

Privacy Notice

Last updated: 24th May 2019

1. Introduction

This Privacy Notice sets out how Ask Products Ltd ("AskPorter", "we", "us", "our"), whose registered office is at Arquen House, 4-6 Spicer Street, St. Albans, Hertfordshire, England, AL3 4PQ, collects, shares and uses personal information about you and how you can exercise your privacy rights. This Notice applies to personal information that we are the controller of in the following circumstances:

- you use the online property management platform askporter.com and/or the application ("Service");
- you visit our website;
- when we process your personal data for marketing.

In some circumstances we will be acting as a processor. This is when we are acting for estate agents who use Ask Porter to provide services to their tenants and landlords. In this circumstance you should refer to the privacy policy of the relevant estate agent.

2. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

3. Contacting us

If you have any queries or concerns in relation to this Privacy Notice or the Service, please contact us using the following details:

For any privacy enquiries please contact our team via email at privacy@AskPorter.com

For general enquiries please contact our support team via email at support@AskPorter.com

4. What personal information we collect, how we use it and why we use it

The personal information that we may collect about you broadly falls into the following categories:

- Information you provide as part of the Service

You may be asked to provide voluntarily personal information about yourself when you use our Service. As a user of our Service, you may wish to create an account ("Account") with us. The personal information that you may provide when setting up your Account may include your name, email address, postal address, bank account details, and telephone number. You may also provide us with your credit or debit card number, security code and expiry date, when using our Service. Furthermore, you may provide us with personal information in your correspondence with us and in the content you upload through the Service. If you register to hold an Account with us, you will also have a unique identifier and password which enables you to access your Account.

We will use the personal information you provide us because we have a legitimate interest in processing that personal information. The personal information enables us:

- (1) to facilitate the contract between the managing agent and the relevant tenant /landlord as appropriate;
- (2) to provide you with services you have purchased from us, where appropriate;
- (3) to process debit and credit card payments;
- (4) to verify your identity;
- (5) to prevent, detect and investigate potentially illegal activities;
- (6) to send you information about the Service; and
- (7) to provide customer service in relation to your use of the Service, to contact you, to deal with enquiries and complaints relating to the use of the Service and to notify you of any changes to the Service.

- Information we collect automatically

When you visit our website, we may automatically collect information from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, log-in information, broad geographical location (e.g. country or city-level location), browser type and version, browser plug-in types and versions, operating system and platform, information about your visit including the URL clickstream to, through and from our website, download errors, length of visits to certain pages, page interaction, referral source and similar information. This information may be collected by a third party website analytics service provider on our behalf and may be collected using cookies. For more information on our use of cookies please refer to the "Cookies and similar tracking technologies" section below, please find our cookie notice here: <https://www.askporter.com/ask-products-ltd-cookie-policy/>.

We use the information for our legitimate interests to operate our platform. Specifically, we collect information automatically for the following reasons:

- (1) to administer our website for internal operations including troubleshooting purposes;
- (2) as part of our effort to keep our website safe and secure;
- (3) to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

- (4) to develop, improve and personalise the Service so as to improve your experience;
and
- (5) to provide third parties with anonymised statistical information about our users.

- Information we collect from others

If you are the employee of an estate agent or property management company then they may provide your name and contact details to use to enable us to provide a Service to the agent. We have a legitimate interest in processing this personal information to enable us to provide the Service, for example to direct liaise with you regarding service issues and queries.

- For direct marketing

When you create an account with us we will ask you whether you want to be added to our marketing list. We will collect your name and contact details to enable us to send marketing to you. If you choose 'yes' we will add you to our marketing list. In this instance we process your personal information because we have your consent to do so.

- Replying to enquiries

If you send an enquiry to us via our website then we will ask for your name and contact details to enable us to respond to you. We have a legitimate interest in processing your name and contact details to enable us to respond to your enquiry. If you do not provide contact details we will not be able to respond to your request.

5. Sharing and disclosing your personal information

Other than as expressly set out in this Privacy Notice or as otherwise required or permitted by law, we will not share, sell or distribute any of your personal information without your consent.

7. Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, "Cookies") to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice here: <https://www.askporter.com/ask-products-ltd-cookie-policy/>.

8. Security

We employ appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Data transmission over the internet is inherently insecure, and although we employ appropriate technical and organisational security measures to protect your personal

information from unauthorised access we cannot guarantee the security of any personal information sent over the internet.

You are responsible for keeping your password and user details confidential. Nobody at AskPorter will ever ask you for your password, be careful not to share this with anyone.

9. Data retention

We will retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal tax or accounting obligations).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

10. International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

Our servers are situated in Dublin, Ireland; however we may also transfer your personal information to the following which are located outside the European Economic Area (EEA) as follows:

- The USA in order to provide you with phone and sms communications, to process payments, to provide an authorisation service for the Site and for hosting services.
- Ukraine as this is where some of our development work takes place.

However, we have taken appropriate safeguards, such as the EU-US Privacy Shield and EU model clauses, to ensure that your personal information will remain protected in accordance with this Privacy Notice.

To obtain a copy of the safeguards in place please contact the privacy team via email at privacy@AskPorter.com

11. Your data protection rights

You have the following data protection rights:

- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations

- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

You have the right to opt-out of marketing communications we send you at any time by following any “unsubscribe” link included in the marketing emails which we send to you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “Contact” heading above or by contacting privacy@AskPorter.com.

Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time.

You can exercise your rights at any time by contacting us using the contact information provided under the "Contact" heading above or by contacting privacy@AskPorter.com. We may also require you to provide us with appropriate identification before we comply with this request.

You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. In the United Kingdom that would be the Information Commissioner’s Office (ICO) and details of how to contact the ICO can be found here: <https://ico.org.uk/global/contact-us/>.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. When you make a request we will ask you for proof of identity to enable us to respond to your request.

12. Third-party websites

Our website may contain links to other websites belonging to or operated by third parties. By making these links available, we are not endorsing third-party websites, their content, products, services or the owners of these third-party websites. It is your responsibility to make sure that you obtain any information which may be relevant to making a decision, and that you read the privacy and security policy on such third-party websites.