

At Portabella, we take the safety of your personal data very seriously. We are committed to minimising the amount and types of data we hold about you to the strictly necessary, and restrict any marketing to just the occasional newsletter or Twitter comment. We also want to be transparent about how we use your details, and where we store them. You can find the official legal bits under this introduction, but you can find a candid explanation below that we hope you find clear and useful.

HOW WE GET YOUR DETAILS, AND WHAT WE DO WITH THEM:

Our office computers/laptops are password protected, and so are our phones. We use encryption in our email communications, and never use portable devices like hard drives to store personal data. We follow a clean desk policy, and any paper documents are kept out of sight when we are not in the office.

We do not carry out cold calling. If you are a **potential customer**, you will be contacting us directly from:

- **A third party website (Estate Agents or Rightmove).** We do not own these websites, but when you submit a contact form enquiring about any of our properties, we receive an email from them through GSuite (the professional Gmail), which is GDPR compliant. Your basic contact details are then entered manually to an Excel database in Box, a cloud storage and collaboration tool based in the UK. Only selected employees in our office have access to our Box account. One of us will get in touch with you using GSuite, or a mobile phone (probably Apple, who are not GDPR compliant, but they're working on it).
- **One of our websites (Portabella, Brickworks, Arbor Vale).** Our websites use cookies which are small files which track specific data. We do not use this information to identify you, the purpose is to ensure the website runs correctly and you can enjoy its wonderful design. We have installed Google Analytics to track our site's performance and improve the way we communicate with you, so we will have access to data designed to help us improve performance and user experience but which are not used to identify you. If you submit a form, we receive an email on Gsuite and follow the same process as above.
- **Phone:** we will enter your details in Box, and follow the process above.

During the sales process, until we all sign contracts and you receive the keys to your new home, some third parties will either need us to share your details with them, and sometimes will contact you directly as part of the contract fulfilment: accountants, lawyers, building site contractors are some examples. If we are the ones actively sharing your contact details, we will always follow our strict guidelines for data transfers, ensuring it will be done safely: using GDPR compliant software (Dropbox professional, Gsuite), or doing so in person. Our contractors and suppliers are asked to sign a processor agreement with us which ensures they are also aware of GDPR and compliant.

Once you become an owner, we store only the minimum contact details from you, to alert you if an emergency arises, or to put you in touch with a contractor (property managers, plumbers, electricians, etc.).

If you are a **supplier or contractor**, we will also use the payment system Sage (based in the US, part of the EU-US Privacy Shield) to process your details and carry out payments.

MARKETING: we may contact you if you have expressed interest in our services in the past; we understand you have a legitimate interest in what we do, and we have an interest in getting in touch occasionally if we have news to share. You can unsubscribe from our marketing emails at any time. For these emails we use MailChimp, based in the US, and part of the EU-US Privacy Shield.

For marketing communications after the 25th May 2018, we will store your opt-in details in Box, next to your email address. You can also unsubscribe at any time, from the link in all our newsletters. If you follow us on Facebook, Instagram or Twitter, we base our communications with you on consent. You only have to 'unfriend' us if you do not want to hear from us through these platforms.

If you would like more details about how we are working towards GDPR compliance, please see the full Data Privacy Policy below, or email us at info@portabella.co.uk

- PORTABELLA GROUP DATA PRIVACY POLICY -

This privacy notice provides you with details of how we collect and process your personal data through your use of our sites www.portabella.co.uk, <http://brickworkscardiff.co.uk>, <http://arborvale.co.uk> including any information you may provide through our site when you request a contact or service, or sign up to our newsletter. By providing us with your data, you warrant to us that you are over 13 years of age.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

The Portabella Group is the data controller and we are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

Full name of business entity: Portabella Group [Tucasa Ltd., Arbor Vale Ltd., Lower West Side Ltd., South Central Cardiff Ltd.]

Postal address: 1, Pontcanna St. CF11 9HQ, Cardiff

Data Controller: Peter Reilly

Email address: info@portabella.co.uk

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at info@portabella.co.uk

1. THE DATA WE COLLECT ABOUT YOU

During our commercial relationship, we may process the following:

- **Identity:** first name, maiden name, last name, title.
- **Contact:** your new home address, email address and telephone numbers.
- **Financial:** your bank account and budget details.
- **Transaction:** details about payments between us and other details of purchases made by you.
- **Technical:** login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Usage Data** may include information about how you use our website, products and services.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

Sensitive Data

Sensitive data refers to data that 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, or information about criminal convictions and offences. We do not collect any sensitive data about you.

2. HOW WE COLLECT YOUR DATA

We use a variety of methods:

Direct interactions: You may provide data by filling in forms on our site, on a partner's site, or by communicating with us by post, phone, email or otherwise, including when you:

- purchase our products or services
- request specific information or marketing be sent to you
- enter a competition, promotion or survey
- give us feedback

Automated technologies or interactions: As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies. **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties: Wordpress, Google Analytics
- Analytics providers such as Google based outside the EU;
- Identity and Contact Data from Rightmove UK and local Estate Agents, such as Burnett Davies with Easton, Savills, Jeff Hopkins Estate Agent, Shepherd Sharpe Penarth, Herbert R Thomas (HRT) Cowbridge, Jeff Hopkins Estate Agents, Maison, Jeffrey Ross, Hern and Crabtree, all based in the UK.
- Identity data (name, surname) from social media platforms like Facebook and Twitter, based outside the EU.

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- 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.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or social media. You have the right to withdraw consent to marketing at any time by emailing us at info@portabella.co.uk, or eliminating Portabella from your contacts on social media.

Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at info@portabella.co.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To contact you after you've expressed interest in our product or service, or to register you as a new owner.	(a) Identity (b) Contact	Performance of a contract with you
To process your purchase: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests 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 (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To contact you and the relevant services in case of an emergency in any of our developments	(a) Identity (b) Contact	Necessary to protect your vital interests

Marketing communications

You will receive marketing communications from us if you have:

- I. Requested information from us or purchased goods or services from us; or
- II. If you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- III. In each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. You can ask us or third parties to stop sending you marketing messages at any time by clicking on the unsubscribe links from any of our newsletters, or by emailing us at info@portabella.co.uk at any time.

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, or other activities described by common law regulations that require us to keep your details on file.

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 a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing. We may process your personal data without your knowledge or consent where this is required or permitted by law.

4. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Any companies in our group providing IT and system administration services.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

5. INTERNATIONAL TRANSFERS

Countries outside of the European Economic Area (**EEA**) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria. Some of our third parties service providers are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

6. 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 such data. 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.

7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- 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 of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please email us at info@portabella.co.uk

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. 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 statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

10. 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.

