

PPNUK

PULSE PROPERTY NETWORK

Privacy Notice

V. 1.4 FEBRUARY 2023



Privacy Notice v. 1.4

Data Controller: Pulse Property Network (PPN UK), Mancor House, Bolsover Street, Hucknall, Nottingham. UK. NG15 7TZ. Tel. No. +44 (0) 115 917 9287.

The PPN UK group of companies includes Portfolio Builder and Property Entrepreneur.

PPN UK takes your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about what to expect when we collect personal information about you and how we will use your personal data.

How we use your personal information

This privacy notice is to let you know how companies within the Group promise to look after your personal information. This applies to visitors to our websites, people who do business with us or register to receive information about us and/or the products and services we provide.

This includes what you tell us about yourself, what we learn by having you as a client, and the choices you give us about what information you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you. Occasionally we may also receive information about you from other sources (such as credit reference agencies) which we will add to the information which we already hold about you in order to help us provide our services, deal with your inquiries and requests and administer contracts.

Our Privacy Promise

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to manage and review your marketing choices at any time.

Data Protection law changed on 25 May 2018 and was further amended on 01 January 2021 by regulations under the European Union (Withdrawal) Act 2018 to reflect the UK's status outside the EU. This notice sets out your rights under the new laws. We may update it again when and if more changes come into effect.

If you have any questions, or want more details about how we use your personal information, you can ask us by emailing privacy@ppn.co.uk or you can call us on Tel. No. +44 (0) 115 917 9287.

PRIVACY NOTICE

How the law protects you

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works. Data Protection law says that we are allowed to use personal information only if we have a lawful reason to do so. This includes sharing it outside the PPN UK group of companies.

The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on. This is also where we tell you what our legitimate interests are.

What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none">• To manage our relationship with you• To develop and carry out marketing activities	<ul style="list-style-type: none">• Your consent• Fulfilling contracts• Our legitimate interests• Our legal duty	<ul style="list-style-type: none">• Keeping our records up to date• Developing products and services• Seeking your consent when we need it to contact you
<ul style="list-style-type: none">• To develop and manage our brands and services• To test new products	<ul style="list-style-type: none">• Fulfilling contracts• Our legitimate interests• Our legal duty	<ul style="list-style-type: none">• Developing products and services, and what we charge for them• Being efficient about how we fulfil our legal and contractual duties

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<ul style="list-style-type: none"> • To deliver our products and services • To make and manage payments • To manage fees and charges • To collect and recover money that is owed to us 	<ul style="list-style-type: none"> • Fulfilling contracts • Our legitimate interests • Our legal duty 	<ul style="list-style-type: none"> • Being efficient about how we fulfil our legal and contractual duties • Complying with regulations that apply to us
<ul style="list-style-type: none"> • To obey laws and regulations that apply to us • To respond to complaints and seek to resolve them 	<ul style="list-style-type: none"> • Fulfilling contracts • Our legitimate interests • Our legal duty 	<ul style="list-style-type: none"> • Complying with regulations that apply to us • Being efficient about how we fulfil our legal and contractual duties

Groups of Personal Information

We use many different kinds of personal information, and group them together like this.

Type of personal information	Description
Contact	Where you live and how to contact you
Socio-Demographic	This includes details about your work or profession
Contractual	Details about the products or services we provide to you
Communications	What you provide within your letters, emails and conversations with us

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Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include ID documents such as your passport, drivers licence or birth certificate
Special types of data	Legislation treats some types of personal information as special. We will only collect and use these types of data if the law allows us to do so: <ul style="list-style-type: none">• Religious or philosophical beliefs• Racial or ethnic origin• Health data• Gender• Criminal convictions and offences
Consents	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you
National Identifier	A number or code given to you by the government to identify who you are, for example your National Insurance number.

Where we collect personal information from Data you give to us:

- When you request information on our products and services
- When you make an application to use one of our services
- When you talk to us on the phone some calls may be recorded for training and monitoring purposes
- When you talk to us in person
- When you use our websites to request a service or information
- In emails and letters
- When you request payments or submit invoices

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Use of cookies by PPN UK

When you visit any web site, it may store or retrieve information on your browser, mostly in the form of cookies. This information might be about you, your preferences or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalised web experience. Because we respect your right to privacy, you can choose not to allow some types of cookies used which are:

- Performance cookies
- Functional cookies
- Targeting cookies

We use some non-essential cookies to anonymously track visitors or enhance your experience of this site.

You may change our default cookie settings. However, blocking some types of cookies may impact your experience of the site and the services we are able to offer.

Most web browsers allow some control of most cookies through the browser settings or installation of opt-out browser plug-ins. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

By continuing to use this website you accept the terms of the PPN UK Privacy Policy.

Who we share your personal information with

We may share your personal information with companies within the PPN UK group of companies in order that we can provide the required services. We may also need to share your data with other organisations, for example:

- Regulators and other authorities
- Credit reference agencies
- Any party linked with you or your business's product or service
- Companies we have a joint venture or agreement to co-operate with
- Organisations that introduce you to us
- Companies that we introduce you to
- Companies you ask us to share your data with

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- Internet hosting providers to host our websites
- Contact management systems to send emails, instant messages, social media messages and SMS messages, currently our providers are Less Annoying CRM, Mailchimp, WhatsApp, Google, TextMagic, Facebook
- Service providers: for example payment processors, accountants, supply chain partners and subcontractors and IT services
- There are certain exceptional circumstances in which we may disclose your information to third parties. This would be where we believe that the disclosure is:
 - Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings
 - Necessary to protect the safety of our employees, our property or the public
 - Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.
- Proportionate as part of a merger, business or asset sale, in the event that this happens we will share your information with the prospective seller or buyer involved.

We require all third parties 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 and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Sending data outside of the EEA

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure. Where a third part processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws.

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We will only send your data outside of the UK and European Economic Area ('EEA') to:

- Follow your instructions.
- Comply with a legal duty
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the UK, Europe and the US. For further details, see [European Commission: EU US Privacy Shield](#)

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform the services we are contracted to. Any data collection that is optional would be made clear at the point of collection.

Marketing

We may use your personal information to tell you about relevant products or services we offer. The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time. Whatever you choose, you'll still receive important information such as changes in the service we provide to you.

When you unsubscribe from our Newsletters, your details remain on the list of past recipients. This is a measure to prevent circumstances such as a team member accidentally manually re-adding you. As a compliance measure, subscribers who unsubscribe themselves can't be deleted from the list. However, provided you are still a subscriber at the point when you contact PPN UK, on request your details can be permanently removed from the list – please get in touch if you would like this to happen.

We may ask you to confirm or update your choices if there are changes in the law, regulation or our business.

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If you change your mind you can update your choices at any time by contacting us.

How long we keep your personal information

We will keep your personal information for as long as you are a client of any of the PPN UK group of companies.

After you stop being a client, we may keep your data for up to 10 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons.

How to get a copy of your personal information, update or correct your information

If you wish to obtain a copy of the data we hold on you, you must first complete a Subject Access Request Form. This can be requested by emailing the Data Protection Officer at privacy@ppn.co.uk or send a written request by post to the Data Controller, PPN UK, Mancor House, Bolsover Street, Hucknall, Nottingham. UK. NG15 7TZ.

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to PPN UK changes, for example if you change your email address, contact address or name, please let us know the correct details by sending an email to privacy@ppn.co.uk or send a letter to the Data Controller, PPN UK, Mancor House, Bolsover Street, Hucknall, Nottingham. UK. NG15 7TZ.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

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You can ask us to restrict the use of your personal information if:

- It is not accurate
- It has been used unlawfully but you don't want us to delete it
- It is not relevant any more, but you want us to keep it for use in legal claims
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please contact us.

How to withdraw your consent

You can withdraw your consent at any time. Please contact us on privacy@ppn.co.uk if you want to do so. If you withdraw your consent, we may not be able to provide certain services to you. If this is so, we will tell you.

Data breaches

If we discover that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals, we will report it to the Information Commissioner within 72 hours of discovery.

If the breach is likely to result in a high risk to your rights and freedoms, we will tell affected individuals that there has been a breach and provide them with more information about its likely consequences and the mitigation measures it has taken.

Changes to our Privacy Notice

We take all steps reasonably necessary to keep our Privacy Notice under regular review and up to date.

How to contact us

Please contact us if you have any questions about this Privacy Notice or the information we hold about you. Please let us know if you are unhappy with how we have used your personal information by emailing your concerns or questions to our Data Protection Officer on privacy@ppn.co.uk. You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern <https://ico.org.uk/make-a-complaint/>.

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+44 (0) 115 917 9287

Info@PPN.co.uk

www.PPN.co.uk

Registered in England & Wales No. 08413552