

CERT Privacy Policy EULA 2024

We respect your privacy and understand that privacy is important to you and that you care about how information about you is used, so this privacy notice sets out details about what data we collect and how we use it.

This policy, together with our end-user licence agreement (EULA), and any additional terms of use incorporated by reference into the EULA, along with our Terms of Use, applies to your use of:

- The CERT Life App mobile application software (App) - applicable once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (Device).
- Any of our services provided through the App (Services).

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This policy is provided in a layered format so you can click through to the specific areas set out below.

IMPORTANT INFORMATION AND WHO WE ARE

THE DATA WE COLLECT ABOUT YOU

HOW IS YOUR PERSONAL DATA COLLECTED?

HOW WE USE YOUR PERSONAL DATA

DISCLOSURES OF YOUR PERSONAL DATA

INTERNATIONAL TRANSFERS

DATA SECURITY

DATA RETENTION

YOUR LEGAL RIGHTS

GLOSSARY

DESCRIPTION OF CATEGORIES OF PERSONAL DATA

Important information and who we are

Our data protection registration number is ZA323338.

CERT property Limited is the controller and is responsible for your personal data (collectively referred to as "Company", "we", "us" or "our" in this policy).

We have appointed a data protection officer (DPO). If you have any questions about this privacy policy, please contact them using the details set out below.

Contact details

Our full details are:

- Full name of legal entity: CERT property Limited; Company No: 05869097; Registered Office: Hilton House, 26 - 28 Hilton Street, Manchester, England, M1 2EH
- Name or title of DPO: Gemma Tomlinson, Head of Marketing
- Email address: info@certproperty.co.uk
- Postal address: CERT, 4th Floor, Hilton House, 26-28 Hilton St, Manchester M1 2EH

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

This privacy policy may change, and if it does these changes will be posted on this page and, where appropriate, notified to you by SMS, or by email, or when you next start the App or log onto one of the Services Sites. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services.

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 our relationship with you.

Third party links

Our App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as Contact and Location Data. Please check these policies before you submit any personal data to these websites or use these services.

The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data.

- Contact Data.
- Financial Data.
- Profile Data.
- Usage Data.
- Marketing and Communications Data.

We explain these categories of data here.

We also collect, use and share Aggregated Data such as usage data for our purposes. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App 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 policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How is your personal data collected?

We will collect and process the following data about you:

- Information you give us. This is information (including Identity, Contact, Financial, and Marketing and Communications Data) you consent to giving us about you by filling in forms on the App, or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use the App or any of our Services and when you report a problem with the App or our Services. If you contact us, we will keep a record of that correspondence.
- Information we collect about you and your device. Each time you use the App we will automatically collect personal data including Device, Content and Usage Data. We collect this data using cookies and other similar technologies. Please see our cookie policy for further details.

Cookies

We use cookies [and/or other tracking technologies] to distinguish you from other users of the App, App Site, the distribution platform (Appstore) or Services Sites and to remember your preferences. This helps us to provide you with a good experience when you use the App or browse any of Our Sites and also allows us to improve the App and Our Sites. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our cookie policy.

How we use your personal data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered 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.

Click here to find out more about the types of lawful basis that we will rely on to process your personal data.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Purposes for which we will use your personal data:

Purpose/activity	Type of data	Lawful basis for processing
To install the App and register you as a new App user	Identity Contact Financial	Your consent
To process in-App purchases and deliver Services including managing payments and collecting money owed to us	Identity Contact Financial Transaction Marketing and Communications	Your consent Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you including notifying you of changes to the App or any Services	Identity Contact Financial Profile Marketing and Communications	Your consent Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)
To enable you to participate in a prize draw, competition or complete a survey	Identity Contact Profile Marketing and Communications	Your consent Performance of a contract with you Necessary for our legitimate interests (to analyse how customers use our products/Services and to

		develop them and grow our business)
To administer and protect our business and this App including troubleshooting, data analysis and system testing	Identity Contact	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)
To deliver content and advertisements to you To make recommendations to you about goods or services which may interest you To measure and analyse the effectiveness of the advertising we serve you To monitor trends so we can improve the App	Identity Contact Profile Usage Marketing and Communications	Consent Necessary for our legitimate interests (to develop our products/Services and grow our business)

Disclosures of your personal data

When you consent to providing us with your personal data, we will also ask you for your consent to share your personal data with Internal & External third parties as set out in the Glossary, for the purposes set out in the table above, Purposes for which we will use your personal data.

International transfers

We do not transfer your personal data outside the UK or the EEA.

Data security

All information you provide to us is stored on secure servers located in the EEA. Any payment transactions will be carried out by us or our chosen third-party provider of payment processing services. Where we have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

While we strive to implement and maintain the highest standards of security, it's important to note that no method of transmission over the internet or electronic storage is entirely secure. Therefore, we cannot guarantee absolute security. However, we are committed to continuously improving our security measures to protect your personal information.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

Data retention

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request by contacting us.

In some circumstances you can ask us to delete your data: see Your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

In the event that your tenancy ends (or you cease to provide services to the App community) then we will treat the account as expired and your personal data may be deleted.

Your legal rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer or your personal data.
- Right to withdraw consent

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us at CERT, 4th Floor, Hilton House, 26-28 Hilton St, Manchester M1 2EH OR info@certproperty.co.uk.

Glossary

Lawful basis

Consent means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests

are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Third parties

Internal third parties

Internal group companies such as the companies that own the properties which are being managed by us.

External third parties

Service providers acting as processors based in Prague, who provide IT and system administration services.

Service providers who will provide you with goods or services directly and who we pass your personal data to as a data controller. They will process your data on the basis of their own privacy policies.

Your legal rights

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

(a) if you want us to establish the data's accuracy;

(b) where our use of the data is unlawful but you do not want us to erase it;

(c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

(d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Description of categories of personal data

- Identity Data: first name, last name, maiden name, username or similar identifier.
- Contact Data: apartment number, billing address, delivery address, email address and telephone numbers.
- Financial Data: bank account and payment card details.
- Transaction Data: includes details about payments to and from you and details of in-App purchases.
- Profile Data: includes your username, your hobbies and interests, preferences, feedback and survey responses.
- Usage Data: includes details of your use of any of our Apps or your visits to any of Our Sites including, but not limited to, traffic data [and other communication data],] whether this is required for our own billing purposes or otherwise [and the resources that you access.
- Marketing and Communications Data: includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Version	Date	Author	Status	Comments
v1	22nd December 2023	Gemma Tomlinson, Head of Marketing.	Live	Privacy policy coinciding with the launch of the CERT Life App.