

LKL Homes Terms and Conditions

Your use of this website is subject to the Terms and Conditions as set out here and as may be amended from time to time by LKL Homes Limited. These terms and conditions are issued on behalf of LKL Homes Limited. When we mention LKL Homes Limited, “we” “us” or “our” in these terms and conditions we are referring to LKL Homes Limited.

This website is the property of LKL Homes Limited of First Floor 85 Great Portland Street, London, W1W 7LT. LKL Homes Limited is registered in England and Wales, registration number 2235707.

The user confirms that the Terms and Conditions and use of this website shall be governed by the laws of England and Wales and that any and all disputes arising therefrom shall be subject to the exclusive jurisdiction of the English courts.

Your use of the LKL Homes Limited website is confirmation that you have understood and accepted these Terms and Conditions of use, and that you agree and comply with them. If you do not agree to these Terms and Conditions of use you must not use the LKL Homes Limited website.

Acceptable Use Policy

Our acceptable Use Policy, which sets out the Permitted uses and prohibited uses of the LKL Homes Limited website. When using the LKL Homes Limited website, you must comply with this Acceptable Use.

This acceptable use policy sets out the terms between you and LKL Homes Limited under which you may access the LKL Homes Limited website www.lklhomes.co.uk (and all pages linked within its sitemap).

Prohibited Uses

You may use our site only for lawful purposes. You may not use our site:

- In any way that breaches any applicable local, national or international law or regulation.
- In any way that is unlawful or fraudulent, or has any unlawful or fraudulent purpose or effect.
- For the purpose of harming or attempting to harm minors in any way.
- To send, knowingly receive, upload, download, use or re-use any material which does not comply with our content standards.
- To transmit, or procure the sending of, any unsolicited or unauthorised advertising or promotional material or any other form of similar solicitation (spam).
- To knowingly transmit any data, send or upload any material that contains viruses, Trojan horses, worms, time-bomb, keystroke loggers, spyware, adware or any harmful programs or similar computer code designed to adversely affect the operation of any computer software or hardware.

You also agree:

Not to access without authority, interfere with, damage or disrupt:

- Any part of our site;
- Any equipment or network on which our site is stored;
- Any software used in the provision of our site; or
- Any equipment or network or software owned or used by any third party.

Suspension and Termination

LKL Homes Limited will determine, in its discretion, whether there has been a breach of this acceptable use policy through your use of our site. When a breach of this policy has occurred, LKL Homes Limited may take such action as LKL Homes Limited deems appropriate.

Failure to comply with this acceptable use policy constitutes a material breach of the terms and conditions of use upon which you are permitted to use our site, and may result in our taking all or any of the following actions:

- Immediate, temporary or permanent removal of any posting or material uploaded by you to our site.
- Issue of a warning to you.
- Legal proceedings against you for reimbursement of all costs on an indemnity basis (including, but not limited to, reasonable administrative and legal costs) resulting from the breach.
- Further legal action against you.
- Disclosure of such information to law enforcement authorities as LKL Homes Limited reasonable feel is necessary.

LKL Homes Limited exclude liability for actions taken in response to breaches of this acceptable use policy. The responses described in this policy are not limited, and LKL Homes Limited may take any other action LKL Homes Limited reasonably deems appropriate.

Changes to the Acceptable Use Policy

LKL Homes Limited may revise this acceptable use policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes LKL Homes Limited make, as they are legally binding on you. Some of the provisions contained in this acceptable use policy may also be superseded by provisions or notices published elsewhere on our site.

Liability

LKL Homes Limited does not guarantee that the LKL Homes website or any content on it, will always be available or be uninterrupted. LKL Homes Limited may suspend or withdraw or restrict the availability of all or any part of the LKL Homes website for business and/or operational reasons.

LKL Homes Limited makes no warranty that the LKL Homes Limited website is free from errors, defects or viruses.

The content on the LKL Homes Limited website is provided for general information only. It is not intended to amount to advice on which you should rely. You must obtain professional or specialist advice before taking, or refraining from, any action on the basis of the content on the LKL Homes Limited website.

Although LKL Homes Limited make a reasonable efforts to update the information on the LKL Homes Limited website, LKL Homes Limited makes no representations, warranties or guarantees, whether express or implied, that the content on the LKL Homes website is accurate, complete or up to date.

Property Details

All prices are subject to contract. Property details are based upon the instruction of the Seller and do not constitute or form any part of any offer or contract. Legal title is subject to verification from the Solicitors involved.

All floorplans, photographs and 360 virtual tours are for illustration purposes only. Internal measurements are approximate.

It is not LKL Homes Limited policy to test services and domestic appliances and LKL Homes Limited is therefore unable to verify that they are in working order. Your statutory rights are not affected by these conditions.

LKL HOMES LIMITED IS RESPONSIBLE FOR PROCESSING YOUR DATA. WE ARE REGISTERED AS A DATA CONTROLLER WITH THE INFORMATION COMMISSIONERS' OFFICE, THE UK SUPERVISORY AUTHORITY FOR DATA PROTECTION ISSUES UNDER NUMBER ZA507713.

1. Personal data we collect

As a business we collect, use, store and transfer different types of personal data depending on who you are.

If you are purchasing, renting, selling or letting a property through LKL Homes Limited, or purchasing, renting, selling or letting a property from one of our clients, we collect and use your personal data to provide you with our services. The personal data we collect and use may include:

- Identity Data (name, marital status, title, date of birth, gender, national insurance number, username and password, purchases made by you, your interests and preferences, property ownership details or other evidence of your ability to sell or let the property, references, credit checks, details of your immigration status, employment history (current and former employer) feedback and survey responses
- Special Category Data, for example, ethnicity and race, details of criminal offence/convictions, details about vulnerable people in your household, such as children or elderly people (and we may ask for their ages and dates of birth and information about any special requirements they may have) or other information we may require to comply with guidelines on matters of public health or concern (e.g. Covid-19)
- Contact Data (billing address, address (including past address), email address and telephone numbers)
- Financial Data (bank account and payment details, salary, bank details, mortgage statements, credit card details)
- Details of your dependents
- Transaction Data (details about payments to and from you and other services you have purchased through us)
- Technical Data (internet protocol address, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, identification number, online identified, location data and other similar identifying information required for the customer's device(s) to communicate with websites and applications on the internet)
- Usage Data (how you use our website products and services, the full uniform resource locators clickstream to, through and from our site (including date and time), download errors, lengths of visit to certain pages, page interaction information, methods to browse away from the page and any phone numbers you use to call us)
- Marketing and Communications Data (your marketing preferences from us and our third parties and your communication preferences)
- Call recordings (recordings of your conversations with us)
- Any special requirements you may have in relation to attending viewings (such as timing commitments or other requirements).

Where you apply for a role with us and/or are successful we may collect use and store the following categories of personal data about you:

- Information in your application form and CV (including your name, date of birth, gender, NI number, contact details and employment and education history) identity Data (name, marital status, title, date of birth, gender, national insurance number, and driving license), relevant documents evidencing your right to work, information provided by your referees about your employment history, any information you provide to us during the interview process.
- Financial Data
- Marital status
- Information that you provide to us about your health, including disability or medical condition;
and
- Information about criminal convictions and offences
- Information obtained through electronic means such as swipe card or through access control systems
- Location and use of Company vehicle via telemetry, telematics, or other technological data (including video recording).
- Information obtained through your use of any mobile telephone provided to you, including via the internet, information about your use of or through our information and communications system.

We also may collect and use Aggregated Data. For example, when you visit our website we may aggregate data about your usage with the same data from other users to tell us about how certain features on our website are used. This is not usually classified as personal data as whilst it derives from personal data (in the example, it is derived from your Usage Data) the aggregated way that we typically collect and use this data means that it does not reveal your identity to us. If we do link this Aggregated Data to your personal information, it will be treated as personal data in line with this policy.

2. How we collect personal data

We use different methods to collect data from and about you including through:

Direct Interactions

This is the most common source of your personal data. You may give us personal data when you fill in forms or correspond with us by post, phone, email or otherwise. For example, when you:

- Apply for or enquire about our services
- Create an account on our website
- Subscribe to our service or publications
- Request marketing to be sent to you
- Contact us through social media
- Walk – in to our branch office

- Enter a competition, promotion or survey
- Give us some feedback
- Speak with us on the telephone and we record the call
- Make a complaint

Third parties or publicly available sources

As well as by direct interactions with you, we may receive personal data about you from various third parties and public sources. For example, from:

- Payment service providers
- Data brokers or aggregators e.g. Rightmove (based inside the EU, or Facebook (based outside the EU)
- Publicly available sources or registers, e.g. Companies House, HM Land Registry and/or the Electoral Register
- Credit referencing agencies
- Government or Police Databases or registers
- Property portals through which you request our services

Where you apply for a role with us we collect use and store the following categories of personal data about you:

- Information in your application form and CV (including your contact details and employment and education history);
- Relevant documents evidencing your right to work
- Information you provide to us during the interview process
- Information provided by your referees concerning your employment history and
- Information about criminal convictions and offences that you provide to us or that we obtain from the Disclosure and Barring Service

3. How we use your personal data

We may use your personal data for some or all of the purposes listed below. We will only use your personal data for the purposes for which we collected it. If we need to process your personal data for a different purpose that is not compatible with the original purpose we will let you know.

However, we may process your personal data for a different purpose without your consent where it is necessary for us to comply with our legal obligations or where it is otherwise lawful for us to do so.

With your consent (Article 6 (1) (a) GDPR)

We may process your personal data where you have given us your permission to do so or have actively engaged in a means of contact with us.

Examples of ways in which we use your data on this basis include referring you to third party companies who provide other services you may require or be interested in, for marketing purposes where we ask for your consent to send you marketing communications via email or where we use cookies for advertising purposes, as set out in our Cookie Policy, using video or photographic images, messaging or other communications and applications through which you have chosen to engage with us.

Where we are performing our obligations under a contract with you (Article 6 (1)(b) GDPR)

This processing is necessary so that we can perform our obligations to you where you are a customer (or potential customer).

Examples of the way in which we use your personal data on this basis include carrying out your instructions according to your signed terms and conditions, or where you use our services before you sign terms and conditions (e.g. when you request a market appraisal of your property, or when you view a property).

Where we are under a legal obligation (Article 6 (1)(c) GDPR)

We may be required to process your personal data so that we comply with laws or court orders to which we are subject.

Example of the ways in which we use your personal data on this basis include data protection, anti-money laundering, estate and letting agency; other laws, regulations and/or codes of practice by which we are regulated, and/or orders of court to which we are subject or with which we are required to comply.

Where the processing is in our legitimate business interests (Article 6 (1) (f) GDPR)

We may process your personal data to help us operate, grow and protect our business, develop our products and services, help improve our efficiencies, manage our client base, provide training, monitor our customer service standards and/or help resolve disputes.

Examples include network security and monitoring, auditing, call recording (which we also ensure takes place in accordance with the Investigatory Powers Act 2016 by informing callers

that the call may be recorded), training and awareness including compliance, referencing, verification of identity, fraud prevention, risk assessment, utility switches, due diligence, marketing (we may share an encoded version of your email address to third parties such as Facebook and Google to enable these third parties to display LKL Homes Limited ads when you visit their websites), analytics, debt recovery and other claims, the improvement and optimisation of advertising, providing marketing material and content (including providing you with information about goods or services which we feel may interest you as a result of any previous sale or purchase we have negotiated on your behalf and enabling third parties such as Facebook and Google to display LKL Homes Limited ads to you when you use their website) for our website and other applications or platforms through which you interact with us, ensuring that content from our website is presented in the most effective manner for you and your computer, customer support, notifying you about changes to our services and other important notices, managing suppression lists, profiling, cloud storage, when we purchase another business.

In some circumstances we may, to protect our entitlement to a commission and to avoid a dispute, disclose your name to another agent, landlord or vendor.

How we use Special Category Personal Data

Special Category personal data by its nature requires extra protection.

Types of special category personal data we may collect include ethnicity and race, religion, sexual orientation, details of criminal offence/ convictions, details about children in households (ages and dates of birth, etc). We process this data where we have one of the following additional bases of processing:

Your explicit Consent (Article 9 (2) (a))

For example : you have provided your consent (including by interacting with us)

For the purposes of employment and social security (Article 9 (2) (b) GDPR)

For example, we need to comply with employment law

You had already made the personal data publicly available (Article 9 (2) (e) GDPR)

For example, the Electoral Roll or bankruptcy register

To establish, exercise or defend a legal claim (Article 9 (2) (f) GDPR)

For example, where we need to take or defend legal action.

Where we have reasonable suspicion of money laundering Schedule 1, Part 2. Paragraph 15 DPA 2018 Suspicion of money laundering:

For example, during our compliance with Anti – Money Laundering laws

We may also process Criminal conviction data under – Schedule 1, Part 3, Paragraph 33 DPA 2018 Legal claims and/or under the list of exemptions under Schedule 2 DPA 2018

Marketing

You have the right to withdraw your consent for us to use your personal data for direct email marketing purposes at any time. You also have the right to object to our use and/or sharing of your information to third parties for marketing purposes. You may also need to contact those third parties to update your preferences.

If you do withdraw your consent or object, this will result in us ceasing to market goods and services to you and may mean that you will see ads that are less relevant to you on third party platforms.

You can ask us to stop sending you direct email marketing messages at any time by:

- Logging into your 'LKL Homes' account (if you have one) and checking or unchecking relevant boxes to adjust your marketing preferences;
- Following the opt-out links on any marketing message sent to you; or
- Contacting us at any time by emailing

Where you require us to cease use of your personal data for marketing purposes, we will still process your personal data in order to fulfil our contract with you and in accordance with our legal, accountancy and regulatory obligations. If you withdraw your consent, your previous consent will remain valid in respect of our use of your data until you withdraw your consent.

Third – party Marketing

The LKL Homes Limited website may contain links to websites and resources operated and provided by third parties, any such links are provided for you convenience and information only. LKL Homes Limited has no control over their individual content and LKL Homes Limited makes no representations, warranties or guarantees, whether express or implied as to the accuracy or completeness nor as to the suitability or quality of any of products or services offered.

Links to the LKL Homes Limited website may not be included in any other website without the prior written consent of LKL Homes Limited.

We will get your express opt-in consent before we share your personal data with any company outside the LKL Homes Limited to enable those third parties to send you direct email messages regarding their products and/or services for marketing purposes.

If you no longer wish to be contacted by any such third parties for marketing purposes, please follow the instructions in their marketing communications, or consult their privacy policies about how to unsubscribe.

Cookies

The LKL Homes Limited website and applications may automatically collect data about how you use our services in order to help us improve future functionality of our website and to assist with advertising and targeting. We use Google Analytics, which is a web analysis service provided by Google.

To read more about our use of cookies on the LKL Homes Limited website, please consult our Cookie Policy.

4. Disclosures of your personal data

We may disclose your personal data to related third parties. For example (where you have consented for us to do so)

We may disclose your personal data to external third parties. For example:

- IT and system administration service providers
- Anti-money laundering verification service providers
- Tenancy deposit schemes (or deposit replacement service providers)
- Utility switch companies
- Trade contractors
- Survey companies
- Solicitor, surveyors, EPC providers, inventory clerks, managing agents, property auctioneers, auction legal pack providers.
- Local authorities and government law enforcement agencies,
- Government departments (e.g. HM Land Registry),
- Property developers
- Third party data services who help us to segment and understand our audience so that we can send the most relevant and targeted communications possible.
- Advertisers and advertising networks (including social media) to select and serve relevant LKL Homes Limited adverts to you based on the fact that you use that third party network and are a contact of LKL Homes Limited
- Professional advisers acting including lawyers, bankers, auditors who provide consultancy, banking, legal, insurance and accountancy services and insurers based in the United Kingdom (also including rent and legal protection insurers).
- Utility suppliers,
- Credit or reference providers (including for the purposes of debt recovery,
- Other agents with whom we have entered into a sub-agency agreement and where they have introduced a potential purchaser/vendor/landlord/tenant for your property
- The counterparty to your transaction i.e. your landlord/tenant/purchaser or vendor
- Property portals through which you request our services

We may disclose your personal data to other parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

Where you apply for a role with us we may disclose or share your personal information with group companies or our service providers in order to process your application. They are required to take appropriate security measures to protect your personal information and process your personal data only for specified purpose and in accordance with our instructions.

5. Data Security

We are, through technical and organisational means, committed to ensuring the security of, and prevention of unauthorised access to, your personal data. For example, we limit who can access your personal data to those individuals and third parties who need to know it and who are subject to a duty of confidentiality. We also systematically monitor outbound emails for the purposes of protecting confidential and personal data and assisting in our ability to identify potential data breaches. If we become aware of a data breach we will, where we are required to notify the Information Commissioner's Office. If we believe that the data breach is serious, we may notify you as well.

6. International Transfers

We will not transfer your personal data outside of the European Economic Area, except to a country offering the same level of protection for your personal data or to an organisation that commits to abide by the same standards. For example, with certain service providers we may use specific contracts approved by the European Commission which ensures that your personal data has the same protection as it would have in Europe (and you can request a copy of the relevant provisions of these contracts using the contact details below).

7. Data Retention

We will retain your personal data whilst you use our services (or whilst we provide services connected to you) and/or are in communication with us and for at least seven years thereafter, for legal, regulatory and accounting purposes. If we need to retain your personal data for longer, we will take into consideration the potential risks in continuing to store your data against why we might need to keep it. In some circumstances we might anonymise your personal data so it is not associated with you, and we may then use this information indefinitely.

Where you apply for a role with us if your application is unsuccessful, we will retain your personal information for a period of 6 months after we have informed you of our decision so that we can show that we have not discriminated against candidates on prohibited grounds. We will retain your personal data on our file for a further period of 18 months after we have informed you of our decision so that we can consider you for future LKL Homes Limited vacancies. If you would prefer we did not, please email us at office@lklhomes.co.uk

8. Your legal rights

To the extent provided by law, you have the right to:

Access a copy of the personal data that we hold and process about you. You have rights to the following information, subject to certain exemptions:

- The purpose(s) for which we are processing your information;
- The categories of personal information we hold about you
- The recipients or categories of recipients to whom the personal data have been or will be disclosed;
- The period for which we will store your information, or the criteria used to determine that period;

Object to the use of your personal data (including for marketing purposes) by

- Informing a LKL Homes Limited telephone operator; or
- By ticking the relevant boxes on the data collection forms; or
- By logging into your LKL Homes Limited account (if you have done) and checking or unchecking relevant boxes to adjust your marketing preferences; or
- By emailing

Please note that even if you refuse marketing, we will still contact you to discuss the services you have asked us to provide to you or to tell you about changes to our terms and conditions:

- Rectification of any inaccurate information we hold about you;
- Erasure of the personal data we hold about you;
- Ask that we do not make decisions about you using completely automated means; and/or
- Ask that personal data we hold about you is, where technically feasible, transmitted to a third-party chosen by you, in a commonly used, machine-readable format.

The rights listed above may not apply in certain circumstances. Therefore we may not always be able to comply with your request. We will tell you if this is the case. We will usually respond to a request from you to exercise your rights within one month of receipt, but it might take longer if your request is particularly complex or if you have made a number of requests.

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.

Generally, you do not have to pay a fee to exercise these rights, but you may have to pay a fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request.

9. How to contact us

To contact us about how we handle your personal data, please contact our Data Protection Officer at office@lklhomes.co.uk . Alternatively, write to us at Data Protection Officer, LKL

Homes Limited, First Floor 85 Great Portland Street, London W1W 7LT. If you have a complaint about the way in which your personal data has been processed you have the right to contact the Information Commissioner's Office but we would suggest that you first complete our internal complaints procedure and we will try to address your concerns.

Appropriate Policy Document

1.About this policy

- This is the “appropriate policy document” for LKL Homes Limited setting out how we will protect Special Categories of Personal Data and Criminal Convictions Data.
- This policy supports LKL Homes Data Protection Policy and adopts its definitions.
- This document meets the requirement of the Data Protection Act 2018 that an appropriate policy document be in place where Processing Special Categories of Personal Data and Criminal Convictions Data in certain circumstances.

2.Definitions

Data Controller: an organisation which processes personal data and controls the way it is used.

Criminal Convictions Data: personal relating to criminal convictions and offences, including Personal Data relating to criminal allegations and proceedings.

Data Retention Policy: explains how the organisation classifies and manages the retention and disposal of its information. Time periods for retention are set out in the retention schedule.

Data Subject: An individual who can be identified from their personal data.

Data Privacy Impact Assessment (DPIA): tools and assessments used to identify and reduce risks of a data processing activity. A DPIA can be carried out as part of Privacy by Design and should be conducted for all major system or business change programme involving the Processing of Personal Data.

DPA 2018: the Data Protection Act 2018.

Data Protection Officer (DPO): the person required to be appointed in specific circumstances under the GDPR. Where a mandatory DPO has not been appointed, this term means a data protection manager or other voluntary appointment of a DPO or refers to the organisation's data privacy team with responsibility for data protection compliance.

GDPR: the General Data Protection Regulation ((EU) 2016/679).

Personal Data: Information from which an individual can be directly or indirectly identified. Personal Data includes Special Categories of Personal Data.

Privacy Notice: A notice to individuals informing them of their rights and the way their personal data is used.

Processing or Process: any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

Special Categories of Personal Data: Categories of particularly sensitive personal information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.

3. Why we process Special Categories of Personal Data and Criminal Convictions Data

We process Special Categories of Personal Data and Criminal Convictions Data for the following purposes:

- Assessing an employee's fitness to work;
- Complying with health and safety obligations;
- Complying with the Equality Act 2010;
- Checking applicants' and employees' right to work/right to rent in the UK;
- Verifying that candidates are suitable for employment or continued employment;
- Complying with other legislation e.g. Anti-Money Laundering regulations; and
- Addressing public health interests and concerns to ensure the safety of our staff, customers and others with whom they may share a household.

Personal data protection principles

The GDPR requires personal data to be processed in accordance with the six principles set out in Article 5(1). Article 5(2) requires controllers to be able to demonstrate compliance with Article 5(1).

We comply with the principles relating to Processing of Personal Data set out in the GDPR which require Personal Data to be:

- Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency);
- Collected only for specified, explicit and legitimate purposes (Purpose Limitation);
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation);
- Accurate and where necessary kept up to date (Accuracy);
- Not kept in a form which permits identification of Data Subjects for longer than is necessary for the purpose for which the data is Processed (Storage Limitation); and
- Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).

We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (Accountability).

4.Compliance with data protection principles

1.Lawfulness, fairness and transparency

Personal Data must be processed lawfully, fairly and in a transparent manner in relation to the Data Subject.

We will only Process Personal Data and lawfully and for specified purposes. The GDPR restricts our actions regarding Personal Data and Criminal Convictions Data only if we have a legal ground for Processing and one of the specific Processing conditions relating to Special Categories of Personal Data or Criminal Convictions Data applies. We will identify and document the legal ground and specific Processing condition relied on for each Processing activity.

When collecting Special Categories of Personal Data and Criminal Convictions Data from Data Subjects, we do so either directly from Data Subjects or indirectly (for example from a third party or publicly available source). We provide Data Subjects with a Privacy Notice setting out all the information required by the GDPR.

Lawful Processing basis	Processing condition for Special Categories of Personal Data
Data concerning health Compliance with a legal obligation (<i>Article 6 (1) (c)</i>) or necessary for the performance of a contract with the Data Subject (<i>Article 6 (1) (b)</i>).	Necessary for the purposes of performing of exercising obligations or rights which are imposed or conferred by law on us as the controller or the Data Subject in connection with employment, social security or social protection: (<i>Paragraph 1 (1)(a), Schedule 1, DPA 2018.</i>) or meets one of the substantial public interest conditions set out in Part 2 of Schedule 1 to the DPA 2018.
Racial or ethnic origin data Compliance with a legal obligation (<i>Article 6 (1)(c)</i>).	Necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us as the controller or the Data Subject in connection with employment, social security or social protection: (<i>Paragraph 1(1)(a), Schedule 1, DPA 2018.</i>)

Lawful Processing basis	Processing condition for Special Categories of Personal Data
<p>Criminal Convictions Data Compliance with a legal obligation (Article 6 (1) (c)) or in legitimate interests (Article 6 (1)(f)) which are not outweighed by the fundamental rights and freedoms of the Data Subject.</p>	<p>Necessary for the purpose of performing or exercising obligations or rights which are imposed or conferred by law on us as the Controller or the Data Subject in connection with employment, social security or social protection. (<i>Paragraph 1 (1)(a), Schedule 1, DPA 2018.</i>) Meets one of the substantial public interest conditions set out in Part 2 of Schedule 1 to the DPA 2018 (such as preventing or detecting unlawful acts). (<i>Paragraph 10 (1), Schedule 1, DPA 2018.</i>)</p>
<p>Equal opportunity data In our legitimate interests (Article 6 (1)(c)) or in legitimate interests (Article 6(1)(f)) which are not outweighed by the fundamental rights and freedoms of the Data Subject.</p>	<p>Necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained. (<i>Paragraph 8 (1) (b), Schedule 1, DPA 2018.</i>) or meets one of the substantial public interest conditions set out in Part 2 of Schedule 1 to the DPA 2018.</p>

2.Purpose limitation

Personal Data must be collected only for specified, explicit and legitimate purposes. They must not be further Processed in any manner incompatible with those purposes.

We will only collect personal data for specified purposes and will inform Data Subjects what those purposes are in a published Privacy Notice. We will not use Personal Data for new, different or incompatible purposes from those disclosed when it was first obtained unless we have informed the Data Subject of the new purposes and they have consented where necessary **OR** if we use Personal Data for a new compatible purpose then we will inform the Data Subject first.

3.Data minimisation

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

We will only collect or disclose the minimum Personal Data required for the purpose for which the data is collected or disclosed. We will ensure that we do not collect excessive data and that the Personal Data collected is adequate and relevant for the intended purposes. For example, we will regularly review any special measures that we ease or limit such measures that we put in place from time to time in order to address public health concerns and will ease or limit such measures once they are no longer necessary to address the concern.

4.Accuracy

Personal Data must be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.

We will ensure that the Personal Data we hold and use is accurate, complete, kept up to date and relevant to the purpose for which it is collected by us. We check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards. We take all reasonable steps to destroy or amend inaccurate or out-of-date Personal Data.

5.Storage limitation

We only keep Personal Data in an identifiable form for as long as is necessary for the purposes for which it was collected, or where we have a legal obligation to do so. Once we no longer need Personal Data it shall be deleted or rendered permanently anonymous and, for example, specific health data which is collected in order to address particular public health concerns from time to time will be isolated within our systems so that it can be easily identified and erased when no longer needed.

We maintain a Data Retention Policy and related procedures to ensure Personal Data is deleted after a reasonable time has elapsed for the purposes for which it was being held, unless we are legally required to retain that data for longer.

We will ensure Data Subjects are informed of the period for which data is stored and how that period is determined in any applicable Privacy Notice.

6.Security, integrity, confidentiality

Personal Data shall be Processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful Processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

We will implement and maintain reasonable and appropriate security measures against unlawful or unauthorised Processing of Personal Data and against the accidental loss of or damage to Personal Data, including by strictly limiting access rights to certain datasets.

7.Accountability principle

We are responsible for, and able to demonstrate compliances with these principles. Our DPO is responsible for ensuring that we are compliant with these principles. Any questions about this policy should be submitted to the DPO.

We will:

- Ensure that records are kept of all Personal Data Processing activities, and that these are provided to the Information Commissioner on request.
- Carry out a DPIA for any high-risk Personal Data Processing to understand how Processing may affect Data Subjects and consult the Information Commissioner if appropriate.
- Ensure that the DPO can provide independent advice and monitoring of Personal Data handling, and that the DPO has access to report to the highest management level.

- Have internal processes to ensure that Personal Data is only collected, used or handled in a way that is compliant with data protection law.

5.Our policies on retention and erasure of personal data

We take the security of Special Categories of Personal Data and Criminal Convictions Data very seriously. We have administrative, physical and technical safeguards in place to protect Personal Data against unlawful or unauthorised Processing, or accidental loss or damage. We will ensure, where Special Categories of Personal Data or Criminal Convictions Data are Processed that:

- The Processing is recorded, and the record sets out, where possible, a suitable time period for the safe and permanent erasure of the different categories of data in accordance with our Data Retention Policy.
- Where we no longer require Special Categories of Personal Data or Criminal Convictions Data for the purpose for which it was collected, we will delete it or render it permanently anonymous as soon as possible.
- Where records are destroyed we will ensure that they are safely and permanently disposed of.

Our Privacy Policy explains how Data Subjects' Personal Data will be handled, and this includes the period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period. The Privacy Notice is also available on our website.

6.Review

This policy on Processing Special Categories of Personal Data and Criminal Convictions Data is reviewed bi-annually.

The policy will be retained where we process Special Categories of Personal Data and Criminal Convictions Data and for a period of at least six months after we stop carrying out such processing.

A copy of this policy will be provided to the Information Commissioner on request and free of charge.

Dated: December 2021

Review date: Yearly

Next review: December 2022

For further information about our compliance with data protection law, please contact our DPO at

Anti-Money Laundering

LKL Homes Limited is committed to operating its business in a transparent and open manner consistent with our legal and regulatory obligations. We are aware that the real estate industry is a target for organised criminals seeking to launder the proceeds of criminal activity. We always seek to prevent this activity by cooperating fully with the authorities and reporting suspicious activity to the National Crime Agency.

As part of this commitment, we adopt a strict compliance of all Anti-Money Laundering rules, with specific emphasis on the Proceeds of Crime Act 2002, the Money Laundering Regulations 2017, the Bribery Act 2010 and the Terrorism Act 2000.

LKL Homes Limited policy commitment is applicable to all of our customers, including vendors, buyers, landlords and tenants. As a result we obtain and hold for a period of at least seven years evidence pertaining to our customers' identity and, where appropriate, we obtain proof of ownership of property and source/destination of funds. We will be unable to proceed with any work on behalf of our customers if we are unable to obtain this information. Customers' identity will be subject to an electronic identity check, which may also include a credit check.

We are registered and supervised by HM Revenue and Customs for compliance with the Money Laundering Regulations 2017. If you would like to speak to us about Anti-Money Laundering, please email office@lklhomes.co.uk

Indemnity

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