# **One&Only Privacy Policy**

One&Only Pro Limited ("One&Only", we or us) is committed to protecting and respecting your privacy.

This policy explains how we use any personal information that you provide to us through our website, app or call-centres. Please read it carefully. We may change this policy. We will post any changes on this page, so please check back frequently.

For the purposes of data protection law, the controller is One&Only Pro Limited of 100 Pall Mall, London SW1Y 5NQ.

# Information we collect from you

We may collect and process the following information about you:

#### Information you provide to us

You may provide us with information in several ways, including by filling in forms on our websites or on our apps or by corresponding with us by phone, email and live chat. This includes information you provide when you register for an account or subscribe, contact estate agents or developers using forms or phone numbers available on our websites or apps, post in our AskMe Q&A, enter a competition, promotion or survey, provide feedback or report a problem with our websites or apps.

This information may include any information you add to your profile (for example, your name, address, email address, phone number, profile picture and user name). This will also include personal information about you.

#### Information we collect about you

When you use our websites or apps, we automatically collect information about your device, including your IP address, information about your visit (including how you got to our websites) and how you use our services. We may combine this information with other information you have provided to us or which we have received from other sources.

#### Information we receive from other sources

If you use any of the other websites or services provided by the One&Only, we may receive information about you or your device in relation to that use, including your IP address, information about your visits how you use the services of One&Only. We work closely with third parties (for example, business partners, advertising networks, analytics providers and search information providers) and may receive information about you from them. This could include socio-demographic information and information about your likely interests based on your previous web browsing and purchases. We may combine this information with other information you have provided to us or which we collected about you.

### How we use your personal information

We use your personal information for the following purposes:

#### • Providing our services to you and fulfilling your requests

- o Providing you with the information, products and services you request from us.
- o Administering promotions or competitions that you enter with us.

o Allowing you to participate in our interactive features when you choose to do so.

#### Marketing and advertising

- Providing you and others with information about goods and services that we and selected third parties offer that may interest you or them, which may be based on inferences about your or their likely interests based on your activity on websites operated by One&Only or third parties.
- Customising or enhancing your experience of our services, which may use inferences about your likely interests based on your activity on websites operated by One&Only or third parties.
- Delivering relevant advertising to you on websites operated by One&Only
  Companies or third parties or in direct communications from us, which may use
  inferences about your likely interests based on your activity on websites operated by
  One&Only Companies or third parties.
- Measuring and understanding the effectiveness of advertising we serve to you and others.

#### • Service improvement and account management

- Ensuring that our content is presented in the most effective manner for you and your device.
- Administering our websites and apps and for internal business administration (for example, troubleshooting, data analysis, testing, research, statistical and survey purposes).
- o Protecting our interests and those of third parties and as part of our efforts to keep our services safe and secure.
- o Managing and operating your account with us.

## Legal basis for processing

Our legal basis for processing your personal information for the purposes described above will typically be one of the following:

#### Consent

You have consented to us using your personal information for this purpose (for example, when you create an account with us, agree to receive marketing emails from us or create an alert). You can withdraw your consent at any time by deleting the information from your account or updating your marketing preferences.

#### Legitimate interests

It is in our legitimate interests to use your personal information to operate, improve and promote our services (for example, when we customise your experience of our services or use your information for analytics purposes) and to protect our business. Sometimes, we may process your personal information when it is in the legitimate interests of another company, such as another One&Only Company.

#### **Legal obligations**

It is necessary for us to use your personal information for us or another One&Only Company to comply with a legal obligation.

# **Sharing your personal information**

We share IT infrastructure with other One&Only Companies, and so we may share your personal information with those One&Only Companies to help store your data efficiently and securely. Other One&Only Companies may access your personal information to help provide

you with services that you request from those One&Only Companies (for example, to help you manage your home) and to provide you with relevant recommendations of other One&Only services and products. These recommendations may use inferences about your interests based on your activity on our websites and apps and on other websites and apps operated by other One&Only Companies.

We may also share your personal information with third parties in the following circumstances:

#### Agents, developers and other service providers

We provide your personal information to agents, developers and other suppliers when you ask us to do so. For example, when you enquire about a property, we will pass your personal information to the agent or developer handling that property. When this happens, the agents' or developers' own privacy policies will apply to how they use your personal information. You can find these privacy policies on their websites and you should check that you are happy with them before submitting your enquiry.

# Our service providers: to help us run our business and perform services you request

We may provide your personal information to our business partners, suppliers and subcontractors who provide services to us or where necessary to perform a service that you have requested.

# Advertisers and advertising networks: to serve relevant adverts to you and others

We may provide your personal information to our partner advertisers and advertising networks that require that information to select and serve relevant adverts to you and others.

#### Analytics and search engine providers: to help us improve our services

We may provide information about your visit to analytics and search engine providers to help us improve and optimise our services. We generally only share this information in a form that does not directly identify you.

We may also share your personal information with third parties for the following reasons:

#### If we sell or buy any business or assets

If we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of that business or those assets, along with its professional advisers. If One&Only (or substantially all of its assets) is acquired, personal information held by it about its users will be one of the transferred assets.

#### To obtain professional advice

We may disclose your personal information to obtain professional advice (for example, from lawyers or financial advisors).

#### To comply with a legal obligation

We may disclose your personal information if required to do so by law or in response to a request from law enforcement or another regulatory authority. We may disclose your personal information to enforce our agreements with you or to protect the rights, property or safety of One&Only, its users or others. This includes sharing personal information with other organisations for fraud prevention purposes.

## Storing your personal information

We may transfer, store or process your personal information outside of the European Economic Area ("**EEA**"). The laws in some countries may not provide as much legal protection for your personal information as in the EEA.

By submitting your personal information, you agree to this transfer, storing or processing. Where we use service providers outside the EEA, we rely on approved data transfer mechanisms (for example, the EU Standard Contractual Clauses and the EU-US Privacy Shield) to ensure that your personal information is adequately safeguarded in the recipient country.

Where you have a password to enable you to access some parts of our websites or apps, you are responsible for keeping that password confidential. You must not share your password with anyone.

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

We keep your personal information for as long as is necessary for the purposes for which it is processed. These periods vary depending on the nature of the information and your interactions with us. If you would like to delete your MyOne&Only account, please contact us using the details below.

#### **Cookies**

We use cookies and other similar technologies to distinguish you from other users of our websites and apps (including when you browse third party websites). This helps us to provide you with a good experience when you use our services (for example, to remember your login details and improve our services). We also use cookies and similar technologies to show you more personalised advertising, including One&Only ads on other websites. You may adjust the settings on your browser to refuse cookies but some of our services may not work if you do so. For detailed information on the cookies we use and why we use them, please read our Cookie Policy.

# Opting Out of Collection of Information by Third Parties

Our third party advertisers and advertising network providers ("Ad Providers") may provide you with ads on our websites and apps or on other websites. To make those ads more relevant and help measure their effectiveness, the Ad Providers may use cookies and similar technologies. They record your activity (including pages visited) and estimate what information interests you most. They use this information in accordance with their own privacy policies. For a link to each of those policies and for information about how to opt out, please read our Cookie Policy.

# Your rights

You have the right to ask us not to process your personal information for marketing purposes. You can do this at any time by updating your email preferences in your MyOne&Only account or by clicking on the "unsubscribe" link in any marketing email we send you.

Data protection law gives you the right to access your personal information, to object to the use of your personal information for certain purposes, and the right to erase, restrict or receive a machine-readable copy of your personal information. You can access, update and delete your One&Only account information by logging into your MyOne&Only account. If you cannot fulfil your request using these tools, please email <a href="mailto:privacy@oneandonlypro.com">privacy@oneandonlypro.com</a> or contact us using the address below.

We will handle your request in accordance with the law. This means there may be legal reasons why we cannot fulfil all requests.

# Links to third party websites

Our websites and apps may contain links to other websites. This privacy policy does not apply to those other websites and we do not accept liability for the content of any other website. Please check the privacy policy of any other website before submitting any personal information to it.

#### Contact us

If you have questions about this privacy policy or the way in which One&Only processes your personal information, you can contact us using the details below:

Post:Data Protection Manager, One&Only Pro Limited, 100 Pall Mall, London SW1Y 5NO

Email: privacy@oneandonlypro.com

We hope that we will be able to resolve any questions or concerns you have. However, you may at any time raise your concern with the <u>UK Information Commissioner</u> at:

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Last updated: 17 August 2018