## **Privacy Policy**

At Sleep Well Easy (HSK Invest LTD) ("we", "us") we're committed to protecting and respecting your privacy.

As of the 25 May 2018 the General Data Protection Regulation (GDPR) was enforced across Europe.

This Policy explains when and why we collect personal information about people who visit our website or who speak to us over the telephone, via e-mail or online, how we use it that data, the conditions under which we may disclose it to others, and how we keep it secure.

We may change this Policy from time to time so please check with to ensure that you're happy with any changes. By registering your details with us, you're agreeing to be bound by this Policy.

#### Who are we?

We're Sleep Well Easy (HSK Invest LTD) Limited, << registered office address 128 City Road, London EC1V 2NX>> (company number << 14543676 >>)

Our Data Control contact is info@sleepwelleasy.co.uk

#### Why don't we have a Data Protection Officer?

Under the GDPR, you must appoint a DPO if:

- you are a public authority (except for courts acting in their judicial capacity);
- your core activities require large scale, regular and systematic monitoring of individuals (for example, online behaviour tracking); or
- your core activities consist of large scale processing of special categories of data or data relating to criminal convictions and offences.

At Sleep Well Easy (HSK Invest LTD), our requirements are fairly simple and we don't engage in the large scale processing of data.

Therefore we don't employ a specialist Data Protection Officer, however if you do have any questions then please contact Data Control on <a href="mailto:data@restyourhead.co.uk">data@restyourhead.co.uk</a>

# How do we collect information from you?

We obtain information about you when you use our website, when you contact us by e-mail or telephone about our products and services, or if you register to receive one of our newsletters or e-mail updates.

## What type of information is collected from, or about, you?

The personal information we collect might include your name, address, email address, IP address, information regarding what pages are accessed and when.

If you purchase a product or service from us and pay by card, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

#### How is your information used?

We may use your information to:

- process orders that you have submitted;
- carry out our obligations arising from any contracts entered into by you a relating tothe letting of long and short term properties and sales (or such as keeping you informed about any valuation or negotiation we are undertaking on your behalf);
- dealing with entries into a competition;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications which you have requested and that may be of interest to you;
- activities, promotions of our associated companies goods and services;
- process a job application.
- To follow up with you during the enquiry process

## How long do we keep your information?

Sleep Well Easy (HSK Invest LTD)keeps our files for a minimum of 6 years, however the Limitation Act 1980 provides for a period of up to 15 years for a professional negligence claim.

We are legally required to hold some types of information to fulfil our statutory obligations (for example, to comply with anti-money laundering regulations). We will hold your personalinformation on our systems for as long as is necessary for the relevant activity, or as long asis set out in any relevant contract you hold with us.

We review our retention periods for personal information on a regular basis.

#### Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf:

We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to manage a short-let booking, a long let tenancy or any ancillary property matter that we have been instructed to administer). However, 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 not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond our network for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

#### Our website:

When someone visits www.restyourhead.co.uk we use two third party services, Google Analytics, and Hotjar, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google or Hotjar to make, any attempt to find out the identities of those visiting our website.

Further information can be found from Google and Hotjar themselves:

https://privacy.google.com/businesses/compliance/

https://www.hotjar.com/legal/policies/privacy

## **MailChimp:**

MailChimp is an email marketing tool, used to send anyone signed-up to our mailing list newsletters and other promotions. When you sign up to the mailing list on restyourhead.co.uk, your name and email address are stored within MailChimp and, by using our sign-up form, you have consented to receiving marketing material via email from Sleep Well Easy (HSK Invest LTD). Additionally, limited new customer data (name and email address) will be passed into MailChimp so that we can more accurately communicate with you in the future.

A full copy of MailChimp's GDPR policy may be obtained from <a href="https://mailchimp.com/legal/">https://mailchimp.com/legal/</a> privacy

#### Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the work we do for short and long term lettings, leaseholders, freeholders and property owners, then you can confirm your approval by ticking the box on the form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email: <a href="mailto:data@restyourhead.co.uk">data@restyourhead.co.uk</a>

## How you can access and update your information

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you

change email address, or any of the other information we hold is inaccurate or out of date, please email us at: <a href="mailto:data@restyourhead.co.uk">data@restyourhead.co.uk</a>, or write to us at: Sleep Well Easy (HSK Invest LTD), 9 Springhill Road, Dawley, Telford, TF4 3DG. Alternatively, you can telephone 01952 370 064

You have the right to ask for a copy of the information Sleep Well Easy (HSK Invest LTD) holds about you, or for us to rectify and erase personal data, and restrict or object to processing at any time. However, this may have implications on how we deliver our services to you. We will alert you if we are unable to continue working for you if our obligations to you under GDPR will prevent us in providing such services.

Where you have requested access to the data we hold, we will provide it to you within 1 month of us making a request, and we do not make a charge for this.

Security precautions in place to protect the loss, misuse or alteration of your information

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmitto us, and you do so at your own risk. Once we receive your information, we make our besteffort to ensure its security on our systems.

#### Transferring your information outside of Europe

As part of the services offered to you, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU.

These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferredoutside the EU in order to provide you with those services.

#### The Information Commissioner's Office

If you wish to lodge a complaint with the supervisory authority, you can do so here: <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>