

## Privacy Notice

### LSLi Limited is committed to protecting your privacy

---

#### Introduction

In this Privacy Notice the terms, 'we', 'us' and 'our' are references to LSLi Limited (LSLi), company number 06029502, having a registered address of Newcastle House, Albany Court, Newcastle Business Park, Newcastle upon Tyne NE4 7YB. LSLi is part of the LSL group of companies of which the ultimate parent company is LSL Property Services plc (LSL Group).

This Privacy Notice sets out the basis on which any personal data we collect from you through our website <http://www.jnp.co.uk/> (Our Sites) or that you provide to us through Our Sites, our franchisees or via other methods you may communicate with us, will be processed by us. [Click here](#) for a full list of Our Sites

We franchise our brands to estate agents who are independently owned and operated by parties that have entered into a franchise agreement with us. They will also collect and use your personal data. Each of these estate agents is the data controller for their franchise business and are responsible for the processing of your personal data. You can find their privacy notices [here](#)

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it, including:

- What information is being collected from you?
- When will Special Data and Criminal Disclosures be collected?
- How do we use the information we collect?
- The legal basis upon which we deal with your information
- What is the source of the information we collect?
- How long do we retain your information?
- Who do we disclose your information to
- What marketing activity do we undertake?
- Third party websites
- How do we keep your information secure?
- How do we use Cookies?
- What are your rights?
- How do you contact us about your data

Your privacy is important to us, and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws.

By accessing, browsing or otherwise using Our Sites you confirm that you have read and agree to this Privacy Notice. If you do not agree with any part of this Privacy Notice, you should not use Our Sites or use our services.

We reserve the right to change the contents of Our Sites, including this Privacy Notice at any time, by posting such changes on Our Sites. It is your responsibility to familiarise yourself with the Privacy Notice regularly to ensure that you are aware of any changes. Your continued use of Our Sites following the posting of any such changes will constitute your acceptance of the revised Privacy Notice.

This Privacy Notice was last updated on 3 May 2023. Please contact us using the details below should you require any clarification regarding how we may have processed your data prior to this date.

## What information is being collected from you?

We may collect personal information from you in connection with your use of Our Sites, including such personal information as:

Category	Examples	When we collect
<b>Personal contact information</b>	Name Address Email Phone numbers	When you register an account on our website or use an online form to arrange a viewing, register for property alerts, request a valuation or lettings consultation, book a mortgage appointment or submit an enquiry
<b>Personal identifiers</b>	Marital status Date of birth Nationality Tax status	When you enter into a residential sales or lettings agreement with our franchisees
<b>Property information</b>	Address Property description Floor plans Energy performance certificate ratings Property photographs	When you ask our franchisees to market a property to sell or let on your behalf
<b>Financial information</b>	Bank account details Tax URN number	Where we manage a financial transaction for you, set up a standing order, or take payment for the services which we or our franchisees provide to you
<b>Browser data</b>	The time, date and duration of your visit to our website the sites from which you have come (the referral URL) the pages visited your IP address.	When you visit our website
<b>Special Category Information</b>	Health information Appropriate adjustments	When you volunteer this information to us

## When will Special Data and Criminal Disclosures be collected?

We may have collected personal information from you which is of a sensitive nature. Where we have done so we treat this information in accordance with the additional protection it is given under data protection laws.

## How do we use the information we collect?

Your information will be used by us in connection with the following purposes:

Data	Usage
<b>Estate agency services</b>	<ul style="list-style-type: none"> <li>Helping you to sell your property, or to find a property to purchase</li> <li>Referring you to our conveyancing services</li> <li>Referring you to our mortgage and insurance partners (Embrace Financial Services Limited and First2Protect Limited)</li> <li>Progressing any mortgage and/or insurance transaction you may have commenced using our services</li> <li>Referring you to e.surv Limited if you would like a home survey or property valuation report</li> </ul>
<b>Lettings services</b>	<ul style="list-style-type: none"> <li>Helping you let your property, or to find a property to rent</li> </ul>

	<ul style="list-style-type: none"> <li>To process the receipt and payment of rent, maintenance and tax</li> <li>To protect a tenant's deposit by registering it with a deposit protection scheme</li> </ul>
<b>Marketing our services to you</b>	<ul style="list-style-type: none"> <li>To provide you with general updates in relation to the property market</li> <li>To provide you with information or services believed to be relevant to you, including conveyancing and financial services products</li> <li>To carry out targeted advertising to you on social media websites when you have already shown an interest in our services</li> </ul>
<b>Responding to your queries</b>	<ul style="list-style-type: none"> <li>To help answer any questions which you have asked one of our agents or staff members</li> <li>To provide you with a quote for our services</li> </ul>
<b>Improving our services</b>	<ul style="list-style-type: none"> <li>To analyse cookie and website usage data to improve our website;</li> <li>To allow us to customise the content which is presented to you based on your likely interests</li> <li>To keep client records up to date</li> </ul>
<b>Legal and Regulatory Obligations</b>	<ul style="list-style-type: none"> <li>To comply with applicable laws where we are obliged to retain and/or disclose certain information</li> <li>To investigate or address claims or complaints relating to your use of our services</li> <li>For internal and external auditing purposes</li> </ul>
<b>Other</b>	<ul style="list-style-type: none"> <li>To take a payment for the services we provide</li> <li>To collect a debt which is owed to us or our franchisees</li> </ul>

## The legal basis upon which we deal with your information

Wherever we collect or use your personal information, we will make sure we do this for a valid legal reason. This will be for at least one of the following purposes:

- *because it is necessary to fulfil the terms of our contract with you* - if you have entered into a contract with us for example to sell a property or provide advisory services for a financial product;
- *because it is necessary to support the legitimate interests of our business in operating Our Sites and providing estate agency services in relation to our franchisees efficiently to meet your needs* - in all such cases, we will look after your information at all times in a way that is proportionate and respects your privacy rights and you have a right to object to processing as explained in the section on Your Rights below;
- *to meet responsibilities we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities*
- *where we have obtained a clear consent from you* - we will always make it clear when we need your consent and how you can change your permissions at any time thereafter.

If you would like to know more about the legal reasons or legitimate interests that apply to a particular way in which we use personal information you can contact us at any time. If you would like to know more about the

legal reasons or legitimate interests that apply to a particular way in which our franchisees use your personal information you should refer to their privacy notice or contact them directly.

### What is the source of the information we collect?

The majority of the personal information which we collect will have been voluntarily provided by you, however we may also obtain your personal data from other sources including:

- other LSL Group companies;
- our franchisees;
- third parties including credit reference agencies, law enforcement/regulatory bodies, companies providing commercially available databases, social networks (such as Facebook), introducer companies who have referred you to us for the delivery of services, your employer, your solicitor, trustees or your attorney;
- online property portals such as Rightmove and Zoopla; and
- other publicly available sources such as the electoral roll and HM Land Registry.

### How long do we retain your information?

The personal information that you provide will be retained by us in accordance with applicable laws and our internal Retention Policy. However, we will take reasonable steps to destroy or de-identify personal information we hold if it is no longer needed for the purposes set out above. We will only hold your personal information on our systems for as long as is necessary for the relevant purpose for which it was collected. A copy of our Retention Policy is available on request.

### Who do we disclose your information to?

The information you provide to us will be recorded and stored on our computer systems and accessed by or given to our staff or to any member of the LSL Group or our franchisees for the purposes set out in this Privacy Notice or for other purposes approved by you. We may also provide your personal information to other companies within the LSL Group and our franchisees for the purposes of administering our business or where services are provided by one LSL Group company to another pursuant to an intra-company services agreement or across franchisees under our franchise agreements.

We will also disclose your information to the following third parties when required for the following purposes:

Who	Why
<b>Insurance Services (administered by First2Protect Limited)</b>	<ul style="list-style-type: none"> <li>• To seek your consent to discuss your insurance requirements</li> </ul>
<b>Mortgage and Protection Services (Embrace Financial Services Limited)</b>	<ul style="list-style-type: none"> <li>• When you agree for us to refer you to discuss your mortgage and protection requirements</li> </ul>
<b>Landlords, tenants and guarantor</b>	<ul style="list-style-type: none"> <li>• To comply with our legal obligations</li> <li>• To keep all parties fully informed where our franchisees manage a property on behalf of a landlord</li> </ul>
<b>Surveyors</b>	<ul style="list-style-type: none"> <li>• If you or your mortgage provider require a homebuyers or structural survey to be carried out</li> </ul>
<b>Law enforcement bodies and/or other regulatory entities</b>	<ul style="list-style-type: none"> <li>• In order to comply with any legal obligation or court order including the police, HMRC and local authorities</li> </ul>
<b>Debt collection agencies</b>	<ul style="list-style-type: none"> <li>• To assist us in collecting any monies which you owe to us or our franchisees where payment is overdue</li> </ul>

Who	Why
Digital marketing solutions communications	<ul style="list-style-type: none"> <li>To support us in performing marketing campaigns</li> </ul>
Website hosting companies	<ul style="list-style-type: none"> <li>To manage website hosting and provision of online accounts</li> </ul>
eSignature services	<ul style="list-style-type: none"> <li>To facilitate electronic signature of documents</li> </ul>
Professional advisers	<ul style="list-style-type: none"> <li>For the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations</li> </ul>
Third party payment processors	<ul style="list-style-type: none"> <li>To facilitate any payments we collect from you in a secure manner</li> </ul>
Third parties	<ul style="list-style-type: none"> <li>In the event of a claim or dispute relating to the use of our services</li> </ul>
Deposit protection service	<ul style="list-style-type: none"> <li>For the purpose of providing a tenancy deposit protection scheme</li> </ul>
The Property Ombudsman	<ul style="list-style-type: none"> <li>Where they are providing an alternative dispute resolution service in connection with the letting services which we are providing</li> </ul>
Propertymark	<ul style="list-style-type: none"> <li>A professional body responsible for raising professional standards amongst letting agents, where information relating to you is requested by them in order to protect your interests</li> </ul>

## What marketing activity do we undertake

We and our franchisees use the information you provide us with to keep you informed about products or services which we and our franchisees provide and which we believe you may be interested in. Where we conduct marketing we do so in accordance with applicable laws.

Where you contact us through the 'contact' page of Our Sites, or make an enquiry in branch or on the phone to one of our franchisees, we and our franchisees will use the details you have supplied to us to provide you with our general property marketing by email unless you choose to 'opt-out' of these communications.

If you do 'opt-out' then we will not send you information relating to our general property marketing by email. We may however contact you in future by phone where we reasonably believe (on the basis of services that we are providing to you) that there are additional, different services which you may be interested in. This may be, for example to offer you mortgage and protection services when we are assisting you with your search for a property, or to offer you property insurance services at the point at which you have exchanged contracts for the purchase of a house or agreed a tenancy, or to offer you conveyancing services. We rely on legitimate interests as a lawful basis for processing your information to conduct this above marketing and we ensure you always have the right to opt-out of receiving marketing communications from us. If you wish to never receive any form of marketing communication from us you can let us know by contacting us (using the details provided below).

If, at any time, you prefer not to receive further communications from us or our franchisees (except in connection with information, products or services that you specifically request), you will have the ability to unsubscribe from such communications by means of a link provided in every marketing message that is sent to you by us or by contacting us.

We will receive anonymous statistical information about our marketing. You will not be identifiable from this.

## **Third party websites**

Our Sites may contain links to other websites. We accept no responsibility or liability for the content of other websites which are not under our strict control, in particular, we are not responsible for the protection and privacy of any information which you provide whilst visiting other websites and such sites are not governed by our Privacy Notice.

## **How do we keep your information secure?**

We employ security measures which aim to protect the information provided by you from access by unauthorised persons and against unlawful processing, accidental loss, destruction or damage.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is sent to us.

Third parties service providers who process your personal data on our behalf may be located in the UK or elsewhere in the world where different privacy laws may apply which may not offer the same level of protection as UK law. We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect any information held in that country and that the service provider acts at all times in compliance with applicable privacy laws.

## **How do we use Cookies?**

Our Sites use cookies (including cookies to obtain an overall view of visitor habits and visitor volumes to Our Sites). To view more information on what cookies we use and how we use them please review our separate Cookies Policy

## **What are your rights?**

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information.

### **Right to access personal information**

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of; (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred.

### **Right to rectify or erase personal information**

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in the following limited circumstances:

- where it is no longer needed for the purposes for which it was collected; or
- where you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see right to object); or
- where it has been processed unlawfully; or
- to comply with a legal obligation to which we are subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

### **Right to restrict the processing of your personal information**

You can ask us to restrict the processing of your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but you still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

### **Right to transfer your personal information**

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

### **Right to object to the processing of your personal information**

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

### **Right to object to how we use your personal information for direct marketing purposes**

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

### **Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction**

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

### **Right to lodge a complaint with your local supervisory authority**

You have a right to lodge a complaint with your local supervisory authority (the contact details for which are set out in the Complaints section of this Privacy Notice) if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

If you wish to access any of the above rights, we may ask you for additional information to confirm your identity and for security purposes before disclosing personal information to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us using the details in the Contact section of this Privacy Notice. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

## How to contact us

If your query relates to use of your personal information by our franchisees, you can find their details in their own Privacy Notice which can be found [here](#).

If you have questions or comments about our Privacy Notice or if you wish to exercise your rights mentioned above, please contact our Data Protection Officer by:

Email: [dataprotection@lslps.co.uk](mailto:dataprotection@lslps.co.uk);

Post: Data Protection Officer, Newcastle House, Albany Court, Newcastle Business Park, NE4 7YB; or

Telephone: 0191 233 4600.

If you have any concerns or complaints as to how we have handled your personal data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## LSLi Franchisees

Our franchisees include:

- AIG (HALO) Ltd trading as Frost's
- AIG (AL) Ltd trading as Intercounty
- AIG (KH) Ltd trading as JNP
- AIG (SLB) Ltd trading as Thomas Morris