



## PRIVACY NOTICE

### About Us

This is the privacy policy for Keylux Property Agency Ltd (“we”, “us”, and “our”), a provider of real estate services. Our company’s registered address is Pharmacy Chambers, High Street, Wadhurst, East Sussex, TN5 6AP. For the purposes of the General Data Protection Regulation (GDPR), we are the data controller of the personal data you submit via telephone enquiries, email or otherwise.

Our ICO registration number is ZB609669.

We are committed to protecting your privacy and the security of the personal data we hold and process on your behalf. This Privacy Policy explains how we collect information, what we use the information for, our legal basis for doing so, and what controls you have.

We reserve the right to change this privacy policy from time to time by changing it on [oculusproperty.co.uk](http://oculusproperty.co.uk). This privacy policy was last updated on 20<sup>th</sup> October 2023.

### What information do we collect from you?

#### Information you give to us

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

- **General personal details**, which may include:
  - o Your name
  - o Your residential address
  - o Your contact details (email address and/or your telephone number)
  - o Your date of birth
- **Communications you send to us** (by telephone, email or otherwise), for example, to report a problem or to submit queries, concerns or comments regarding the Website, our service, or general comments.

### What we do with your data?

We use your personal data for the following purposes:

#### Providing our services to you

We need to process certain personal information to provide our services to you, which includes registering you as a contact or client and complying with Money Laundering Regulations 2017 (MLR) to enable us to act on your behalf to sell or search for a property for you.

#### Contacting you about our services

If you have given us your contact information, we may use these details to get in touch with you about the services we offer, such as by following up on an incomplete registration process or by emailing you newsletters you may be interested in.

You may opt out of this at any time by telling us, or if we have contacted you via email, you will be given an option to opt-out by replying to the relevant email.

### Customer Support and account administration



We may use your personal data to provide you with customer support or to investigate complaints or concerns about your account.

#### Related products and services

We may use your personal data to provide you with information on services that you may be interested in. This information will be provided electronically via email.

We will not transfer any of your personal data to third parties for this purpose unless you give us your explicit consent.

#### Providing information to third parties for marketing purposes and for related products and services

In certain circumstances, we may ask for your consent to share your personal data with explicitly identified third parties so that they can contact you for marketing purposes or provide you with their own products or services. We will only do so if you have given us your explicit consent to share your personal information in this way. **You can withdraw your consent at any time by writing to us at: Keylux Property Agency Ltd, 167-169 Great Portland Street, 5<sup>th</sup> Floor, London, W1W 5PF or by emailing [enquiries@keyluxpropertyagency.com](mailto:enquiries@keyluxpropertyagency.com)**

#### Our lawful basis for processing your personal data

Under Article 6 of the EU General Data Protection Regulation (GDPR) we are required to tell you about the legal basis under which we collect and process your data.

We will only collect and process your personal data in accordance with one of the below lawful bases:

- **Performance of a contract:** This is where the processing is necessary for a contract we have with you, or you have asked us to take specific steps before entering into a contract, such as providing you with a quote. This lawful basis covers the following purposes:
  - o Providing our services to you
- **Our legitimate interests:** This is where we collect and process data in accordance with our "legitimate interests". Our legitimate interests include:
  - o Improving our service
  - o Providing you with marketing information about our services
  - o Providing you with customer support
  - o Providing you with information about services offered by the Oculus Property
- **Consent:** You may be given the option to explicitly consent to share your data with selected third parties for marketing purposes or to sign up for related products and services. This will be via a separate notice via email. **We will never assume that we have your consent unless you have explicitly opted in, and you can withdraw your consent at any time by contacting us.**
- **Compliance with our legal obligations:** We may be required to process or share your personal data in compliance with a legal obligation, such as in response to a request by law enforcement or when investigating a civil claim.

#### Data storage and international transfers

We take the security of your data very seriously, and all of your personal data will be kept according to strict safeguards and in compliance with the GDPR. Your data will be stored on cloud servers within the EEA and we will only store your data outside the EEA in the event that the jurisdiction in question has been assessed as compliant with the GDPR.



## **Your rights**

You have the right to be informed about what personal data we hold and how we are using it. This information is contained within this privacy notice.

If you have consented to particular uses of your personal data, you have the right to withdraw this consent at any time.

You have the right to “portability” of your personal data that we have collected with your consent or in the performance of a contract. This means that you can request copies of all the personal data we hold for this purpose in a structured, commonly used, and machine-readable form, and we will supply this to you free of charge on request. We will respond to these requests within one month, unless the request is particularly complex, in which case we will inform you of how long it will take as soon as possible.

Where we are using your personal data in accordance with our legitimate interests, you can object to further use of your data. This objection should be based on grounds relating to your particular situation. If you object, we will stop using your personal data in this way immediately, unless there are compelling legitimate grounds for processing your personal data which override your interests, rights and freedoms (such as requests by law enforcement) or we need to process your data for the establishment, exercise or defence of legal claims. You may always object to further use of your data for direct marketing purposes by clicking the “unsubscribe” button within marketing emails.

You can exercise any of your rights by contacting us via the details at the bottom of this page.

## **How long we will keep your data for**

We will only keep your personal data for as long as is necessary. This means that we will retain your personal data for as long as we have an active contract or business relationship with you, and after this, we will only keep your data for as long as is necessary for the purposes which it is stored.

## **What happens if you don't provide us with the information we need**

As outlined above, some of the personal data you provide to us will be used in order to enter into a contract with you and to comply with our legal obligations.

Should you not provide us with the data we require to offer our service or request that we erase the personal data we hold, it is likely that we will not be able to deliver our services to you.

## **Complaints**

If you feel that we have not been complying with our obligations on data protection law or you wish to assert one of your rights, please contact us without delay using the contact details provided above.

Should you be dissatisfied with our response or wish to complain to the relevant supervisory authority, you can do so by contacting the Information Commissioner's Office (ICO).