to restrict our processing of your personal information or object to us processing it. If you object, we will stop processing your personal information unless certain exceptions apply.

* Where our legal basis for processing your personal information is your consent or the performance of a contract and we process it by automated means, to be provided with the personal information we hold about you in structured, commonly used and machine-readable format and to transmit the information to another controller.

- * To not be subject to a decision based solely on automated processing, including profiling, that produces legal effects concerning you or similarly affecting you, subject to certain exceptions.
- * Where our processing of your personal information is based on your consent, to withdraw that consent at any time. If you withdraw your consent, we will stop the relevant processing, but it will not affect the lawfulness of our processing before the withdrawal.

To exercise any of these rights, email us at info@ornellasestaes.com or write to us at Ornella's Estates, Unit A Suites 2&3, Briar Rhydding, Baildon, West Yorkshire, BD17 7JW. In addition, you can exercise your right to object to direct marketing at any time by e-mailing us requesting to 'unsubscribe'.

If you consider that our processing of your personal information infringes data protection laws, you have the right to lodge a complaint to a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. More information about lodging a complaint with the Information Commissioner's Office (the relevant UK supervisory authority) can be found at <https://ico.org.uk/concerns/>.

Security precautions in place to protect your information- we take appropriate technical and organisational precautions to secure your personal information and prevent its loss, misuse or alteration.

Links to other websites- our website may contain links to other websites run by other organisations. We are not responsible for the privacy practices of those organisations or the content of their websites. You should read the privacy policies of these organisations before providing them with any personal information.

Transferring your information outside of European Economic Area ("EEA")- we're based in the UK but sometimes your name and email may be transferred outside the European Economic Area to one of our third party software providers which aids our electronic communications with you. If we do so we'll make sure that suitable safeguards are in place, for example by using approved contractual agreements.

How do we share your information with credit reference agencies? To process your application, we'll perform credit and identity checks on you with one or more credit reference agencies (CRAs). Where you take insurance or financial services from us we may also make periodic searches at CRAs to manage your account with us. To do this we'll supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We'll use this information to:

- * Assess your creditworthiness and whether you can afford to take the product.
- * Verify the accuracy of the data you have provided to us.
- * Prevent criminal activity, fraud and money laundering.
- * Manage your account(s).
- * Assess payment methods available to you.

- * Trace and recover debts.
- * Make sure any offers provided to you are appropriate to your circumstances.

We'll continue to exchange information about you with CRAs while you have a relationship with us. We'll also notify the CRAs about your settled accounts. If you borrow and don't repay in full and on time, CRAs will record the outstanding debt. This information may be given to other organisations by CRAs. The identities of the CRAs, their role as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail on our website.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you're making a joint application, or tell us that you have a spouse or financial associate, we'll link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

What should you do if your personal information changes? You should tell us so that we can update our records- you may call us or e-mail info@ornellasestates.com we will then update your records if we can.

Do you have to provide your personal information to us? We will be unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

Do we do any monitoring involving processing of your personal information? In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

What are your marketing preferences and what do they mean? We may use your home address, phone numbers, email address and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us using the details below or by following the instructions in the communication

Review of this Policy: we keep this Policy under regular review. This Policy was produced in 2022. If we change our Privacy Policy we will post the changes on this page and may place notices on other sections of the website.

Further information: you can obtain further information about data protection laws by visiting the Information Commissioner's Office website at www.ico.org.uk.