



PRIVACY POLICY

0115 920 2222
www.execulets.co.uk

Execulets Ltd takes your privacy very seriously. We ask that you read this Privacy Policy carefully as it contains important information about what to expect when we collect personal information about you and how we will use your personal data. In this document “we” and “us” refers to Execulets Ltd.

How we use your personal information

This privacy policy is to let you know how we look after your personal information. This applies to visitors to our website and people who do business with us or register to receive information about us and/or the products and services we provide.

This includes what you tell us about yourself, what we learn by having you as a client, and the choices you give us about what information you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you. Occasionally we may also receive information about you from other sources (such as credit reference agencies) which we will add to the information which we already hold about you in order to help us provide our services, deal with your inquiries and requests and administer contracts.

Owner and Data controller: Execulets Ltd, 2b Thackerays Lane, Woodthorpe, Nottingham, NG5 4HP. Tel. 0115 9202222 or email the data controller bonnie@execulets.co.uk. ICO Registration Number ZA085530.

How the law protects you

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works. Data Protection law says that we are allowed to use personal information only if we have a lawful reason to do so. This includes sharing it outside Execulets Ltd.

The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information.

- To manage our relationship with you our client
- Assessing applications for and providing Execulets services
- Conducting business, developing relationships with Execulets and any person or organisation connected with us
- Processing payments and transactions including; accounting, authorisation, auditing, billing, reconciliation, collection, complaints, enquiries, credit check and related dispute resolution activities.
- To provide information to a third party organisation for their records such as Council Tax or Utilities
Protect against and prevent fraud, unauthorised transactions, money laundering, tax evasion, claims, other liabilities and manage risk exposure, compliance and security of business processes.
- Provide, administer and communicate with you about our services, offers, promotions.

- Operate, monitor, evaluate and improve our services, websites and other digital assets and business.
- Developing and managing existing and new services.
- Managing communications, assess effectiveness and optimisation of advertising
- Comply with industry standards, legislative requirements and Execulets policies.

Anti-Money Laundering

In addition to help you with a property related service we have to comply with certain regulations like the money laundering, terrorist financing and transfer of funds Regulations 2017.

Execulets Ltd are required to obtain certain information from you to comply with these regulations. The information provided will only be used by us in relation to comply with these regulations and will not be shared with any other party outside of the company wholly owned by us unless we are required to do so under law.

Groups of Personal Information

We use many different kinds of personal information, and group them together like this.

Type of Personal Information	
Contact	Where you live and how to contact you, your email address, phone number, postal address and your preferred method of contact
Socio-Demographic	This includes details about your work or profession and nationality
Contractual	Details about the products or services we provide to you
Communications	What you provide within your letters, emails and conversations with us
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include ID documents such as your passport, drivers licence or birth certificate
Special types of data	Legislation treats some types of personal information as special. We will only collect and use these types of data if the law allows us to do so: Religious or philosophical beliefs Racial or ethnic origin Health data including gender Criminal convictions and offences
Consents	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you
National Identifier	A number or code given to you by the government to identify who you are, for example your National Insurance number

Lawful basis of processing

We process your information under the following:

- Performance of a contract: where you enter into a contract whether with or through Execulets and we need to process your information as part of this contract.
- Legitimate interest: some information is processed by Execulets as part of its legitimate interest which includes: Fraud, risk assessment, due diligence, network and information security, suppressions and managing opting out of communications, profiling, direct marketing, monitoring acquisitions, updating customer details, lettings, financial services and other core products and services provided by us.
- Public interest: some information is processed in accordance with public interest such as relocations.
- Consent: where we process information under consent we will seek your clear and unambiguous consent prior to processing your data.

Information we share

We do not sell or otherwise disclose personal information we collect about you, except as described in this privacy notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- Vetted affiliates and partners / financial institutions / insurance companies for business facilitation to provide required services such as, insurance cover etc
- Formally contacted service providers to perform services on our behalf
- Helpdesk, call centres, answer phone services etc

We contractually require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements.

- Councils and health care providers
- Law firms
- Credit agencies, Land Registry office, Her Majesty's Revenue and Customs, Financial Conduct Authority, and other relevant regulatory bodies.
- Additionally, we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities.

On websites, features can be accessed where we partner with other entities that are not affiliated with Execulets. These include social networking, geo-location tools etc, are operated by third parties who may use or share information in accordance with their own privacy policies. It is recommended that you review the third party's privacy policies if you use the relevant features.

Execulets reserves the right to transfer your information in the event of a sale or transfer (wholly or partly) of our business or assets, with reasonable efforts for the acquirer to protect / use your information consistent with our Global Privacy notice. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.



How long do we keep information for?

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep information for as long as necessary. We generally keep personal information for 7 years after last contact with you. However, Execulets reserves the right to keep information for longer if we feel that this is in the legitimate interests of Execulets.

International data transfers

Execulets may transfer the personal information collected about you to recipients in countries other than the country in which the data was collected. Those countries may not have the same data protection laws as ours. When we transfer information to other countries, we will protect that information as described in this privacy notice or as otherwise disclosed to you at the time the data is collected.

Direct Profiling

Direct profiling is engaged for the fair and lawful purposes, to provide Execulets with the ability to enforce Execulets “terms of use”, legally reporting as may be required by applicable laws, regulations, policies / standards or requested by any judicial process or governmental agency having or claiming jurisdiction over Execulets or its affiliates: including, but not limited to:

- Background checks for existing and new employees, clients, business partners, affiliates
- Financial viability analysis / reports
- Anti-money laundering
- Tax reporting
- Credit defaulting / exposure

Indirect profiling

Indirect profiling via anonymisation of personal information is also used for preparing and furnishing aggregated data reports showing anonymised information, including but not limited to:

- Compilations, analyses, analytical and predictive models and rules, and other aggregated reports for the purpose of advising our partners / affiliates and servicing institutions, retailers and other customers regarding past and potential future patterns of service usage, spending fraud, and other insights that may be extracted from this data.
- Compiling and communicating promotional and marketing information about products and services that Execulets, affiliates and other organisations that we have affiliations with have and that may be of interest to you.
- Conducting market research
- Facilitating out internal business operations, including the fulfilment of any legal requirements.

Your rights and choices

Your rights regarding the sensitive/personal information maintain about you, enable you to exercise choices about what personal information we collect from you, how we use that information and how we communicate with you.

Access and correction

You may have the right to:

- Obtain confirmation that we hold personal information about you
- Request access to and receive information about the personal information we have about you
- Receive copies of the information that we maintain about you

The right to access personal information may be limited in some circumstances by local law requirements.

To exercise these rights, please contact us as below.

Update and correct inaccuracies in your personal information

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate.

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide these reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to information we hold about you.

Object to processing of your personal information

If you would like to object to any processing of your information you can contact us outlining what processing of information you would like to object to.

Have the information blocked, anonymised or deleted

If you would like Execulets to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like to delete, block or anonymised.

To update your preferences, ask us to remove your information from our mailing list or to submit a request to access, update, correct or delete your personal information, please contact us as specified in the “How to contact us” section below.

Opting out of processing

You can opt out of the collection of personal information by contacting us in the “how to contact us” section below

Withdrawal of consent

If we obtain your information by consent, you have the right to withdraw any consent you previously provided us.

If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information.

We will apply your preferences going forward. Doing so will mean you cannot take advantage of certain Execulets or affiliate products, services and promotions.

The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.

How to contact us / complaints and feedback

If you would like to make a complaint, would like to access/update your information or change your preferences please email us, using enquiries@execulets.co.uk

Or write to us:

Execulets Ltd
2b Thackerays Lane
Woodthorpe
Nottingham
NG5 4HP

If we fall short of your expectations in processing your personal information of you wish to make a complaint about our privacy practices, please contact us using the above details. Please note that complaints will be acknowledge within 48hrs (excluding weekends and bank holidays) and an estimated time for a full response will be given at this time.

How we protect personal information

The security of your personal information is very important, and Execulets is committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide, or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure, or use. We use SSL encryption on our website from which we transfer certain personal information.

Execulets stores personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

Updating this privacy statement

We will update this statement from time to time, so we suggest that you review this statement at regular intervals. Where we undergo substantial changes to our privacy statement we will endeavour to inform you directly about these changes.



Execulets

QUALITY IS OUR BUSINESS