

Kestrel Inventories

Privacy Policy

1. INTRODUCTION

This Privacy Statement applies to the processing by Kestrel Inventories (Kestrel Inventories Ltd) of your personal data. Kestrel Inventories takes your privacy very seriously and treats all your personal data with great care. Kestrel Inventories acts in accordance with the applicable data protection legislation.

When you visit our website (www.kestrelinventories.com), contact us via email or over the phone to make a booking, or when a booking is made on your behalf or via a third party estate agent, we may collect information from and about you. Some of the information we collect may be classed as personal data under data protection legislation, that is, “any information relating to an identified or identifiable natural person”. It may be collected any time you submit it to us, whatever the reason may be.

This Privacy Statement describes which personal data is collected and for which purposes this personal data is processed by Kestrel Inventories. It also states which rights you have under applicable data protection legislation.

PARTICULARLY IMPORTANT INFORMATION

WHO WE ARE: For the purpose of applicable data protection legislation, the data controller of your personal data is Kestrel Inventories Ltd of 5 East Lane, London SE16 4UD.

MUST READ SECTIONS: We draw your attention in particular to the sections entitled “**International Data Transfers**” and “**Your Rights.**”

2. COLLECTING YOUR PERSONAL DATA

Kestrel Inventories (‘Kestrel Inventories Ltd’) collects information about you in the following ways.

Information you give to us. This includes personal data collected:

- When you contact our office to make a booking for one of our services or when a booking is made or via a third party estate agent. Services include, but are not limited to: inventory compilation, tenant check-in, tenant check-out, and interim inspections.
- When we do business with you, which will usually include:
 - Full or partial contact details including names and addresses (including business details if you are booking as an agency), telephone and email details.

Through our Website. Kestrel Inventories does not employ analytics of any description, nor does it collect information through the use of cookies and/or log information. However, the information about your use of the Kestrel Inventories website may be monitored by our web host (Webs.com) whose use of tracking technologies is subject to their own privacy policies.

3. WHY DO WE PROCESS YOUR PERSONAL DATA?

Your personal data (name, phone number, address and email) will be stored in (i) a centralized password protected computer which is accessible and under the control of a singular administrator of Kestrel Inventories. Your personal documents (archived copies of historic inventory reports, check-ins, check-outs and interim inspections) will be stored and backed up on encrypted cloud based servers and solely accessed by a singular administrator of Kestrel Inventories.

We use the information we collect about you to process your bookings, answer your queries, and provide reference reports for future visits to your properties. This information will only ever be used in relation to services requested by yourself and held only as long as is required for us to fulfil the designated assignment. Your information will never be used by Kestrel Inventories to contact you for marketing or sales purposes.

We mainly collect, store and process personal data at two different stages: (i) when you arrange a booking and (ii) after we have fulfilled your specific instructions.

i. When you arrange a booking

When you make a booking via email, over the phone or via a third party estate agent, we collect information about you in order to perform particular assigned duties. This is entirely comprised of information we collect directly from you, and or agents acting on your behalf. Kestrel Inventories does not collect information about your behaviour. Nonetheless, this information may constitute 'personal data' under applicable law. We use this information to provide you with specific service(s) at a specific time as agreed to and instructed by yourself.

Advertising

We do not participate in advertising of any description.

ii. After we have fulfilled your specific instructions

When you or an agent on your behalf make a booking, we will require your name, email address, phone number, address of property and the dates our services are required. We use this personal data to process and fulfil the booking, for billing purposes, to deliver reports, and to allow us to communicate with you (or your agent) in ways related to the execution of our role as a service provider.

Overview of activities under stage (i) and (ii):

We may at each of the stages outlined above, use your personal data but only when and to the extent the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into 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.
- Where you have provided your consent.

For your convenience, we have made an overview of activities that involve the processing of your personal data, and the corresponding legal basis/legal bases that allow us to process this data:

	Purpose/activity	Legal basis
1.	First of all, we store the personal data you provide to us in our systems for administrative purposes.	<ul style="list-style-type: none"> • enter into or perform a contract to which you are a party
2.	We store your personal data in our database, also after your transaction has been completed and after a service has been completed, and in the likelihood that you will require our services again in the future.	<ul style="list-style-type: none"> • for the purposes of our legitimate interests, including: <ul style="list-style-type: none"> ◦ keeping our records up to date ◦ managing our on-going relationship with you
5.	For back-up, storage and archival purposes we use cloud based services. Therefore, for technical and organizational reasons, it is necessary that your personal data is transferred to servers located in the Canada, or to servers located in countries outside of the European Economic Area ('EEA').	<ul style="list-style-type: none"> • enter into or perform a contract to which you are a party • for the purposes of our, or a third party's, legitimate interests, including: <ul style="list-style-type: none"> ◦ the provision of administration and IT services and network security ◦ preventing fraud
4.	We process your booking, howsoever made directly via our email address or via a third party estate agent.	<ul style="list-style-type: none"> • enter into or perform a contract to which you are a party
5.	We offer and provide services you request from us via email or telephone. We use the email address you provide to deliver reports and exchange necessary communication relevant to the service(s) requested.	<ul style="list-style-type: none"> • consent, where required • enter into or perform a contract to which you are a party • for the purposes of our, or a third party's, legitimate interests
6.	We use name, address and email address for invoicing purposes.	<ul style="list-style-type: none"> • enter into or perform a contract to which you are a party
7.	We endeavour to provide a high level of security	<ul style="list-style-type: none"> • for the purposes of our, or a

	of both the information we store as well as our facilities, (IT) systems and premises, by means of encryption, physical security measures, passwords and company procedures.	third party's, legitimate interests, including: <ul style="list-style-type: none"> o maintaining appropriate physical and IT/network security
9.	We engage in activities required for compliance with legal obligations, third party claims or requests from public authorities, such as (i) the mandatory storage/containment of certain information because of a criminal investigation, (ii) requests from third parties for access to information (iii) any further instructions from third parties, such as supervisory authorities, that involve data processing.	<ul style="list-style-type: none"> • consent (if required) • enter into or perform a contract to which you are a party • for the purposes of our, or a third party's, legitimate interests • compliance with a legal obligation

4. SHARING YOUR DATA

We may share your personal data as follows:

- **Third Parties Designated by You.** We may share your personal data with third parties (agents, landlords, tenants, co-owners) where necessary by law for transparency and due diligence to all parties concerned and/or when you have provided your consent to do so.
- **Corporate Restructuring.** We may share personal data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- **Other Disclosures.** We may share personal data as we believe necessary or appropriate: (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (c) to enforce our Privacy Statement; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

We do not share your data with any third parties outside of the above processing arrangements and we do not share your data with any business external to our group for their own marketing purposes. From the data we collect, you should only ever receive communications directly related to contract work executed on your behalf.

5. INTERNATIONAL DATA TRANSFERS

In some instances it is necessary to transfer your personal data overseas. Any transfers will be made in full compliance with all aspects of the applicable regulations.

For many of our business purposes we use cloud based services. Therefore, for technical and organizational reasons, it is necessary that your personal data is transferred to servers located in Canada, or to servers located in countries outside of the EEA. We will not transfer the data to a country outside of the EEA that does not offer an adequate level of data protection.

6. YOUR RIGHTS

The GDPR provides the following rights for individuals:

Right to revoke consent

If we process personal data on the basis of your consent, you have the legal right to revoke such consent at any time. We will then cease the relevant processing activity going forward.

Right of access to your information

If you want to know what personal data we have collected or process about you, you may request us to provide a copy of your personal data by sending an email to *info@kestrelinventories.com*. We will ask you to identify yourself. We will not provide you with a copy of your personal data to the extent that the rights and freedoms of others are or may be adversely affected.

Right to rectification and erasure of data, and restriction of processing

If you believe that our processing of your personal data is incorrect, inaccurate, unlawful, excessive, incomplete, no longer relevant, or if you think that your data is stored longer than necessary, you may ask us to change or remove such personal data or restrict such processing activity, by sending an email to *info@kestrelinventories.com*.

Right to data portability

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format, in accordance with Article 20 of the General Data Protection Regulation.

Right to object

You have the legal right to object, on grounds relating to your particular personal situation, at any time to processing of your personal data. You can do this by sending an email to info@kestrelinventories.com, or (iv) writing to:

Kestrel Inventories Ltd
5 East Lane,
London SE16 4UD

For the sake of clarity: without prejudice to the foregoing we are at all times entitled to send you messages that do not constitute direct marketing, i.e. service messages.

General information relevant for all requests and queries

Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under applicable mandatory data protection law.

We will use reasonable endeavours to respond to your request or query within one month. We are entitled to extend this term by another two months if the complexity of the situation so requires. If your request is manifestly unfounded or excessive we may refuse to process your request. If we decide not to honour your request or answer your query, we will explain our reasons for doing so in our reply.

7. PROTECTION AND STORAGE OF YOUR DATA

We have used and will continue to use reasonable endeavours to protect your personal data against loss, alteration or any form of unlawful use. Where possible, your personal data will be encrypted and stored on a virtual private server that is secured by means of state of the art protection measures. A strictly limited amount of people have access to your personal data.

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.

8. COOKIES

Kestrel Inventories does not employ analytics of any description, nor does it collect information through the use of cookies and/or log information. However, the information about your use of the Kestrel Inventories website may be monitored by our web host (Webs.com) whose use of tracking technologies is subject to their own privacy policies.

9. RETENTION OF INFORMATION

We will only retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Statement. This may be up to 4 years, unless a longer retention period is required or permitted by law (which is typically the case in the context of our obligations under tax law).

10. GENERAL

We are committed to resolve any complaints about our collection or use of your personal data. In case you have any questions in relation to this Privacy Statement or our practices in relation to your personal data you may send an email to *info@kestrelinventories.com*. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority, which for the UK, is the Information Commissioner's Office.

We have done our best to make sure that this Privacy Statement explains the way in which we process your personal data, and rights you have in relation thereto. We may change this Privacy Statement from time to time to make sure it is still up to date and we will notify you if we make any material updates. We may also notify you in other ways from time to time about the processing of your personal information.