

## PRIVACY POLICY

RFM (Rent from Me) Ltd T/A Elwy ("We") are committed to protecting and respecting your privacy. We are a limited company and registered in England and Wales under company number 08010253 and have our registered office at 23 Bodfor Street, Rhyl LL18 1AS.

This policy (together with our terms of use terms and conditions and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of UK and European data protection and e-privacy legislation (Data Protection Legislation,) we are the data controller.

### Information we collect from you

We will collect and process the following data about you:

Information you give us. This is information about you that you give us by filling in forms on our site [www.elwy-estates.co.uk](http://www.elwy-estates.co.uk) (our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, search for a product, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion, or survey, and when you report a problem with our site.

The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, demographic information such as post code, preferences and interests, personal description, and photograph.

The information you give us may also include the same type of personal data that you have collected from your own customers, together with additional information about your own customers such as addresses of the properties they own, the name, address, e-mail address and phone number of tenants occupying their properties and more. By providing us with such information, you are responsible for obtaining the consent of those data subjects under the Data Protection Legislation and you warrant to us that you have fully complied with the Data Protection Legislation in relation to the information you give us.

### Information we collect about you

With regard to each of your visits to our site we will automatically collect the following information: technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number(s).

Information we receive from other sources. This is information we receive about you if you use any of the other websites we operate or the other services we provide. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

## Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Cookies are small text files that are downloaded to your device by websites you visit. These cookies help us improve our site by providing us with information about how users interact with our site such as the number of visitors to the site, the pages they visit and the length of time spent on the site. These cookies do not collect information that identifies a visitor. All the information that the cookies collect is aggregated and therefore anonymous. You may change your browser settings to delete and block cookies. To find out how visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

Before our website places cookies on your computer, you will be presented with a message bar requesting your consent to set those cookies. By giving your consent to the placing of cookies, you are enabling us to provide a better experience and service to you. You may, if you wish, deny consent to the placing of cookies; however certain features of the Website may not function fully or as intended.

Our website may place the following cookies:

### Type of Cookie Purpose

#### Strictly necessary cookies

These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

#### Analytical/performance cookies

They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

#### Functionality cookies

These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

## Targeting cookies

These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Google Display Advertising, Google Remarketing and Google Analytics

We have implemented and use Display Advertising and Google Remarketing to advertise online. You will see our Ads on Third-party vendors websites, including Google, we show our ads on sites across the Internet.

We and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimise, and serve ads based on someone's past visits to your website.

You may opt out of the DoubleClick cookie by visiting the Google advertising opt-out page or you may opt out of Google Analytics by visiting the Google Analytics opt-out page.

Google has additional information available about their Remarketing Privacy Guidelines, Policies, and Restrictions.

You can choose to enable or disable cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

By continuing to use this site without changing your settings you consent to our use of cookies as described above.

## LEGAL GROUNDS FOR COLLECTION AND USE OF PERSONAL INFORMATION

We will only collect, use and otherwise handle information held about you or received from you when:

### Information you give to us. We will use this information:

to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;

to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;

to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please inform us in writing at Elwy, 23 Bodfor Street, Rhyl LL18 1AS or by email to [mail@elwvestates.com](mailto:mail@elwvestates.com)

to notify you about changes to our service;

to provide technical support to you;

to ensure network and information security;

to ensure that content from our site is presented in the most effective manner for you and for your computer.

**Information we collect about you. We will use this information:**

to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

to improve our site to ensure that content is presented in the most effective manner for you and for your computer;

to allow you to participate in interactive features of our service, when you choose to do so; as part of our efforts to keep our site safe and secure;

to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information we receive from other sources. We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Marketing Opt-Out - you are entitled to opt-out of marketing communications at any time and free of charge by emailing [mail@elwystates.com](mailto:mail@elwystates.com) or by using the "Update communication preferences" option included at the bottom of any marketing e-mail or other marketing material received from us.

Disclosure of your information

You agree that we have the right to share your personal information with:

Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

Selected third parties including:

business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you - this may include third party integration platforms such as **Dynamic Referencing** (to facilitate tenant referencing and landlord protections) and **Tenant Shop**,

Software and System Providers including but not limited to:

**BriefYourMarket, Reapit Software, Sage, iam-Sold**

Website Hosts and analytics platform providers including but limited to:

**BriefYourMarket, Google Analytics**

or such other third-party integration platforms or plugins used in connection with the performance of any contract we enter into with them or you;

advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

analytics and search engine providers that assist us in the improvement and optimisation of our site; credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.

If Elwy or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use terms and conditions and other agreements; or to protect the rights, property, or safety of Enfys Estates, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we store your personal data

The data that we collect from you will be transferred to, and stored at, a destination within the European Economic Area ("EEA"). Your data will be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of services to you. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise the right at any time by contacting us at Elwy, 23 Bodfor Street, Rhyl LL18 1AS or [mail@elwystates.com](mailto:mail@elwystates.com)

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## Access to information

Data Protection Legislation gives you the right to access information held about you free of charge. Your right of access can be exercised in accordance with Data Protection Legislation. Any access request may be subject to a reasonable fee to meet our costs in providing you with details of the information we hold about you.

## Changes to privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## Contact us

If you would like to discuss anything in this privacy notice, please contact:

[mail@elwystates.com](mailto:mail@elwystates.com) - Data Protection Officer.