



Combatfix T/A  
RedRing Property Services  
1 Flaxman Road  
SE5 9DL

## Data Handling and Privacy Policy

This data handling and privacy policy sets out how RedRing Property Services uses and protects any information that you give RedRing Property Services when you use their services. RedRing Property Services is committed to ensuring that your personal data and digital privacy is protected. Rest assured that all information gathered will only be used in accordance with this privacy statement, and that we will work hard to ensure that we follow the GDPR's six main principles:

- Data is processed lawfully, fairly and in a transparent manner
- Data is collected for specific, explicit and legitimate purposes
- Data is adequate, relevant and limited to what is needed
- Data is accurate and where necessary kept up to date
- Data is retained only as long as necessary (subject to other legal requirements)
- Data is processed in an appropriate manner to maintain security

RedRing Property Services may change this policy from time to time by updating this document. This policy is effective from 24/05/2018.

### **Purpose of this privacy notice**

This privacy notice aims to give you information on how RedRing Property Services collects and processes your personal data through (i) your use of our website, including any data you may provide through the website, for example, when you submit your details to us through the contact form; and (ii) when we collect and process your personal data other than through this website as a consumer, customer, supplier or other business contact or as a potential consumer, customer or supplier. Our services are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **What data do we collect?**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer ("process") different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title.
- **Contact Data** includes email address, home address, billing address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes your personal or professional interests, preferences, feedback and survey responses, purchase history; data which we may obtain from you to enable us to undertake credit or other financial reference checks on you and online data obtained from accounts which you may link to us e.g. Facebook, or relating to your professional online presence e.g. LinkedIn.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this 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). Nor do we collect any information about criminal convictions and offences.

#### How do we collect your personal data?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - submit a comment or query through our website; subscribe to our service or publications; request marketing to be sent to you; enter a survey; or give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our [cookie policy](#) for further details. We may also collect Profile Data through our communications systems and email.
- **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: analytics providers; advertising networks; and search information providers.
  - Contact Data from our clients instructing us to carry out services on their behalf and consequently act as data processors.
  - Data relating to your payment details from a third party such as your bank or building society, with your knowledge and approval.

- Identity and Contact Data from data brokers or aggregators.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- Identity and Contact Data from sanctions screening providers, credit reference agencies and customer due diligence providers.

### **What do we do with the information we gather?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- with your consent;
- where we need to perform a contract with you e.g. when you purchase goods from 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; or
- where we need to comply with a legal or regulatory obligation.
- Internal record keeping
- To carry out our services professionally and effectively
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.

Whenever we process data for these purposes we will ensure that we always keep your personal rights and privacy in high regards.

We may pass your information to our third-party service providers such as courier companies, suppliers, sub-contractors, payment providers for the purposes of completing tasks and providing services to you on our behalf.

RedRing Property Services will not share your information for marketing purposes with any third-party company.

### **Direct Marketing Communications**

We may use your personal data to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in processing your personal data for direct marketing purposes. This means that we usually do not need your consent to send your promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will get your express opt-in consent before we share your personal data with any company outside of RedRing Property Services for direct marketing purposes.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations. We may ask you to confirm or update your direct marketing preferences if you instruct us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

### **International transfers**

We do not transfer your personal data outside the European Economic Area.

### **Data retention - How long will you use my personal data for?**

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.

You can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

### **Your rights regarding your personal data;**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You may choose to restrict the collection or use of your personal information at any time in the following ways:

- whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes
- if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at [info@redringwebsite.com](mailto:info@redringwebsite.com).
- You may request details of personal information which we hold about you. If you would like a copy of the information held on you please write to [info@redringwebsite.com](mailto:info@redringwebsite.com). 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.
- If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

### **How to contact us regarding your personal data?**

Please contact us if you have any questions about our privacy policy or information we hold about you. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. Please contact us using the details below if any information is found to be incorrect and we shall rectify immediately.

Company name: Combatfix Ltd. T/A RedRing Property Services

Our Data Protection Officer is Shyam Prajapati

ICO Registration Reference: ZA370536

Telephone: 02077354889

Company Address: 1 Flaxman Road, London, SE5 9DL

Email: [redring@email.com](mailto:redring@email.com)

### **Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online and offline.

### **How we use cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and to improve targeted marketing, and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer, but this may prevent you from taking full advantage of the website.

### **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Changes to our Privacy Policy**

We keep our privacy policy under regular review. This privacy policy was last updated 24<sup>th</sup> May 2018.