

PRIVACY STATEMENT

1. Introduction

We respect your privacy and are 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.

2. Important information and who we are

a. This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide if you choose to contact us through the website. This website is intended for adults and we do not knowingly collect data relating to children through this website. 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.

b. We are the controller and responsible for your personal data. We have appointed a Data Protection Officer who is 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 the Data Protection Officer using the details set out below.

c. Contact details

Our full details are:

Adenrele Bankole
Data Protection Officer
help@1accordliving.com

71-75 Shelton Street, London, Greater London, United Kingdom, WC2H 9JQ

d. Changes to the privacy notice and your duty to inform us of changes

We may change this notice from time to time by updating this page.

You should check this page from time to time to ensure that you are happy with any changes.

This notice is effective from 1st March 2021. 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.

e. 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 notices. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites. We encourage you to exercise

caution and read the privacy notice of every website you visit.

3. The data we collect about you

a. Types of information

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 as follows:

- Identity and contact details include your name, postcode, email address, telephone and mobile numbers.
- Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other information about the technology on the devices you use to access this website.
- Profile Data includes your job title, interests, preferences, message, enquiry and feedback.
- Usage Data includes information about how you use our website and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

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.

We do not knowingly collect any Special Categories of Personal Data about you (such as details about your race or ethnicity, religious beliefs or your health).

b. If you fail to provide personal data

If you are registering your interest in our organisation, but do not provide us with relevant and accurate contact details, this will affect our ability to contact you in order to progress your enquiry and take steps to enter a potential contract with you (if applicable). We will therefore not be able to take your enquiry further.

4. How your personal data is collected

a. Different methods

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

- Direct interactions – You may provide us with your identity and contact details by filling in a form through our website, in which you express your interest to

contact us. This may include personal data which you provide when you carry out the following:

- Make an enquiry.
- Register your interest in our organisation (for example, if you wish to form a relationship with us).
- Request marketing to be sent to you; or provide feedback to us.
- Automated technologies or interactions – As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies.

b. Purposes for which we will use your personal data

We have set out below a description of the ways we plan to use your personal data:

- To register your enquiry and interest and arrange a response to you.
- To manage our relationship with you.
- To deliver relevant website content.
- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- To carry out market research.
- To improve our website, products/services, marketing, customer relationships and experiences.

5. How we use your personal data

a. Basis for using your information 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 take steps to enter a potential contract 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.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your information. Where it is necessary for our legitimate interests to use your personal data, we have listed below what our legitimate interests are:

- Internal record keeping.
- 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.
- To define types of customers for our products and services.
- To study how customers use our products/services.
- To grow our business, to develop our products/services and to inform our marketing strategy.
- To keep our website updated and relevant.

We would rely on consent as a legal basis for processing your personal data if we are sending marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

b. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.

You will receive marketing communications from us if you have requested such information from us and you have not opted out of receiving that marketing. You can ask us to stop sending you marketing communications at any time by contacting us.

c. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see Our Cookie Policy.

d. 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 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.

6. Disclosures of your personal data

We may need to share your personal data with certain parties for the purposes set out above. We have listed those third parties as follows:

- Other companies in our group for reasons such as IT and system administration services as well as reporting activities.
- Service providers who support our website or supply IT and system administration services.
- Partnering organisations or other entities which assist us to provide or improve our services (for example, by analysing and modelling statistics/data).
- Regulators, police, government bodies or to otherwise comply with the law.

We require all third-party service providers and other entities in the group 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. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

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

Unless we notify you otherwise in writing, we will 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.
- For as long as someone could bring a claim against us; and
- Retention periods in line with legal and regulatory requirements or guidance.

9. Your rights in connection with personal information

We have detailed below a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances and we will explain in writing whether they do, at the time you wish to exercise any of these rights.

- The right to be informed about the processing of your personal information.
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed.
- The right to object to processing of your personal information.
- The right to restrict processing of your personal information.
- The right to have your personal information erased (the “right to be forgotten”).
- The right to request access to your personal information and to obtain information about how we process it.
- The right to request the transfer of your personal information to another party

(“data portability”).

If you wish to exercise any of these rights, please contact us.

You also have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner's Office so, please contact us in the first instance.