

GDPR OFFICE MANUAL

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Supplier Appointment Policy

Data Processing Terms & Conditions (Supplier)

Miscellaneous

i. Aboide GPDR can be gathered by contacting IT Proz.

ii. G Mail GDPR Compliance Statement Directly from Google.

iii. Zoopla Compliance Statement Directly from Zoopla.co.uk

1. Introduction

Business: KandopropertiesLtd

Business address: Suite 413 Davis House, 4th Floor, Robert Street, Croydon CR0 1QQ

Tel: 02086881500

Email: kandoproperty@gmail.com

Website: www.kandoproperties.com

ICO Registration number: ZA377259

Application of the Data Protection Principles:

In processing personal data this manual shall demonstrate that I comply with the “data protection principles”, namely that personal data must be:

Processed lawfully, fairly and in a transparent manner.

Collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes.

Adequate and, relevant and limited to what is necessary.

Accurate and, where necessary, kept up to date.

Kept for no longer than is necessary

Kept with appropriate security.

2. Data Protection Measures

To protect clients “Personally identifiable information” (PII) – information that can be used on its own with other information to identify, contact, or locate a single person, or to identify and individual in context or “sensitive personal data” (SPI) – information concerning a data subject’s racial ethnic origin, political opinions, religious beliefs, trade union activities , physical or mental health, sexual life or details of criminal offences, the following measures have been implemented:

- I. Clear desk policy
- II. Remote-wipe mobile data phone function
- III. Locked Office
- IV. Secure Cabinets
- V. Secure Lap top
- VI. Passwords
- VII. Website SSL data encryption
- VIII. Firewalls
- IX. No use of third party memory ticks
- X. Anti-virus/Anti malware
- XI. Software updates
- XII. Confidential shredding
- XIII. GDPR & Fraud and Cyber security training
- XIV. Implemented GDPR Manual

3. Data Flow Capture

- <http://www.kandoproperties.com/> - No Cookies (Google Analytics – www.google.com/policies/privacy)
- Telephone calls through 02086881500 (telephone on website)
Conversation with
Voicemail messages
Message left with reception at Citi base
- Google Diary
- Email: Telephone /visit email messages emailed.
- Visits to office – suite413, 4th Floor, Davis House, Robert Street, Croydon CR0 1QQ: Sign in at reception on the 4th Floor

- Third party suppliers/handlers/processors

Companies House
Public Guardian / Court of Protection

HSBC Bank when funds transferred
Streamline – invoice paid online
Storage – Google Drive

4. List of Data Controllers & Data Processors

DATA CONTROLLERS

A Data Controller means a party that determines the purposes (that is, why the information is being processed) and means (that is, how the information is being processed) of processing.

KandopropertiesLTD

List of DATA PROCESSORS

A Data Processor means a party that processes the personal data on behalf of the Data Controller.

Mark Vlotman (Director)

Minal Pancholi (member of Staff)

GDPR Compliance statement - www.microsoft.com/en-us/trustcenter/compliance

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7. GDPR Protocol Demonstrating Due Consideration of Data Subject's Right

I) The Right to be informed

- Attention drawn to Data Protection Notice on website

- Client Data Protection Privacy and Consent Notice

ii) The Right of Access

Upon receipt of written subject access information request

iii) Within 7 days - send written acknowledgment

Request i) copy passport ii) bill or bank statement dated less than 3 months - to be provided within 7 days - (No Fee)

iv) Substantive response to be provided within 21 days of receipt of ID confirmation - diarise reminder

v) Procedure for checking data:

vi) Check computer - email/diary/Word documents

vii) Check hard copies if document prepared within the last 24 months

viii) Check Open Source for scanned documents

respond to request with information/copy documents in the same format as requested unless otherwise stated or agreed

b Update the SAIR Folder with copies of all communication

xi) The Right to Erasure

Subject to the nature of the rectification and the information/document held.

xii) The Right to Erasure

Where consent is withdrawn, compliance is subject to alternative basis of lawful processing of data e.g. contract or legal obligations.

xiii) The Right to Restrict Processing

Processing is limited to performing to contract, legal obligation and compliance

xiv) The Right to Data Portability

The right to data portability allows individual to obtain and reuse their personal data for their own purposes across different services - Service not provided

xv) The Right to object

Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); Direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics.

xvi) Rights in relations to automated decisions making profiling

7.1) Outside the scope business

What is this privacy policy for?

Kandoproperties Ltd registration number **ZA377259** is committed to protecting your personal information, being transparent about what data we hold and giving you control over how we use it.

The purpose of this privacy policy is to give you a clear explanation about how Kandoproperties Ltd use personal and behavioural information we collect from you when you use our websites and mobile sites such as Kandoproperties.com - collectively called our "Digital Channels".

It is important for you to read this policy in full to understand what information we hold about you, how we may use it and how you can access, update and delete your personal information. By accessing and using our Digital Channels, you are agreeing, or have agreed to, be bound by the Website Terms and Privacy Policy, and you consent to Kandoproperties holding, processing and transferring any personal information that you provide Kandoproperties, as set out in this Privacy Policy.

If you don't have time to read the whole policy now, here are the main reasons we collect different types of information about our users:

- To help us monitor and improve our Digital Channels
- To provide you with a more personalised experience, such as making property suggestions that are relevant to your search criteria
- To send you details about our services, where you have signed up to receive such marketing communications
- Keep the Digital Channels secure and prevent fraud

7.2) Should I read any other information or terms?

Whenever you use our Digital Channels, information may be collected through the use of cookies so you should read our Cookies Policy (COOKIES) for more information about this.

If you're interested in the legal recommendations, we recommend visiting the Information Commissioner's Office website (<http://www.ico.gov.uk>) The ICO regulates data protection and e-privacy in the UK so there is lots of useful guidance about this on their website.

7.3) What are Kandoproperties's privacy principles?

Kandoproperties 's privacy principles, in respect of how it collects, uses and manages your personal information, are summarised as follows:

When we ask for data it's to give something back.

Registering for an account on our Digital Channels gives you access to a growing number of benefits, such as being able to save and compare properties that are of interest. Asking for your name means we know how to talk to you. Knowing your address and property status helps us to allocate the most appropriate member of our team to help you with your property needs and your contact details enables us to contact you regarding our services.

We are clear on what data we hold and what we do with it.

In collecting and using your personal information, we will be clear about what we are doing and make sure that you understand the way in which we are using it. Also, we won't sell your information to anyone.

7.4) You control the data we hold on you.

If requested, we will delete your personal information securely and swiftly and all the information we hold on your activity on our Digital Channels will be anonymised, so we won't know it's yours.

We will have in place appropriate security measures to protect your information from unauthorised access and will only work with third parties necessary to the completion of any services you requested from us.

7.5) Compliance with laws and your rights

There are various laws and regulations which apply to data protection and data privacy including the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003 and 2011 (as may be updated or amended from time to time).

At Kandoproperties, we make sure we stick to these data protection and e-privacy laws. As mentioned above, information about the laws, and your rights, can be found on the ICO's website - www.ico.gov.uk.

7.6) What information will Kandoproperties collect about me?

Kandoproperties may collect and hold the following information about you:

- Information you provide to us such as when you complete a digital service enquiry form, or register for an account, email notifications and/or newsletters (e.g. registering on kkrich.com to access the account area and/or subscribing to property alerts). On registration with Kandoproperties.com, we currently ask for your first and surname, your email address, telephone, house number and postcode, your property status, and a password. We ask you for this information, so we can offer you relevant local content, information or services. We will always be clear about how this information will be used.
- Information we collect using cookies or similar technologies stored on your device are about how you use our Digital Channels. Cookies are very useful and do lots of different jobs which help to make your experience on our Digital Channels as smooth as possible. For example, they let you move between web pages efficiently, remembering your preferences, and generally improve your user experience. We provide much more information about how we use cookies and other similar technologies in our Cookies Policy.
- Any other information that you choose to send to us.

7.7) Information from our web servers' logs, such as IP addresses

This is used by us (Kandoproperties referred to as 'us' and 'our') to analyse activity on all our Digital Channels. For example, this helps us to look at the number of visits to specific pages to evaluate if we have sufficient infrastructure to support and maintain a great experience for our visitors. We may also collect, store and use the following kinds of information: Information about your computer, your visits to and use of this website (including but not limiting to your IP address, browser type and version, operating system, referral source, length of visit, page views).

7.8) Information from social networking sites (such as Facebook and Twitter)

We collect information from social media activity, including likes, shares and tweets on our Digital Channels and about our content on social networking sites. Where you sign in to your account on Kandoproperties using social network credentials, such as a Facebook log-in, you grant permission to the social network to share your user details. Depending on the network this will include basic account information such as name, email address, property status and any other details you choose to share according to your Facebook account settings. We may from time to time, on different apps and services, request more than just basic account information from you. We will always be clear about this up front, but you should also check what permissions we are asking for before you connect with these apps and services. If you remove the Kandoproperties app from your social network settings, we will no longer be able to access this information.

Personal information of others.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with the terms of this privacy policy.

7.9) How will we use this information?

Kandoproperties will use the information we collect about you in the following ways:

- To help us to monitor, analyse and improve our Digital Channels. This information helps us to understand which Kandoproperties content and services are most interesting, helpful to our users and if they are shared via social networks. The information also helps us to identify when errors occur within our Digital Channels and test different versions of a page or feature to see which one works best. All of which helps us improve our Digital Channels for our users.
- To provide you with a more personalised experience. By looking at the information we have about you, we can create a more tailored experience. For example, we will do this by making property suggestions.
- To inform the way we commission future content at Kandoproperties. We will use aggregated and anonymous user data to help our Digital Marketing team understand what type of content our users like so that they can make more in the future.
- To market services to you. We will send you information about our Digital Channels and Services or other marketing activities but only where you have agreed to receive these from us and for the purposes stated at the collection point. We will email you or send you other marketing communications relating to Kandoproperties services which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology. You can inform us at any time if you no longer require marketing communications. For instance, to provide you with password reminders or to contact you about services you have submitted to us via our Digital Channels so that we are able to deliver these services to you.
- We may also invite you to participate in surveys from time to time to help us understand what you think about our programmes, products and services, and in turn make them better.

7.10) I am a user aged 16 or under.

Please note that you need to be 16 or over to register on any of Kandoproperties Digital Channels. If you are aged 16 or under, please speak to your parent/guardian to get their permission before you provide any personal information to Kandoproperties because without this consent, you are not allowed to provide us with personal information. We may also ask for your parent/guardian's contact details so that we can check they are happy for you to use our Digital Channels.

7.11) Does Kandoproperties privacy policy apply to third party websites or social networking sites?

This policy only applies to our use of your information via the Kandoproperties Digital Channels. Therefore, it does not apply to third party websites to which Kandoproperties might provide links or on which Kandoproperties content is embedded. Kandoproperties is not responsible for the privacy practice or content of such websites.

Equally, it is important to note that when you access Kandoproperties Digital Channels via a social networking site, such as Facebook or Twitter, that site may also collect and use your information. So, we would advise you to check the privacy policies for those social networking sites and applications to see how your information is being used.

See more about third party cookies in our Cookies Policy

7.12) How can I manage cookies?

We provide more information about cookies and similar technologies used on our Digital Channels in our Cookies Policy - COOKIES. This also tells you how to control and manage cookies in your browser and how to opt-out of certain types of cookies.

7.13) What about spam?

We will only send targeted messages that we feel are relevant and are of interest to you.

Marketing emails you have signed up to will also tell you how you can unsubscribe should you decide that you no longer wish to receive them.

Please note that active clients may receive important information about Kandoproperties Services that they have requested from us (such as changes to the Services themselves or other service administration matters). As an active user, this is not spam.

7.14) Will Kandoproperties share my information with anyone else?

Kandoproperties commits to keeping your personal information confidential and safe:

- We won't sell your data to any third party.
- Other than is required by law or as set out in this Privacy Policy, Kandoproperties Group will not disclose, rent or sell the Personal Information to any third party that is not required to fulfil the services requested, without your permission.
- We may disclose your personal information to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling.

- Employees, contractors and agents of Kandoproperties may be given access to any personal information which Kandoproperties collect but their use shall be limited to performance of their duties in relation to the services provided by Kandoproperties.
- Kandoproperties will take reasonable precautions to prevent the loss, misuse or alteration of your Personal Information. Those who have access to your personal information are required to keep that information confidential and are not permitted to use it for any purposed other than that to the services and products offered by the Group or the use of our Digital Channels.
- Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- Unfortunately, the sending of information via the internet is not completely secure. Although we will do our utmost to protect your information, we cannot guarantee the security of your data sent to our Digital Channels; any sending of information is therefore at your own risk.

7.13) How long does Kandoproperties keep my personal information?

We will keep your information only for as long as it is relevant and useful for the purpose for which it was originally collected. Kandoproperties will remove the personal information when requested by you.

When using our Digital Channels anonymised data will be collected to help you navigate the website, we won't be able to recognise that data as yours or contact you about it will be collated. Please note if you don't want to continue to receive relevant targeted advertising from our Digital Channels after you have left the Digital Channels, we recommend that you delete any cookies set on your device. If you want more information on how to manage your cookies, our Cookies Policy can help.

Where we hold other information (resulting from, for example, submitted competition answers) we will keep this for the minimum amount of time necessary for the purposes of running the competition or other relevant purpose.

Please note that if your account appears to have not been used for 2 years, we may try and contact you to check whether it is still in use and/or we may delete it.

7.14) How can I access and update my personal information?

You can update some of your personal information by signing in to Kandoproperties.com using your email address and password and visiting your details page. In addition, Contact Us and we will be able to update your records on our data management systems - please let us know if the personal information which we hold about you needs to be corrected or updated.

7.15) Access to your information.

If you would like to know what personal information KK Rich Estates s holds about you, you may make a request to Kandoproperties for copies of this information. You should be aware that we will need to see proof of identity before processing any such request (known as a 'subject access request'). If requested, Kandoproperties will use reasonable efforts to supply, correct or delete information about you on file.

All subject access requests should be made in writing and addressed to KandopropertiesLtd

7.16) Changes to this policy.

Our privacy policy may change, update or be altered from time to time. Any changes we may make to our privacy policy in the future will be posted on this page. You should check this page occasionally to ensure you are happy with any changes. We may also notify you of changes to our privacy policy by email.

7.17) How do I contact Kandoproperties if I have a question about privacy issues?

If you have any questions or concerns about privacy issues, you can contact the Marketing department via email at info alternatively send your enquiry to: Kandoproperties 4th Floor, Suite 413, Davis House, Robert Street, Croydon, CR0 1QQ.