**Horton and Garton - Privacy Policy**

Horton and Gartontake your privacy very seriously. We respect your privacy and want you to understand how we use the personal information that we hold about you.

We ask that you read this privacy policy carefully as it contains important information about what to expect when Horton and Garton collects personal information about you and how Horton and Garton will use your personal data.

This policy applies to information we collect about:

* **•** visitors to our website or people who enquire about our business and properties we list
* **•** people who do business with us
* **1 The information we collect about you**
	+ When you do business with us, we collect the following personal information from you:
	+ **1.1** your name;
	+ **1.2** your contact details, including:email address, telephone number, and postal address(es) associated with your account;
	+ **1.3** details of the services received or to be received from us;
	+ We will also collect some or all of the following information, as relevant to the provision of the services that you receive from us:
	+ **1.4** payment information, including: bank account details, credit card number and expiry date, proof of funds;
	+ **1.5** information relating to the ownership of the property;
	+ **1.6** information relating to the layout of your property (floor plans and photos);
	+ **1.7** information about the appliances and devices in your property and their warranties;
	+ **1.8** information about the access to the property (keys, codes etc.);
	+ **1.9** records of your discussions with our employees, whether oral or written (including through our social media platforms), including: comments and opinions that you may share about the provision of the services, complaints you may make or questions you may ask. Telephone conversations may be recorded for training purposes, and to allow us to improve our services.

You are not obliged to provide to us any of the above personal information; however, we may not be able to provide you with all our services if the necessary information is not received.

In addition to collecting information directly from you (such as when you create your account, use any of our products or services, or otherwise contact us), we may also collect information from third party products and apps (LetMC, Tenant Shop, FixFlo etc.) when you use them in connection with our services.

* **2 How we will use the information about you**
* We gather this information to allow us to process your registration, process any requests you may make (including to take payment), provide the services requested, and maintain your account. The relevant information is then used by us, our agents and sub-contractors to provide you with statements of your account, and to communicate with you on any matter relating to the conduct of your account and the provision of the services.

We will also use your information to respond to your questions and complaints, and to investigate and respond to any misuse or abuse of your account (including fraud).

* If you agree, we may also contact you about other products and services we think may be of interest to you, based on our review of your information.
* From time to time we may use information about how you use our products and services, and/or provide it to our customer service agencies, for research and analysis purposes so that we can monitor and improve the services that we provide. We or our agents and sub-contractors may contact you by post, email or telephone to ask you for your feedback and comments on the services you receive or used to receive from us.
* We may also use aggregate information and statistics for the purposes of monitoring the use of our services and our website usage, in order to help us understand how they are used and to develop and improve them, and we may provide such aggregate information to third parties. These statistics will not include information that can be used to identify you.
* In addition to those mentioned above, we may share personal information with the following:-
* **•** other companies in our franchise group trading as Horton and Garton, in order to provide the services to you;
* **•** third party installers, engineers and delivery companies, to enable them to provide their services to you in respect of our products;
* **•** other providers of services to us, including companies that: provide IT support, process payments; analyse data; provide financial or legal advice; send communications to customers; engage in market research;
* **•** regulators, local government councils, other government bodies, or law enforcement, where we are required to do so.
* **3 Marketing**

Horton and Garton may also wish to provide you with information (via email, text, push notification, mail or telephone) about any other service or products we think may be of interest to you, in accordance with your preferences. If you would rather not receive this information, please send an email message to **office@hortonandgarton.co.uk** or contact our team. If you agree to us providing you with marketing information, you can always opt out at a later date.

* **4 Our use of cookies and other information-gathering technologies**
* Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information; we use cookies and other similar technologies in relation to our website. The information is used to track visitor use of the website and to compile statistical reports on website activity. For further information about cookies visit *www.aboutcookies.org* or *www.allaboutcookies.org*. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function if you remove cookies from your browser.
* **5 How we protect your information**
* We have put in place the following security procedures and technical and organisational measures to safeguard your personal information: Data is stored on the Cloud Platform servers located in EU, protected by passwords and a firewall preventing access by any protocol apart from HTTPS and SSH. SSH access is only allowed using authorised RSA keys.
* We will use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.
* **6 Overseas transfers**
* The information you provide may be transferred to countries outside the European Economic Area (**EEA**) that do not have similar protections in place regarding your data and restrictions on its use as set out in this policy, including the United States of America. However, we will take all reasonable steps to ensure adequate protections are in place to ensure the security of your information when transferred to these countries. By submitting your information you consent to the transfer, processing or storage of information outside of your country and outside the EEA for the purposes specified above.
* The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.
* **7 Access to your information and updating and correcting your information**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please send a request to **office@hortonandgarton.co.uk** and book an appointment with us to visit our office and collect the copies in person. We may make a small charge for this service.

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to Horton and Garton changes (for example if you change your email address, name or payment details), or if you wish to cancel your registration, please let us know the correct details by sending an email to **office@hortonandgarton.co.uk****.** You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

* **8 Your rights regarding your information**

Including as stated above, you have the following rights with regard to your personal information:

* **•** the right to access your personal information that we hold;
* **•** the right to be informed how your personal information is used;
* **•** the right to request corrections to inaccuracies in your personal information that we hold;
* **•** the right to request that we cease to hold certain of your personal information, understanding that this may cause the functionality of our products may be reduced, or to not be usable at all;
* **•** the right to opt out of receiving direct marketing messages.

To exercise any of the above rights, please contact us as set out in Sections 7 and 3 above.

You also have the right to contact the UK Information Commissioner’s Office (or your local data protection regulator) if you are unhappy with how we are using your personal information, though we encourage you to contact us first, where we will do our best to address your concerns.

* **9 How long we keep your personal information**
* We will retain your personal information for the duration of your account with us. After you close your account, we will retain your personal information for a reasonable period, in order to fulfil our contractual and legal obligations to you, and to maintain our records.
* **10 Your consent**
* By submitting your personal information you consent to the use of that information as set out in this policy.
* **11 Changes to privacy policy**
* We keep our privacy policy under regular review. If we change our privacy policy we will post the changes on this page, and place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times. We will indicate any material changes by updating the version date in this Section 11. This privacy policy was last updated on 1/5/2018.
* **12 How to contact Horton and Garton**

We welcome your views about our website and our privacy policy. In addition to as set out in Sections 3 and 7, if you would like to contact us with any queries, comments or complaints, please send an email to **office@hortonandgarton.co.uk**.

* **13 Service notifications**
* Some of our apps may send service notifications directly to your electronic device (through the relevant app, by email and/or by text, in accordance with your preferences) when we have something important or of interest to share with you, or where you have asked to be notified of events relating to the operation of the system at your property. At any time you can turn off service notifications through the relevant app, through your online account or via the system settings of your electronic device.
* **14 Links to other websites**
* Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.
* **15 Sale of business**
* If Horton and Garton’s business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.