

## **Privacy Notice**

Welcome to our privacy notice for [www.hoozzi.com](http://www.hoozzi.com)

CLASSIC FOLIOS LIMITED (**we**) are committed to protecting and respecting your privacy. We will only collect and use personal data in the ways that are described here.

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

This privacy notice will inform you as to how we look after your personal data when you visit our website, <http://www.hoozzi.com> (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This website is not intended for children and we do not knowingly collect data relating to children.

This notice (together with our [terms of use](#) and any other documents referred to it) sets out what personal data we collect from you, or that you provide to us, and how we will use your personal data. It also describes how you can access, update or otherwise take control of your personal data that we process.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.hoozzi.com](http://www.hoozzi.com), you are accepting and consenting to the practices described in this policy.

If we make changes to this notice, we will notify you by updating it on our website.

Classic Folios is the controller and is responsible for your personal data, collectively referred to as, "we", "us" or "our" in this privacy notice.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### **Contact details**

Our full details are:

Full name of legal entity: Classic Folios

Name or title of DPO: Data Protection Officer

Email address: [Hello@hoozzi.com](mailto:Hello@hoozzi.com)

Postal address:

Woodside Trade Centre, 34 Parham Drive, Eastleigh, Hampshire, SO50 4NU

Telephone number: 023 8062 6280

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

### **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on 10<sup>th</sup> May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 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.

## 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 [www.hoozzi.com](http://www.hoozzi.com) (our site) or by corresponding with us by phone, email 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, email address and phone number, financial and credit card information, personal description and photograph.
- **Information we collect about you.** With regard to each of your visits to our site, we will automatically collect the following information:
  - Internet Protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, location, 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.
- **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. In this case, we will have informed you when we collected that data if we intend to share that data internally and combine it with data collected on this site and also for what purpose we will share and combine your data. Where data is provided to us by the developer from whom you bought your home, we will seek to inform you about how we intend to use the data as soon as you sign up to receive the Hoozzi service (for which the developer has paid on your behalf). We are working closely

with third parties (including, for example, business partners such as the developer from whom you bought your home, 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. For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy [www.hoozzi.com/cookie\\_policy](http://www.hoozzi.com/cookie_policy)

## **How do we use your information?**

We use information held about you in the following ways:

- All personal information is processed and stored securely, for no longer than is necessary in light of the reason(s) that it was first collected.
- Our use of personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you or because you have consented to our use of your personal data, including:
  - 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 (email 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 tick the relevant box situated on the form on which we collect your data. You can also update your

information at any time through your preference centre in '**My account**' > '**Update preferences**'.

- To notify you about changes to our service.
- To ensure that content from our site is presented in the most effective manner for you and for your device.
- **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 device.
  - 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).

## **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:
  - The developer from whom you bought your home, which has resulted in you receiving the Hoozzi service.
  - Business partners, suppliers and sub-contractors for 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.
- Marketing companies who help us manage our electronic communications or carry out surveys on our behalf.

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 CLASSIC FOLIOS LIMITED 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, [www.hoozzi.com/Hoozzi terms of use](http://www.hoozzi.com/Hoozzi_terms_of_use), and other agreements; or to protect the rights, property, or safety of CLASSIC FOLIOS LIMITED, 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**

Although your data is held in the European Economic Area (EEA) on the Amazon Web Services platform (AWS), some of the information that you provide to us may be transferred outside the European Economic Area (EEA), for example to process email communications. 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 and the GDPR.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL (secure sockets layer) technology. SSL certificates create secure connections, meaning you can feel confident when making payment transactions with us.

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.

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.

## **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.

## **Your rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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 your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [hello@Hoozzi.com](mailto:hello@Hoozzi.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**

The GDPR gives you the right to access information held about you. Your right of access can be exercised in accordance with the GDPR. Please contact [hello@hoozzi.com](mailto:hello@hoozzi.com)

### **No fee usually required**

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.

### **What we may need from you**

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.

### **Time limit to respond**

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.

### **Changes to our privacy notice**

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

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [hello@hoozzi.com](mailto:hello@hoozzi.com)