

# FULL CONSUMER PRIVACY POLICY

## WHO WE ARE

This Privacy Policy covers **BonShui Limited** and any of Our current or future subsidiary companies under Section 1159 Companies Act 2006 (referred to as “We” or “Us” or “Our” or “BonShui”).

**BonShui Limited** is registered in England, number 16884642. Our registered office address is 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, United Kingdom;

We are the providers of the **BonShui** mobile application software (referred to as the “App”) and the websites and domains [www.bonshui.ai](http://www.bonshui.ai) (referred to as the “Site”), along with [www.bonshui.app](http://www.bonshui.app), [www.bonshui.com](http://www.bonshui.com) and [www.bonshui.co.uk](http://www.bonshui.co.uk) (together referred to as “Our Other Domains”) and any other Services, Platform(s) or Domains that We may operate in the future.

Our consumer Privacy Policy covers users of our consumer websites, suppliers and prospective suppliers, job applicants and journalists.

If you are a customer of **BonShui** operating in a business to business capacity and have a professional membership with Us, please refer separately to our Professional Membership Privacy Policy.

If you are an employee of **BonShui**, please refer to our Employee Privacy Policy made available to you via our HRIS during your the onboarding phase of Your employment with Us.

“*Members*” include estate agents, commercial agents, letting agents, managing agents, landlords, new homes developers, housing associations, overseas property owners, Build to Rent developers, surveyors, banks, building societies, insurance companies, mortgage brokers, other lenders and financial institutions, Government departments, executive agencies, quangos, academic institutions, professional advisors and selected CRM software providers whom we have a commercial relationship with. We are not an estate agency.

“*Partners*” are selected companies whom We choose to work with whom we have a commercial relationship with to offer complimentary Services such as financial services (e.g. mortgage in principle), currency exchange, utilities and broadband.

“*Prospective Members*” means businesses who have contacted Us to enquire about becoming a Member or who We have identified as a potential customer.

“*Services*” or “*Service*” include property advertising, insurance and tenant related services (which includes tenant referencing, rent guarantee insurance, landlords’ contents and/or liability insurance, tenant’s contents and/or liability insurances, utilities and broadband), stamp duty land tax calculator, valuation and surveying tools, property price tracking tools and financial services (which includes mortgage in principle decision and mortgage calculator).

“*Suppliers*” and “*Prospective Suppliers*” means any external third parties whom we may engage to enable us provide the Service or Services.

“**BonShui**” or “**bonshui**” means **BonShui Limited** and any or all of its subsidiary companies.

## WE PROVIDE OUR PLATFORM(S) SO THAT:

- ▶ an Agent can advertise property details for You to view;
- ▶ We, or an Agent, can provide insurance, tenant and financial services to You;
- ▶ We can provide You with access to housing market trends and historical property data;
- ▶ We and Our partners can provide complimentary services to You; and
- ▶ We can provide an Agent access to valuation and surveying tools.

References to “Subscribers”, “You”, “Yourself” or “Your” is a reference to individuals using Our Platform(s) or Services.

References to “Personally Identifiable Information” (PI) or “Personally Identifiable Information” (PII) means information that will allow Us to identify You and is set out in more detail in the “Personally Identifiable Information We Collect” sections below.

## INTRODUCTION

We are committed to protecting Your privacy. This privacy policy (referred to as the “Policy”) explains how and for what purposes We use the Personally Identifiable Information collected about You when You use the Site or download and use Our App on Your mobile device (“Device”). Please read this Policy carefully.

In the tables below We set out the types of Personally Identifiable Information We collect, where it comes from, why We collect it, Our lawful basis for processing the Personally Identifiable Information and how long We will keep it for.

Our Platform(s) are not intended for anyone under the age of 18 (referred to herein as “Children” or “Child”). If You become aware that Your Child has provided Us with Personally Identifiable Information without Your consent, please contact Us on [dpo@bonshui.ai](mailto:dpo@bonshui.ai) and We will, upon verification, delete such Personally Identifiable Information.

If You have a query about Personally Identifiable Information relating to Your property on the Platform(s), please contact Your estate agent or lettings agent directly or alternatively contact Us on [say.hello@bonshui.ai](mailto:say.hello@bonshui.ai).

## CONTACTING US

We recommend You contact Us via email. If You prefer to correspond with Us via post, there may be a delay in Us receiving and responding to Your postal enquiries and therefore email correspondence is recommended for a quicker response.

If You would like to stop receiving direct marketing from Us please contact Us via email at [cancel.dm@bonshui.ai](mailto:cancel.dm@bonshui.ai) or please write to the Customer Services Team, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, United Kingdom and where possible include a copy of the communications You have received.

If You have any questions about this Policy or Our use of Your Personally Identifiable Information or would like to submit a subject access request or exercise Your other data subject rights, please contact Our Data Protection Officer/Team via email at [dpo@bonshui.ai](mailto:dpo@bonshui.ai) or please write to The Data Protection Officer, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, United Kingdom.

If You are located outside the UK but within the EEA, You may wish to contact our EU representative by email at [eu.eea@bonshui.ai](mailto:eu.eea@bonshui.ai).

## **PERSONAL INFORMATION WE COLLECT**

### **PROPERTIES VISIBLE ON OUR PLATFORMS**

#### **WHAT WE COLLECT AND WHERE IT COMES FROM**

- ▶ In the course of providing Our Services, We collect property data such as images of properties, including videos and virtual tours, property asking prices, sales history and sold prices, property addresses, floor-plans, property locations and property descriptions; and
- ▶ The property data is provided to Us by an Agent or other third parties on behalf of those Members.

#### **WHY WE COLLECT IT**

We will use this information for a number of reasons including:

- ▶ to provide Our Platform(s);
- ▶ to enable potential purchasers or tenants to see detailed descriptions and images of properties that they may be interested in;
- ▶ to allow Subscribers to see current property trends such as the prices of houses for sale in their local area;
- ▶ to allow Subscribers to check broadband speeds, broadband deals and energy deals for properties;
- ▶ for Our own commercial purposes such as to identify trends in the property market, to build property databases and automated survey and valuation tools for an Agent to use and to promote Our Platform(s) and Services on social media and other third-party platforms; and
- ▶ to provide an Agent with updates on properties advertised on Our Platform(s).

### **OUR LAWFUL BASIS FOR PROCESSING THIS PERSONALLY IDENTIFIABLE INFORMATION**

We have a legitimate interest to process this Personally Identifiable Information.

These legitimate interests are:

- ▶ providing a Service to potential purchasers and tenants so that they know what properties are currently on the market, the price of those properties and local comparables;
- ▶ to provide access to detailed data on those properties such as broadband speeds, crime levels, schools, and the cost of utilities via Our relationships with Our Partners; and
- ▶ to help Us benchmark the performance of Our Sites and Our App and identify requirements for additional functionality.

## HOW LONG WE WILL KEEP IT FOR

We will stop actively including a property in our search results when We can see that it has been removed from the market. However, the property information may remain available on the Platform(s) as historical property information to allow Subscribers to benefit from Services such as identifying previous for sale or sold prices (please see “Historical property data” for further information).

## HISTORICAL PROPERTY DATA

### WHAT WE COLLECT AND WHERE IT COMES FROM

If a property has previously been actively marketed on the Platform(s), We will continue to display it on the Platform(s) as historical property information. If You have any concerns about any historical property information available on the Platform(s), please see the section of this Policy entitled “Removing Property Data from Our Platform(s)” (below); and

We also have data that relates to historical property listings on the Platform(s) which We collect from other third parties. For example, We obtain the sold prices of the properties from the Land Registry (or the Land Register of Scotland) and display those sold prices on the Platform(s).

### WHY WE COLLECT IT

We will use this information:

- ▶ To assist potential purchasers and tenants when forming a view about historical market trends and potential property values;
- ▶ To assist vendors when researching the approximate value of their property;
- ▶ To enable Subscribers to see detailed property descriptions and images of properties in areas that they may be interested in;
- ▶ To allow Subscribers to see similar properties sold by an Agent across Our Platform(s).
- ▶ To allow Subscribers to see property trends that they may be interested in, such as the previous sale and sold prices of properties in their local area; and
- ▶ For Our other commercial purposes, such as to identify trends in the property market and to build property databases and automated survey and valuation tools for an Agent to use.

### OUR LAWFUL BASIS FOR PROCESSING THIS PERSONALLY IDENTIFIABLE INFORMATION

We have a legitimate interest to process this Personally Identifiable Information.

These legitimate interests are:

- ▶ To enhance the Service that We provide on Our Platform(s) and providing a Service that benefits an Agent, Subscribers, vendors, landlords, potential purchasers and tenants;
- ▶ To provide a Service to an Agent by assisting them to more accurately value other properties;
- ▶ To provide a Service to vendors and landlords which helps them form a view about;
- ▶ the value of their properties;
- ▶ which Members they may wish to contact to value/market their property;

- ▶ Providing a Service to potential purchasers and tenants in understanding what properties have been on the market and the prices of those properties;
- ▶ To provide data services to third parties such as surveyors, banks, building societies, insurance companies and other financial institutions so that they can process this historic property data for their purposes; and
- ▶ To provide property valuation tools and surveyor comparison software to an Agent.
- ▶ For research and statistical purposes.

### **HOW LONG WE WILL KEEP IT FOR**

To the extent that property data is also Personally Identifiable Information, it is generally the case that it ceases to be Personally Identifiable Information over time. The historic property data is retained by Us whilst it is required by Us to provide the Services summarised in the section headed “*Why We collect it*”.

## **PERSONAL INFORMATION YOU GIVE TO US**

### **WHAT WE COLLECT AND WHERE IT COMES FROM**

We will collect the Personally Identifiable Information that You give to Us when using Our Platform(s) or Services. If You choose to access a particular search feature, request information or fill in a form on the Platform(s) You may be asked to provide Personally Identifiable Information about Yourself, such as:

- ▶ Your name, address and contact details;
- ▶ details of the sort of property You are interested in;
- ▶ the cost and location of the property;
- ▶ Your current residential address;
- ▶ what stage in the home moving process You are at;
- ▶ whether You are a first time buyer, a buyer, a seller, a landlord, an investor, or a cash buyer;
- ▶ whether You are re-mortgaging;
- ▶ whether You have a property to sell or let;
- ▶ whether You have sold your property;
- ▶ if requesting a digital valuation from Us, whether You have made any changes to your property and information about your property which can help aid a valuation;
- ▶ if requesting an online agent valuation from an Agent and where made available to You, You may choose to provide images of your property and additional information about Your property such as its condition, Your estimated price, quality rating of Your home, characteristics of Your property and other details which can help an Agent value Your property.
- ▶ if requesting an in-person or online agent valuation from an Agent, You will identify which of an Agent You wish to contact and provide additional data such as whether You are the homeowner, what You are looking to do (e.g. remortgage, sell or let) and when You are looking to sell;
- ▶ whether You have completed any affordability checks;



- ▶ when enquiring about properties overseas, We will also ask for:
  - ▶ reason for buying
  - ▶ Your country of residence; and
  - ▶ whether You require assistance and advice from Our Currency Exchange Partner.
- ▶ when enquiring about rental properties, the following information may be requested in addition to the above about whether:
  - ▶ there will be smokers living in the property;
  - ▶ You have any pets and type of pet;
  - ▶ You consent to the agent performing a credit check and date of birth;
  - ▶ Your household income exceeds a set amount;
  - ▶ You are aware of any adverse credit;
  - ▶ Your employment status (if you are a student, We may ask that You have a guarantor);
  - ▶ Your move (move in dates, desired tenancy length, whether renting for first time in the UK, who You are moving in with, how many of the occupants will be over 18 and under 18); and
  - ▶ Where You may not meet the affordability requirements or You have indicated You are aware of adverse credit, We may ask if You have arranged a guarantor.

If You choose to book or request an appointment to view a property via the Platform(s), You may be asked to provide more details, including:

- ▶ Your availability to view the property or selecting a date and time slot to view the property in the calendar made available to You;
- ▶ Your preferred moving date or an indication of when you are looking to move by;
- ▶ details of Your household income as a proxy for calculating affordability in relation to the advertised monthly rental value of a property;
- ▶ whether You have any adverse credit history that could affect Your application;
- ▶ an indication of whether You are moving alone or with others;
- ▶ Your feedback on a property that You have viewed; and
- ▶ Your mobile number and email address for the purpose of providing You updates via text and/or email regarding Your property viewing (includes sending reminders about Your property viewings and to confirm You appointment viewing request).

If You choose to contact a Member using the telephone number on Our Platform(s), calls may be recorded for training, monitoring and quality assurance purposes. We may also process call recordings for the purpose of fulfilling Our contract with an Agent. We may also keep a record of call activity, including missed calls.

### **Registered Subscribers**

Personally Identifiable Information that You provide to Us when You:

- ▶ register as a My **BonShui** User;

- ▶ request property email updates such as Property Alerts about when a property is marketed in Your chosen postcode and meeting Your search parameters;
- ▶ request email updates such as Tracked Property Alerts about the valuation of a property You are tracking;
- ▶ use Our renovation calculator for properties You are tracking (such as size of renovation, type of renovation, whether renovation has been completed or is planned etc.);
- ▶ use Our Services to identify and save places of interest to You, calculate distance and travel time from those destinations to a property You are interested in;
- ▶ send enquiries to our Members. Copies will be available to view in Your My **BonShui** account;
- ▶ book or request property viewings and appointments via Our Site.

Where We have made the following features available to You, these will be available to view in Your My **BonShui** account, giving You the ability to:

- ▶ track a property;
- ▶ access property viewings and appointments booked via Our Site;
- ▶ declare whether You own the property, are a tenant of the property, or are looking to buy the property;
- ▶ add saved properties and notes;
- ▶ update the status of Your property enquiry (such as whether You have viewed the property, purchased the property etc.) and the ability to add saved properties to Your property enquiry list;
- ▶ see a renters checklist so You can add in Your move date and track tasks related to Your move; and
- ▶ share and collaborate property lists and notes with users You choose to share with.

We may also ask what stage in the home moving process You are, whether You are a first time buyer, a seller, tenant, a landlord, investor, whether You are re-mortgaging etc.

If You are undergoing tenant referencing or progressing a tenancy application, where We make the feature available to You, You will be given:

- ▶ visibility of what stage in the tenant referencing process You are at;
- ▶ the ability to progress Your tenancy agreement; and
- ▶ the ability to add in Your move-in date and what rent You pay.

#### **GENERAL USE OF THE PLATFORM(S):**

Personally Identifiable Information that You provide when:

- ▶ downloading the App or registering to use the App;
- ▶ participating in discussion boards or other social media functions on Our Platform(s);
- ▶ entering into competitions, promotions, surveys and market research studies made available on Our Platform(s) or if We contact You by email; phone or otherwise; and
- ▶ engaging with additional Services that are available on Our Platform(s), such as:

- ▶ the stamp duty calculator and mortgage calculator, where you will Provide Us the following Personally Identifiable Information: location, home moving status (whether You are a first time buyer, buying your next home or buying an additional property/investing), re-mortgaging, are an investor and price of the property, Your current Mortgage Lender and the date Your current mortgage deal ends.
- ▶ ability to identify places of interest to You and see travel time from properties.

### **Communications**

Personally Identifiable Information that You provide by corresponding with Us by phone, e-mail, video calls or otherwise; and

If You choose to contact Us by phone or video calls or We call You, calls may be recorded for training, monitoring and quality assurance purposes and for the purpose of fulfilling Our contract with an Agent. Phone calls may be monitored in real time. We may also keep a record of call activity, including missed calls.

### **Investors**

Personally Identifiable Information that You provide to Us when browsing Our investor pages.

### **Insurance Services:**

If You choose to generate a quote or apply for any of Our insurance Services, You may be asked to provide Personally Identifiable Information about Yourself, such as:

- ▶ Your full name including title, email address, phone number;
- ▶ Property address You are looking to move to;
- ▶ Date of birth;
- ▶ Employment status and history;
- ▶ Health data;
- ▶ Race or ethnicity;
- ▶ Disclosure of unspent criminal convictions;
- ▶ Payment card details.

### **Financial Services**

- ▶ If You choose to apply for a mortgage in principle or use Our mortgage calculator, You will be asked to provide Personally Identifiable Information about Yourself. For more information, please see the “*Financial Services*” section in this Policy.

### **Human Resources**

- ▶ Personally Identifiable Information You provide Us when applying for a job vacancy at **BonShui**, such as Your CV and covering letter.

### **Journalists**

- ▶ Where You contact Us as a journalist, We will retain contact data and other Personally Identifiable Information You may choose to provide Us with.

### Prospective Members

- ▶ If You enquire about becoming a Member of **BonShui**, We will collect basic personal identifiers such as Your name, contact data and other Personally Identifiable Information You may choose to provide Us with. Where you formally apply to become a Member of **BonShui** and undergo Our vetting process, please refer to the Agent Privacy Policy about how We process Your Personal Data.

### Suppliers & Prospective Suppliers

- ▶ We will collect basic personal identifiers such as name, email address, job title, contact data and other Personally Identifiable Information You may choose to provide Us with. Where we undertake supplier due diligence checks (including but not limited to sanctions and PEP checks) if You are a person with significant control, We will also collect date of birth, nationality and attestations relating to criminal activity and other Personally Identifiable Information as required to perform the checks.

### WHY WE COLLECT IT

We will use this Personally Identifiable Information:

#### Enquiries to an Agent:

To make sure that You receive the benefit of the Service. This may include:

- ▶ transferring Your property enquiry to an Agent who is advertising that property so that they can respond to Your enquiry only. Some of an Agent may use:
  - ▶ lead handling agencies who handle and process Your enquiry on their behalf; or
  - ▶ third party systems to process and store Your enquiry to allow them to respond to and manage Your enquiry;
- ▶ transferring Your request for a property valuation (including names of an Agent You have chosen to send this valuation request too) onto an Agent You have selected so they can provide You with a valuation;
- ▶ sending Your request to book a property viewing to an Agent who is advertising that property and for Us to confirm Your booking by email or text on an Agent's behalf;
- ▶ sending Your name, address and contact details to an Agent when You request information or a brochure on a property they are advertising, so that they can contact You;
- ▶ where You book an appointment to view a property, We will either create a calendar appointment in an Agent own email system (via calendar software) or an Agent own booking system in order to book/and/ or manage Your booking;
- ▶ transferring other relevant information to an Agent so that they can assess whether the property is suitable for You;
- ▶ allowing You to provide an Agent with feedback on the property once You have viewed it;
- ▶ an Agent must form their own legal basis for processing Your enquiry data if they are processing it for purposes other than responding to Your initial enquiry;
- ▶ When enquiring about rental properties, additional information will be requested to enable the agent to better understand Your circumstances and suitability for the property.

Where an Agent is acquired by another Member, enquiries You have sent will be transferred to the acquiring Member to provide the Services.

Where You have consented to a credit check and based on the information You provide, **BonShui Limited** will provide Us and an Agent with a summary of the credit check result together with an initial indication on Your suitability for the property. It will be up to an Agent to undertake further checks to ascertain Your suitability.

When enquiring about properties overseas, We will also share:

- ▶ whether You have agreed to receive advice from Our Currency Exchange Partner, with an Agent who is advertising the property You are enquiring about for the purpose of assessing Your current situation;
- ▶ A copy of the property enquiry and a link to the property You have enquired about with Our Currency Exchange Partner, where You have agreed to being contacted by Our Currency Exchange Partner for the purposes of being able to respond to Your currency enquiry;
- ▶ Where telephone calls are recorded, this is for training, monitoring and quality assurance purposes and for the purpose of fulfilling Our contract with an Agent.; and
- ▶ To profile Your activity on Our Platform(s), for more information please see the “Profiling” section below.

To enhance the service You receive from an Agent.

#### **Registered Subscribers**

- ▶ To provide You with the benefit of Services for registered Subscribers only;
- ▶ To provide Property Alerts to You (which You have set up) for properties marketed on Our Platform(s) that meet Your search criteria;
- ▶ To provide Tracked Property Alerts to You (which You have set up) for properties You are tracking and their valuation.
- ▶ To provide You access to Our renovation calculator, to help You understand how renovations can impact the value of a property.
- ▶ To provide You with travel times from properties on Our Platform(s) to places which are of interest to You.
- ▶ To provide You access to Your enquires and bookings of viewings You have sent to an Agent;
- ▶ To provide You access to Your renters checklist so You can keep track of tasks related to Your move;
- ▶ Where You have a renters checklist:
  - ▶ where You wish to enquire about energy deals, We will pre-populate the form with the property address You are looking to move to;
  - ▶ provide You the option to share Your details with a removal company where You wish to enquire about their services;
- ▶ To keep You updated on Your account and Services available to You;
- ▶ To provide You customised content on Our Platform(s) including suggesting properties or Services relevant to You and Your stage in the home-moving process;
- ▶ To help an Agent manage their leads by sharing whether You are a Landlord or not when You enquire about a property they are advertising or request a valuation;

- ▶ To keep You updated on Your tenancy journey and provide reminders/notifications relevant to Your move such as postal redirects, broadband options etc.; and
- ▶ To profile Your activity on Our Platform(s), for more information please see the “Profiling” section below.

#### **General Use of the Platform(s):**

- ▶ To provide the Platform(s) to You and enable You to download the App;
- ▶ To enhance the Services that You select on Our Platform(s);
- ▶ To process any queries that You have about **BonShuí** or its Members;
- ▶ To customise and enrich Your experience on Our Platform(s);
- ▶ To contact You for Your views on Our Services and to notify You occasionally about important changes to Our Terms of Use, this Policy or developments to Our Platform(s) or Services;
- ▶ To deliver relevant advertising to You whilst You are on the Platform(s);
- ▶ To deliver targeted advertising to You depending on whether You are a first-time buyer, re-mortgaging or are an investor;
- ▶ To provide You customised content on Our Platform(s) including suggesting properties or Services relevant to You; and
- ▶ To profile Your activity on Our Platform(s), for more information please see the “Profiling” section below.
- ▶ To enable You to participate in competitions via Our Platform(s) and to enable Us to manage the competition, which includes being able to:
  - ▶ contact You regarding Your entry, nomination or prize;
  - ▶ ensuring that You are eligible to enter the competition;
  - ▶ using content You supplied as part of Your entry for marketing campaigns, advertising or promotions.
  - ▶ if you win a prize then We will also:
    - ▶ publish Your name on Our Platform(s) along with details of any content You supplied as part of Your entry;
    - ▶ provide Your contact details (name, email, address) to any company that will supply Your prize.

#### **Communications**

- ▶ To process and resolve any queries that You may have; and
- ▶ For training, monitoring and quality assurance purposes and for the purpose of fulfilling our Members contract where calls (which may include video calls) are recorded.

#### **Investor Relations**

- ▶ To allow You to subscribe for relevant **BonShuí** regulatory alerts; and
- ▶ To process and respond to any queries that You might have.
- ▶ Insurance & tenant related services
- ▶ To provide You a quote for insurance or tenant related services and to send you reminder emails;

- ▶ To process Your application for insurance or tenants related services;
- ▶ To process Your tenancy agreement on behalf of an Agent agent and facilitate payment between You and an Agent;
- ▶ To perform a contract;
- ▶ Where You have consented, to send You direct marketing regarding insurance and tenant related services via email or SMS;
- ▶ Where You have consented, We use the information to perform a Credit Check and/or a reference. Please see Our Tenant and Guarantor Referencing section for more details;
- ▶ To profile Your activity on Our Platform(s), for more information please see the “Profiling” section below;
- ▶ To improve Your experience on Our platforms (for example pre-populating fields and forms, quote requests etc.); and
- ▶ To provide You visibility of the insurance and tenant related Services provided to You (whether that be on Your behalf or on an Agent behalf).

#### **Financial Services**

- ▶ To enable You to gather information which provides transparency around the mortgage process;
- ▶ To help You to understand what You can afford, using Our mortgage calculator;
- ▶ To contact You regarding Your mortgage in principle decision;
- ▶ To allow You to receive a digital mortgage in principle decision from a lender or broker;
- ▶ To receive assistance from a mortgage broker where You have requested this service; and
- ▶ To profile Your activity on Our Platform(s), for more information please see the “Profiling” section below.

#### **Human Resources**

- ▶ To enable You to apply for Our job vacancies with **BonShui Limited**.

#### **Journalists**

- ▶ To respond to Your requests;
- ▶ To add You to Our database of journalists to receive industry and company related press releases; and
- ▶ To contact You by phone, email, video call or otherwise regarding stories that We believe may be of interest to You.

#### **Prospective Members**

- ▶ To help Us respond to Your enquiry.
- ▶ To assess Your suitability as a Member.
- ▶ To add You to Our database of prospects.
- ▶ To contact You by phone, email, video call or otherwise regarding Our Services.

#### **Suppliers & Prospective Suppliers**

- ▶ To assess your suitability as a Supplier and perform supplier due diligence checks.

- ▶ To correspond with You regarding the services being/to be provided.
- ▶ To add You to our supplier CRM system, finance system and other systems used to conduct supplier due diligence and record supplier contracts.

## **OUR LAWFUL BASIS FOR PROCESSING THIS PERSONALLY IDENTIFIABLE INFORMATION**

We have a legitimate business interest to process this Personally Identifiable Information. These legitimate interests are:

### **Enquiries to an Agent:**

- ▶ To provide a service to an Agent and/or to provide a service to You;

### **Registered User:**

- ▶ To provide You with Our Services;

### **General Use of the Platform(s):**

- ▶ To enable You to download and use the App;
- ▶ To allow Us to gain information about the use of Our Platform(s) and any improvements that can be made;
- ▶ To provide advertising space to Agents and third parties;
- ▶ To provide You with relevant content on Our Platform(s);
- ▶ To assist Agents in prioritising their enquiries;
- ▶ To provide You the Services; and
- ▶ To manage and administer competitions including verifying details of Your entry, administering the competition in-line with the CAP Code and retaining records of consent.

### **Communications**

- ▶ To ensure that Your queries are addressed and for training, monitoring and quality assurance purposes where calls (which may include video calls) are recorded;

### **Investor Relations:**

- ▶ To allow You to access **BonShui** regulatory alerts and to ensure that Your queries are addressed;

### **Insurance & tenant related services**

- ▶ To provide You with a quote and to provide access to insurance and tenant related services that may be relevant to You;
- ▶ To process Your tenancy agreement on behalf of an Agent agent and facilitate payment between You and an Agent;
- ▶ To provide an Agent visibility and to help facilitate progression of Insurance and Tenant related services regarding their clients; and
- ▶ To process a credit check and/or reference. Please see Tenant and Guarantor Referencing section for more details.

### **Financial Services**

- ▶ To contact You regarding Your mortgage in principle decision;
- ▶ To enable You to use Our mortgage calculator and to help You understand what You can afford;
- ▶ For more information please see our “Financial Services” section in this Policy;

### **Human Resources**

- ▶ To process Your job application and consider You for Our vacancies;

### **Journalists**

- ▶ To enable direct communication between Us and relevant journalists;

### **Suppliers & Prospective Suppliers**

- ▶ To provide the services, conduct supplier due diligence to assess supplier risk and suitability.

### **Prospective Members**

- ▶ To enable direct communication between Us and You;
- ▶ To keep a prospect record in our CRM database; and
- ▶ To respond to Your enquiry.

We have a contractual reason to process this Personally Identifiable Information:

### **Communications**

- ▶ For the purpose of fulfilling Our contract with an Agent where calls are recorded.
- ▶ Insurance & tenant related services To process Your application and provide You and/or an Agent the Services;

### **Financial services:**

- ▶ To process Your mortgage in principle and provide You the Services;

### **Suppliers:**

- ▶ To provide the services.

We rely on consent for:

- ▶ Allowing an Agent to run a credit check in respect of a rental property You are enquiring about; and
- ▶ Sharing Your information with **BonShuí** to undertake the credit check in respect of a rental property You are enquiring about.

### **Insurance & tenant related services**

- ▶ to send You direct marketing regarding insurance and tenant related services via email or SMS;
- ▶ process Your special category and criminal offence data in order to process Your application;
- ▶ to perform a credit check and/ or reference in respect of a rental property You are enquiring about. Please see Tenant and Guarantor Referencing section for more details; and

- ▶ to share Your details with Our Partners for broadband, energy, and removals where You have consented.

#### **Financial Services**

- ▶ to process Your special category data in order to process Your application for a mortgage in principle.

#### **Prospective Members**

- ▶ to send you direct marketing.

We rely on a legal obligation to process Personally Identifiable Information:

#### **Suppliers & Prospective Suppliers**

- ▶ to conduct verification, identity, PEPs and Sanctions checks and attestations on criminal offence. This is to conduct supplier due diligence to assess supplier risk and suitability

#### **HOW LONG WE WILL KEEP IT FOR**

We will store the Personally Identifiable Information summarised above for the following periods:

#### **Enquiries to an Agent:**

Your initial property enquiry will be kept for 2 years from the date of your enquiry (with the exception of online agent valuation request where We will keep this for 2 years and 7 days). However enquiry data will be kept for two years from the date on which You last used Our Platform(s) or Our Services. After that it will be erased or anonymised so that the data no longer identifies You;

Property images You initially upload to Our Platform(s) as part of the online agent valuation request will be retained for 7 days. When You submit the online agent valuation request the images will be retained for 2 years and 7 days.

Telephone call recordings are stored for a shorter period of time, being three months from the date of the recording, at which point they are deleted; and

Profiling data will be kept for as long as is required, as described in the “*Profiling*” section below.

#### **Registered Subscribers**

Personally Identifiable Information that You provide to Us when You register as a User will be kept for as long as You have an active account setup on **BonShuí**. The Personally Identifiable Information relating to Your account will be deleted when You delete Your account or if Your account has been inactive for 5 years.

Enquiries You have made to an Agent will be accessible in Your **My BonShuí** account for up to 12 months.

#### **General Use of the Platform(s)**

Personally Identifiable Information that You provide when downloading the App, registering to use the App or for accessing in-App services will be retained for as long as You have the App installed on Your device;

Personally Identifiable Information that You provide when participating in discussion boards, enter into competitions, promotions, surveys and market research studies will be retained for no longer than two years;

Personally Identifiable Information that You Provide when identifying places of interest to You and travel times to properties will only be stored for the length of Your session on Our Platform(s) (unless You are a Registered User, in which case We will keep this for longer, please see Registered Subscribers section above for more information); and

Personally Identifiable Information that is provided when You interact with Us through publicly available social media platforms will only be retained on the social media platforms which You use to publicly interact with Us (We will not copy or store it separately) and this Personally Identifiable Information will be retained for as long as You keep it on Your social media accounts (for tweets and direct messaging via social media platforms, please see “Communications” heading below).

### **Communications**

Personally Identifiable Information that You provide to Us when We correspond by telephone, e-mail, direct messaging or tweets through social media will be retained on Our systems:

- ▶ For no longer than 25 months on Our ticketing system from the date of communication or until Your query is resolved.
- ▶ For no longer than 24 months for the original e-mail correspondence (exceptions may apply for a limited number of mailboxes and may be shorter or longer depending on requirements);
- ▶ For no longer than 18 months for recorded calls; and
- ▶ For 3 years where any correspondence relates to either Our insurance and tenant related services or financial services.

### **Investors**

Personally Identifiable Information that You provide to Us when browsing Our investor pages will be kept for as long as You maintain an investor User account on Our investor pages. Any Personally Identifiable Information which We hold in Your investor User account will be deleted when You delete Your investor User account.

### **Insurance & tenant related services**

Personally Identifiable Information You Provide Us will be kept for 3 years or for as long as required to perform a contract;

Where an Agent uses Our Services to create a tenancy agreement for You to sign, We will retain Your Personally Identifiable Information for the following periods:

- ▶ 6 years after tenancy has ended where the application has been successfully completed; or
- ▶ Up to 12 months where a tenancy application has not been signed/and or finalised.
- ▶ Where an Agent uses Our Services to perform a credit check in respect to a rental property You are enquiring about, the credit check will be retained for 3 years. Please see Tenant and Guarantor Referencing section for more details.

### **Financial Services**

We will retain Your Personally Identifiable Information for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for Personally Identifiable Information, We consider the amount, nature, and sensitivity of the Personally Identifiable Information, the potential risk of harm from unauthorised use or disclosure of Your Personally Identifiable Information, the purposes for which We process Your Personally Identifiable Information and whether We can achieve those purposes through other means, and the applicable legal requirements. For more information please see our “Financial Services” section in this Policy.

### **Human Resources**

We retain Personally Identifiable Information for as long as is required to fulfil the purpose (whether that be for the current job application or retaining on file for future job vacancies) or until You notify Us that You wish for Your Personally Identifiable Information to be deleted.

### **Journalists**

We retain Your Personally Identifiable Information until You notify Us that You wish for Your Personally Identifiable Information to be deleted or until Our records indicate You no longer undertake journalistic activities that relate to Our products or Services.

### **Prospective Members**

We will retain Your Personally Identifiable Information for no longer than 6 years after last activity on your Prospective Member CRM record, unless You become a Member of **BonShui** in which case please refer to an Agent Privacy Policy.

### **Suppliers & Prospective Suppliers**

We will retain Your Personally Identifiable Information for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for Personally Identifiable Information, We consider the amount, nature, and sensitivity of the Personally Identifiable Information, the potential risk of harm from unauthorised use or disclosure of Your Personally Identifiable Information, the purposes for which We process Your Personally Identifiable Information and whether We can achieve those purposes through other means, and the applicable legal requirements.

Disaster Recovery Purposes: we may retain data for a further year in archives for disaster recovery purposes.

## **PERSONAL INFORMATION WE RECEIVE FROM THIRD PARTIES**

### **WHAT WE COLLECT AND WHERE IT COMES FROM**

We may receive Personally Identifiable Information about You if You use any of the other websites We operate or the other Services We provide via the App. In this case We will have informed You, when We collected the Personally Identifiable Information, that it may be shared internally and combined with other Personally Identifiable Information collected on Our Platform(s).

### **HomeViews**

Where You have published a review of a development on the HomeViews Platform, this will be shared with Us and published on Our Platform(s) for the development they relate to.

### **Agents**

An Agent may provide Us with Your Personally Identifiable Information such as name, email address, testimonials, reviews, property address, notes on the status of Your enquiry, whether You purchased or rented a property, have requested a valuation of Your property or instructed an Agent to sell or rent Your property.

An Agent may provide to Us property enquiries You have sent to them via other non-BonShuí sources.

### **Credit Reference Agencies**

Where You have consented to a credit check being performed in respect to renting a property from an Agent, the credit reference agency will share the results of the credit check with Us.

### **Subscribers of Our Platform(s)**

Where users enquire about properties/Services on Our Platform(s), plan to take a tenancy with another party, contact Us regarding Our Services or have a query, they may disclose Personally Identifiable Information about other parties involved.

Where Registered Subscribers of Our platforms wish to collaborate on and share their own property lists with You, they will provide Your email address to Us in order that they can collaborate and share the property lists with You. You will receive an email notifying You that the Registered User wishes to collaborate.

### **Human Resources**

When You apply for a job vacancy via a recruitment agency, they will provide Us Personally Identifiable Information about You; or

Where Your job application is successful and prior to an offer of employment, We (either directly or via a third party referencing agency), will request a reference from Your referees. They will provide Us Personally Identifiable Information about You.

### **Journalists**

Where You are a Journalist, We may receive Your Personally Identifiable Information (email address, name, number, company You work for and whether You are a freelancer) from third party press services.

### **Prospective Member:**

Where You are a business, we may source or receive Your Personally Identifiable Information (email address, name, number, company You work for) from:

- ▶ Our subsidiaries;
- ▶ third party services; and
- ▶ publicly available information.

### **Suppliers & Prospective Suppliers**

Where You are a supplier or prospective supplier, we may receive your Personally Identifiable Information from:

- ▶ publicly available information;
- ▶ supplier questionnaires, additional information provided during supplier due diligence and contracts/agreements that Your company have provided to Us; our subsidiaries; and
- ▶ ID and verification providers

### **WHY WE COLLECT IT**

We will use Your Personally Identifiable Information:

- ▶ To allow You to participate in the interactive Services available on Our Platform(s) or to participate in competitions or promotions via Our Platform(s);
- ▶ To pass Your searches and messages on to an Agent to help them communicate with You directly and to provide a more personalised service to You. This may include contacting You about other relevant properties, adding You to their enquiry database for future contact and offering You their additional services, or following up on valuations, however they must form their Own lawful basis for doing so;
- ▶ To allow an Agent to publish testimonials on Our Platform(s) to help showcase their services to Our Subscribers;
- ▶ To allow an Agent to display development reviews published on the HomeViews Platform on Our Platform(s) to showcase their development;
- ▶ To provide Services and information to an Agent which they can use to benchmark their performance;
- ▶ To customise and enrich Your experience on Our Platform(s);
- ▶ To provide the Services;
- ▶ To investigate and respond to queries;
- ▶ To contact You for Your views on Our Services and to notify You occasionally about important changes to Our Terms of Use or this Policy or developments to Our Platform(s) or Services;
- ▶ For Credit Reference Agencies to perform a credit check and share the results with Us, and for an Agent to allow an Agent to assess Your suitability for renting a property.

### **Human Resources**

To process Your job application and consider You for one of Our job vacancies;

### **Journalists**

To send You Press releases that may be relevant to You and correspond with You;

### **Prospective Members**

To add You to Our database of prospects, update our CRM records and contact You by phone, email, video call or otherwise regarding Our Services in a business capacity only; and

### **Agents**

From time to time an Agent may share Your personal data with Us for the purpose of:

- ▶ evaluating their performance and identifying training needs; or
- ▶ providing You supporting evidence for a valuation of Your property where You have invited an Agent to perform a market appraisal;
- ▶ to provide an Agent with a single central place to manage all their property enquiries and to help them facilitate the credit check and referencing process.

### **Suppliers & Prospective Suppliers**

To assess Your suitability as a supplier.

### **OUR LAWFUL BASIS FOR PROCESSING THIS PERSONALLY IDENTIFIABLE INFORMATION**

We have a legitimate interest to process this Personally Identifiable Information. These legitimate interests are:

- ▶ Enhancing the Service that You and Our Subscribers receive on Our Platform(s);
- ▶ Providing a Service to an Agent so they can respond to enquiries or action a call back request;
- ▶ Providing information necessary to enable Us to provide a competitive, cost effective service;
- ▶ To investigate and respond to queries;
- ▶ Providing the Services to Our Subscribers;

### **Job applicants**

Enabling Us to recruit for Our job vacancies in order to provide Our Platform(s) and Services;

### **Journalists**

To respond to Your enquiries and provide timely information and press releases;

### **Prospective Members**

to help maintain accuracy of Our CRM records and to contact You regarding Our Services; and

### **Agents**

To provide an Agent with insights into the effectiveness of BonShuí, to evaluate an Agent's performance and identify any training needs.

To help facilitate an Agent sharing with You supporting evidence for a marketing appraisal.

To provide the Services to an Agent.

To help facilitate an Agent managing their property enquiries, credit checks and referencing process.

### **Suppliers & Prospective suppliers**

To assess Your suitability as a supplier.

We rely on consent to process this Personally Identifiable Information:

### **Credit Reference Agencies**

They will share the results of Your credit check with Us and an Agent in order for the Agent to assess Your suitability for a rental property.

Prospective Members to send You direct marketing.

### **Agents**

To notify an Agent when You access their online valuation or the supporting evidence for the valuation You have requested.

We rely on our legal obligation to process this Personally Identifiable Information:

### **Suppliers & Prospective Suppliers**

In order to fulfil our legal obligations.

### **HOW LONG WE WILL KEEP IT FOR**

We will store this Personally Identifiable Information for two years from the date on which You last used Our Platform(s) or Services at which point it will be erased or anonymised so that the data no longer identifies You;

### **Human Resources**

We retain Personally Identifiable Information for as long as is required to fulfil the purpose (whether that be for the current job application or retaining on file for future job vacancies) or until You notify Us that You wish for Your Personally Identifiable Information to be deleted;

### **Journalists**

We retain Your Personally Identifiable Information until You notify Us that You wish for Your Personally Identifiable Information to be deleted or until Our records indicate You no longer undertake journalistic activities that relate to Our products or Services; and

### **HomeViews**

We will only retain Your reviews for as long as necessary to fulfil the purposes We collected it for. Once the purpose has ended, We will anonymise Your Personally Identifiable Information (so that it can no longer be associated with You) for research or statistical purposes and We may use this information indefinitely without further notice to You.

### **Prospective Members**

We will retain Your Personally Identifiable Information for no longer than 6 years after last activity on your Prospective Member CRM record, unless You become a Member of **BonShuí** in which case please refer to the Agent's Privacy Policy,

### **Agents**

We will retain non-**BonShuí** property enquiries for 2 years from the date an Agent provides them to Us or until an Agent instructs Us to delete them, whichever is sooner.

For all other information an Agent provide to Us, We will only retain Your Personally Identifiable Information for as long as necessary to fulfil the purposes We collected it for. Once the purpose has ended, We will anonymise Your Personally Identifiable Information (so that it can no longer be associated with You) for research or statistical purposes and We may use this information indefinitely without further notice to You.

### **Credit Reference Agencies**

We retain the results of a credit check for 3 years.

### **Suppliers & Potential Suppliers**

We will retain Your Personally Identifiable Information for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for Personally Identifiable Information, We consider the amount, nature, and sensitivity of the Personally Identifiable Information, the potential risk of harm from unauthorised use or disclosure of Your Personally Identifiable Information, the purposes for which We process Your Personally Identifiable Information and whether We can achieve those purposes through other means, and the applicable legal requirements.

### **Disaster Recovery Purposes**

We may retain data for a further year in archives for disaster recovery purposes.

## **PERSONAL INFORMATION WE COLLECT ABOUT YOU**

### **WHAT WE COLLECT AND WHERE IT COMES FROM**

This is different to “*Personally Identifiable Information You give to Us*” because it relates to technical data that We collect. We may:

Collect technical information that has the potential to identify You, including the type of Device You use, a unique identifier (for example, Your Device’s IMEI number), the internet protocol (IP) used to connect Your computer to the internet, the MAC address of the Device’s wireless network interface, or the mobile phone number, Your login by the Device, mobile network information, Your Device operating system, the type of browser You use on Your Device and its time zone setting, the browser plug-in types and versions, operating system and platform; browser type and version and Your login data;

Collect Personally Identifiable Information about Your visit to Our Platform(s) and/ or Your interactions with Our direct marketing and other communications using tracking pixels to identify device types, open rates and click through information, the full Uniform Resource Locators (URL) clickstream to, through and from Our Platform(s) (including date and time), products You viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page and how You use Our Platform(s), products or Services;

Collect details of Your use of Our App or Your visits via the App, the resources that You access and the advertisers and partners that You contact;

Use GPS technology on Your Device to determine Your current location. Some of Our location-enabled services require Your Personally Identifiable Information for the feature to work;

Set a unique publisher provided ID to identify unique users;

Set a unique application number which is contained within the App. When You install or uninstall the App or when the App searches for automatic updates, that number and information about Your installation (for example, and the type of operating system) may be sent to Us; and

Combine technical information with other information that We have about You to help Us with Our processing of Your Personally Identifiable Information as set out in this Policy.

### **WHY WE COLLECT IT**

We will use the information summarised above:

- ▶ To provide Our Platform(s) to You;
- ▶ To customise and enrich Your experience on Our Platform(s);
- ▶ To provide You with GPS enabled functionality;
- ▶ To deliver relevant content and advertisements to You on Our Platform(s) and measure or understand the effectiveness of the advertising We serve to You;
- ▶ To use data analytics to improve Our Platform(s), Services, marketing, customer relationships and experiences;
- ▶ To conduct reviews that assist Us in the improvement and optimisation of Our Platform(s);
- ▶ To identify what versions of the App are being used or when the App is uninstalled from a Device;
- ▶ To ensure that content from Our Platform(s) is presented in the most effective manner for You and for Your device;
- ▶ As part of Our efforts to keep Our Platform(s) safe and secure;
- ▶ To administer Our Platform(s) and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- ▶ Where You interact with broadband quotes to enable Us to identify attributed sales;
- ▶ To respond to and deal with Your queries or complaints and to provide or improve Our customer service to You; and

### **FOR INTERNAL TRAINING PURPOSES:**

#### **OUR LAWFUL BASIS FOR PROCESSING THIS PERSONALLY IDENTIFIABLE INFORMATION**

We have a legitimate interest to process this Personally Identifiable Information. These legitimate interests are:

- ▶ To help ensure the on-going security of the Platform(s);
- ▶ To enhance the service that You receive on the Platform(s);
- ▶ To provide information necessary to enable Us to provide competitive, cost effective Services;
- ▶ To provide customer support including dealing with Your complaints, enquiries and to improve customer service;
- ▶ To monitor quality and conduct staff training;

- ▶ To study how Our Platform(s) are used, including how customers use Our Services, to develop them, to develop and grow Our business, to inform Our marketing strategy, to define types of customers for Our Services and to keep Our Platform(s) updated and relevant, to attribute any sales made for broadband; and
- ▶ To operate Our business and Platform(s) (troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data, provision of administration and IT services, network security and to prevent fraud);
- ▶ If You wish to use a location data service which engages Your Device's GPS tracker, You will be asked to consent to Your Personally Identifiable Information being used for this purpose upon registering to use the App. You can withdraw Your consent at any time by turning off the location services settings for the App on Your Device.

### **HOW LONG WE WILL KEEP IT FOR**

We will store web server logs which contain Personally Identifiable Information about Your activity on Our Platform(s) for 14 days.

Information We receive regarding direct marketing and other communications will be retained for no longer than 2 years.

We will store some audit trails for Our Platform(s) for up to 1 year which can include Your Personally Identifiable Information such as user ID and email address.

We will store all other Personally Identifiable Information for two years in order to allow Us to review and monitor normal traffic patterns and trends on Our Platform(s) at which point it will be erased or anonymised so that the data no longer identifies You. We will store the unique application number for as long as the App is installed.

We retain logs for Right to be Forgotten (RTBF) requests for up to 180 days after the RTBF has been actioned which can include name and/or email address.

We may retain data for a further year in archives for disaster recovery purposes.

### **General**

From time to time, We may contact You by email or telephone to collect Your opinions and feedback on Our Services.

### **WHY WE COLLECT IT**

#### *Tenant and Guarantor:*

- ▶ We use Your Personally Identifiable Information to conduct a reference check;
- ▶ We will use this to send You a SMS and/or email asking You to complete an application form, which We require in order to conduct a tenant reference check for You. We may also call You on Your mobile number if We do not hear from You;
- ▶ To contact You regarding Your application and respond to any queries You may have;

- ▶ To obtain a tenant reference. This includes conducting (Ourselves or via a third party, as explained in this Policy) credit checks, affordability checks, verifying the Personally Identifiable Information that has been provided to Us, fraud/ money laundering checks, ID checks and confirming Your right to rent in the UK;
- ▶ We will share Your Personally Identifiable Information with third parties for the purposes of conducting a tenant reference. This may include with employers, accountants, pension providers, credit reference agencies, identity service providers and landlords. These third parties will then be asked to provide a reference , or data to support a reference, in respect of You to Us. Once We have completed the tenant referencing process, We will provide Your landlord or managing agent with the Referencing Data and results of the tenant reference;
- ▶ We will process Your Personally Identifiable Information to provide an instant credit history for the landlord/managing agent. This will involve sharing Personally Identifiable Information with Equifax for the purpose of a soft credit check which will be used by Us in providing an instant credit history. Once We have completed the instant credit history process, We will provide Your landlord or managing agent with the results;
- ▶ We will process Your Personally Identifiable Information to conduct an identification and verification check, including whether You appear on a sanctions or politically exposed persons list as required by law. This will involve sharing Personally Identifiable Information with our third party identity service providers for the purpose of conducting the checks. We will provide Your landlord or managing agent with the results;
- ▶ We will provide You the option to share Your transactional history through Open Banking to support Your tenant reference;
- ▶ If the tenant reference is positive, We may contact You (as a tenant) about contents and/or liability insurance, utilities and broadband products that may be of interest to You via text, email and/or telephone. We will not contact guarantors for marketing purposes.
- ▶ If You decide to take out insurance products with Us, We will need to use this Personally Identifiable Information to process Your application and, if successful, put the insurance in place. This may involve Us sharing Your Personally Identifiable Information with applicable underwriters and insurance providers to put the insurance in place;
- ▶ If You take out insurance with Us, to notify You of changes to the insurance product and/or terms;
- ▶ To manage Our relationship with You where You take out insurance products:
- ▶ To manage payments, fees and charges;
- ▶ To manage Your insurance policy;
- ▶ To collect and recover monies owed;
- ▶ To assist with any claims including payment of any insurance claims;
- ▶ To contact You regarding renewal of Your policy;
- ▶ If You fail to pay Your rent or comply with the tenancy agreement whether or not We provide insurance services to an Agent or landlord (such as rent protection), We may need to process the Referencing Data. We will process this Personally Identifiable Information to:
- ▶ Take steps to enforce the tenancy agreement against You;

- ▶ Collect payment due by You (including instructing debt collection agencies or bailiffs);
- ▶ Obtain Your whereabouts (including instructing tracing agencies);
- ▶ Pursue a claim against You;
- ▶ Provide an Agent with the property address of their rental properties where a Rent Guarantee policy has been purchased from Us;
- ▶ When You choose to run a quote for additional Services We offer such as utilities, insurance etc., We will share Your Personally Identifiable Information with **BonShui Limited** in order to pre-populate Your quote and personalise Your experience;
- ▶ Where You choose to use Our Platform(s) to generate a quote or purchase an insurance policy or utility, We will pass Your details to the Member in order they can process Your application/ quote;
- ▶ We may need to share Your Referencing Data with the managing agents, insurance providers, underwriters, legal advisors, bailiffs, debt collection agencies and other third parties in furtherance of collecting payments by You, enforcing the tenancy agreement or pursuing any claim against You. This may also include sharing Your Referencing Data with the other party to the claim, witnesses, experts, solicitors and claim handlers;
- ▶ To understand where You are in Your journey so We can provide assistance with Your application; and
- ▶ We may share the Personally Identifiable Information You provide Us (name of tenants, rental property address, email address, telephone number, tenancy start date and length of tenancy) with One Utility Bill Limited where an Agent has instructed Us to do so. This will be for the purpose of administering utilities and council tax billing at the rental property for Your tenancy.
- ▶ Where You enquire about insurance or purchase insurance, We collect data on vulnerabilities in order to support You and improve Our Services to You.
- ▶ In order to provide a follow up reminder email regarding Your insurance quote or partial completion of the quote form.

### **Landlord**

Where a tenant reference is being conducted on a tenant that is looking to rent Your property, We may use Your Personally Identifiable Information to:

- ▶ Send You an email with a summary of the referencing results for You to approve (where an Agent has this functionality switched on);
- ▶ To conduct identify and verification checks including whether you feature on a politically exposed persons or sanctions list via our third-party identity service providers where required to do so to comply with our legal obligations.
- ▶ Contact You via telephone regarding insurance products that may be relevant to You; and
- ▶ Where We have obtained consent, contact You via email or SMS to provide quotes for insurance products that may be relevant to You.
- ▶ Where You choose to purchase an insurance policy, We may pass Your details to an who manages Your rental property so they can maintain records of who has a policy in place.
- ▶ Where You enquire about insurance or purchase insurance, We collect data on vulnerabilities in order to support You and improve Our Services to You.

- ▶ In order to provide a follow up reminder email regarding Your insurance quote or partial completion of the quote form.

### Referees

- ▶ We will use Your Personally Identifiable Information to contact You to request a reference on behalf of a tenant (the reference You provide will be used to support their Tenant Reference check);
- ▶ The reference You provide together with Your contact details:
  - ▶ Will be shared with an Agent and may be shared with the landlord of the property to provide supporting evidence on a tenant's suitability to rent a property and for the purpose of performing their own reference checks on the prospective tenant and verifying the reference. Please note an Agent (who is also a Data Controller of this information) may share this information with other parties (e.g. the tenant or guarantor), however they must form their own valid lawful basis for doing so and in compliance with their obligations under the Data Protection Act; and
  - ▶ Will only be shared by Us with the tenant where We are legally required to do so.

### General

- ▶ To contact You by email or telephone for market research purposes and to obtain feedback on Our Services in order to help Us improve our Services, processes and offerings.

## OUR LAWFUL BASIS FOR PROCESSING THIS PERSONALLY IDENTIFIABLE INFORMATION

### Tenant & Guarantor:

We have a legitimate interest to process this Personally Identifiable Information. These legitimate interests are:

- ▶ To carry out tenant referencing services and perform Services for an Agent;
- ▶ To provide an instant credit history / service to managing agents or landlords;
- ▶ To recover payments due or to make payments;
- ▶ To provide customer support including dealing with Your complaints, enquiries and to improve customer service, monitor quality and conduct training;
- ▶ To protect managing agents / landlords by enforcing tenancy agreements and collecting debts and part of the insurance process;
- ▶ To provide You access to insurance and tenant related services which may be relevant to You. Contact may be via email, text, telephone or otherwise;
- ▶ To assist You with generating a quote for insurance, utilities and tenant related services;
- ▶ To assist with administering utilities and council tax billing at the rental property for Your tenancy;
- ▶ To provide a follow up reminder email regarding Your insurance quote or partial completion of the quote form; and
- ▶ Where You apply and /or take an insurance policy with Us it is necessary for us to process criminal offence data to provide You the service. In this instance we rely on 'insurance' as our condition of processing criminal offence data, rather than consent.

- ▶ In some instances We may rely on Consent to process Your Personally Identifiable Information:
- ▶ If the tenant reference is positive, We may send You direct marketing about insurance products that may be of interest to You via SMS or email;
- ▶ To process transactional data from open banking to support Your tenant reference;
- ▶ If You decide to take out insurance products with Us, We will need to use this Personally Identifiable Information to process Your application and, if successful, put the insurance in place. This may involve Us sharing Your Personally Identifiable Information with applicable underwriters and insurance providers to put the insurance in place;
- ▶ If You wish to learn more about utility bills, with Your consent We will share Your Personally Identifiable Information with One Utility Bill Limited in order that they can contact You about utility bills.
- ▶ If You wish to learn more about products and services that may be of interest to You from Partners We work with, with Your consent We will pass Your details onto those Partners You have consented to.
- ▶ To process special category (such as benefits received which may reveal sensitive data) and criminal offence data as part of Your application;
- ▶ To record vulnerabilities You disclose to Us when enquiring or purchasing insurance and to share those with the insurer where a sale is made.
- ▶ Where necessary to comply with a legal obligation:
- ▶ When We are performing identity/ fraud/money laundering/politically exposed persons or sanction checks;
- ▶ Notifying You of changes to the insurance products or terms; and
- ▶ Performance of a contract with You or an Agent.

### **Landlord**

We have a legitimate interest to process this Personally Identifiable Information. These legitimate interests are:

- ▶ To provide You with a summary of the referencing results for You to approve (where an Agent has this functionality switched on);
- ▶ To carry out tenant referencing services and perform services for an Agent;
- ▶ To provide You access to insurance and tenant related services which may be relevant to You. Contact may be via email, text, telephone or otherwise;
- ▶ To provide You access to insurance products which may be relevant to You (contact may be via text, telephone or otherwise);
- ▶ To assist You with generating a quote for insurance where requested by You;
- ▶ In some instances We may rely on Consent to process Your Personally Identifiable Information:
- ▶ If You decide to take out insurance products with Us, We will need to use this Personally Identifiable Information to process Your application and, if successful, put the insurance in place (which may involve Us sharing Your Personally Identifiable Information with applicable underwriters and insurance providers); and

- ▶ To process special category and criminal offence data as part of Your application.
- ▶ To record vulnerabilities You disclose to Us when enquiring or purchasing insurance and to share those with the insurer where a sale is made.
- ▶ Where necessary to comply with a legal obligation:
- ▶ When We are performing identity/fraud/money laundering/politically exposed persons or sanction checks.

### **Referees**

We have a legitimate interest to process this Personally Identifiable Information. These legitimate interests are:

- ▶ To carry out a tenant reference and provide Services for an Agent; and
- ▶ To contact You to request a reference on a tenant which provides supporting evidence on a tenant's suitability to rent a property.
- ▶ To allow an Agent to perform their own reference checks on the prospective tenant and verify the reference.

### **General**

We have a legitimate interest to process Your Personally Identifiable Information in order to help improve Our Services, processes and offerings.

### **HOW LONG WE WILL KEEP IT FOR**

#### **Tenants, Guarantors, Landlords & Referees**

We will only retain Your Personally Identifiable Information for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for Personally Identifiable Information, We consider the amount, nature, and sensitivity of the Personally Identifiable Information, the potential risk of harm from unauthorised use or disclosure of Your Personally Identifiable Information, the purposes for which We process Your Personally Identifiable Information and whether We can achieve those purposes through other means, and the applicable legal requirements;

We have to keep basic Personally Identifiable Information about You (including Your contact, identity, financial and transactional data) for 3 years after You cease being a customer or after completion of the tenant reference check, whichever occurs last, for tax purposes;

All Personally Identifiable Information will be destroyed after 3 years to ensure compliance with any regulatory authority; and

In some circumstances We may anonymise Your Personally Identifiable Information (so that it can no longer be associated with You) for research or statistical purposes in which case We may use this information indefinitely without further notice to You.

We may retain data for a further year in archives for disaster recovery purposes.

## FINANCIAL SERVICES

### WHAT WE COLLECT AND WHERE IT COMES FROM

In the course of providing Our Services We collect Personally Identifiable Information when You apply for a mortgage in principle via Our Platform(s).

When You start Your application, You provide Us the following Information about Yourself and other applicants (who are party to the mortgage in principle and have agreed to You submitting their Personally Identifiable Information to Us):

- ▶ Contact and identity data: Full names (including any previous known names), date of birth, gender, country of birth and nationality;
- ▶ Applicant data: Number of people applying;
- ▶ Employment data: Employment status, job title, job role, industry, contract type, length of employment, self employed details where relevant (sole trader, freelancer, partner director with 20% share or less, director with more than 20% share, length of self-employment, if a subcontractor whether Your contract is likely to be renewed and remaining length on Your contract) , whether You are an employee for tax purposes, whether You are permanent employee, temporary or are a fixed term contractor, annual income and additional earnings (includes commission, overtime and bonuses), second job information, planned retirement age and years ;
- ▶ Financial data: Mortgages held, how You will be financing Your property purchase, property price/value, deposit details (amount and source of money), mortgage term, state benefits You receive, credit cards and store cards, loans (buy now pay later, personal loans, finance such as hire purchase and personal contract payment), whether You have been declared bankrupt or entered into a voluntary agreement in the last 6 years, retirement income, income from other sources (maintenance, pension, investments, rent) regular outgoings, whether Your income is likely to drop in the next 2 years and by how much and whether your regular outgoings are likely to increase in the next 2 years and by how much);
- ▶ Property data: Property ownership, secondary or primary residence, ownership status of Your current address, property addresses from last 3 years and whether You have an armed forces postal address, type of property being purchased;
- ▶ Lifestyle data: Whether You have any dependants, age of dependants and Your personal spending;
- ▶ Your consent to share special category data with an Agent lender or broker; and
- ▶ What stage of the home-moving process You are and whether You are a first time buyer, re-mortgaging, investing, selling etc.;
- ▶ an Agent lender will provide Us their decision on Your mortgage in principle (including any reason for decline) and a unique reference number;
- ▶ an Agent mortgage broker will provide Us a status update on Your contact with them (e.g. whether they contacted You, whether a mortgage in principle was completed, any offers received, whether any mortgage protection quotes or policies were taken, etc).

We also collect data as detailed above in the *“Personally Identifiable Information We collect about You”*

- ▶ Where either You identify Yourself (or We identify You) as vulnerable in the course of corresponding with Us, We will record the category of vulnerability in Our ticketing system in order to meet Our legal obligations.

- ▶ Where You apply for a Mortgage in Principle for a specific property currently being advertised on Our Platform(s), We will populate Your MIP application with data of the property You have selected.

## **WHY WE COLLECT IT**

We will use the information summarised above:

- ▶ To process Your application for a mortgage in principle;
- ▶ To send You an email with Your mortgage in principle status;
- ▶ To notify You by email when Your mortgage in principle decision is about to expire;
- ▶ To contact You about Your mortgage in principle decision and next steps;
- ▶ To customise Your experience on Our Platform(s) (please see Our “Profiling” section below for more information);
- ▶ We will share Your Personally Identifiable Information with Our Partner mortgage lender to conduct a mortgage in principle (please see Nationwide Privacy Policy for more information on how they handle and process Your Personally Identifiable Information which includes automated decision making);
- ▶ Where You have requested, We will provide an Agent mortgage brokers with Your information (via Our third party integration partner), including reason for a mortgage in principle decline from Our Partner mortgage lender (where applicable), in order they can contact You to respond to your enquiry, provide assistance on next steps and explore options with other lenders;
- ▶ For our internal analysis and to help improve our commercial proposition.

We will process Your Personally Identifiable Information to provide You a mortgage in principle decision. Our Partner mortgage lender(s) may:

- ▶ Share Your Personally Identifiable Information with third parties (such as credit reference agencies) to run a soft credit check to help assess and determine whether to offer You a mortgage in principle (please see Nationwide Privacy Policy for more information on how they handle and process Your Personally Identifiable Information);
- ▶ Use automated decision making to assess whether they can offer You a mortgage in principle. This is based on the Personally Identifiable Information You have provided together with information obtained from third parties as detailed above (please see Nationwide Privacy Policy for more information); and
- ▶ To comply with impacting regulation and fulfil any legal obligations.

## **OUR LAWFUL BASIS FOR PROCESSING THIS PERSONALLY IDENTIFIABLE INFORMATION**

We have a legitimate interest to process this Personally Identifiable Information to:

- ▶ Provide You with a mortgage in principle decision in order to help simplify the home moving process;
- ▶ Keep You updated on the status of Your mortgage in principle decision;
- ▶ Provide assistance on next steps;
- ▶ We rely on Consent to process Your Personally Identifiable Information which is special category data;
- ▶ We rely on consent to share Your personal information (including reason for a mortgage in principle decline from Our Partner mortgage lender) with an Agent mortgage broker.

- ▶ Performance of a contract with Our Partner mortgage lender and Member mortgage broker; and
- ▶ We have a legal obligation to process Your Personal information to achieve compliance.

## **HOW LONG WE WILL KEEP IT FOR**

We will retain Your Personally Identifiable Information for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for Personally Identifiable Information, We consider the amount, nature, and sensitivity of the Personally Identifiable Information, the potential risk of harm from unauthorised use or disclosure of Your Personally Identifiable Information, the purposes for which We process Your Personally Identifiable Information and whether We can achieve those purposes through other means, and the applicable legal requirements;

We will retain email address, full name, loan size, property value, mortgage in principle end reference number and the result of the mortgage in principle decision (including reason for any declined application) for up to 6 years, after which it will be deleted or anonymised;

Where You have used an Agent mortgage broker, We will also retain Personally Identifiable Information (such as loan size, term, property value, purchase stage, borrower type and status of the enquiry You sent) for 6 years.

Where We provide You the option to save Your application, We will retain Your application data for up to 90 days from the date You last changed Your application, after which it will be deleted. If You do not save Your application, We retain the following Personally Identifiable Information for no longer than Your session on Our Platform(s) (i.e. the period of time You are active on Our Platform(s)) unless We anonymise it, have specified otherwise or there has been no activity during Your session for 35 minutes, in which case We will delete the following data:

Special category data collected for the purpose of providing a mortgage in principle decision;

any Personally Identifiable Information We collect which is purely for the purpose of the mortgage in principle; and

Where We anonymise Your Personally Identifiable Information (so that it can no longer be associated with You) for the purposes of regulatory reporting, monitoring key performance indicators, gaining market insights or for research or statistical purposes then We may use this information indefinitely without further notice to You.

The accept mortgage in principle certificate will be saved for 90 days from the date of the result being provided.

## **PROFILING**

We may from time to time profile Your activity when using Our Services or Our Platform(s).

This profiling is based on telephone and email enquiries You send to an Agent, properties advertised on Our Platform(s), cookies, Your activity on Our Site, information You either provide Us or We collect in the course of using Our Platform(s) and Services (such as living situation, property ownership and what Services You utilise on Our Site etc.). We may use this information both now and, in the future, to identify or indicate:

- ▶ any properties You may have for sale or let;



- ▶ whether You are intending to sell or let Your property;
- ▶ if You have subsequently instructed one of an Agent to advertise Your property;
- ▶ whether Your property is being advertised on BonShui and its property status;
- ▶ what stage in the home moving process You are;
- ▶ whether You have a mortgage in principle decision;
- ▶ whether You are a first time buyer, first time renter, re-mortgaging, investing, a seller, tenant, a landlord etc.;
- ▶ if You may require a valuation of Your property;
- ▶ whether You have been through Our tenant referencing.
- ▶ actions You have taken on Our Sites; and
- ▶ whether You are likely to require any of Our Services.
- ▶ It takes place to help Us and an Agent:
  - ▶ understand what sort of properties You may be interested in;
  - ▶ identify opportunities to improve training;
  - ▶ match enquiries sent to an Agent with properties advertised on Our Platform(s). This is to provide an Agent with market insights where Your property was subsequently advertised with another Member. This will be provided for training purposes only to help an Agent improve their processes for identifying where enquiries may have a property for sale or rent, either now or in the future;
  - ▶ to help an Agent identify opportunities within their enquiries, to categorise Your activity (such as usage of Our Site, whether you have a property for sale or rent, the advertising status of Your property and subsequent changes) to help determine how likely You are to require services from an Agent. Members may then contact You to offer their services, although they can only do so if they have a lawful reason to do so (known as a lawful basis of processing Your Personally Identifiable Information);
  - ▶ identify whether You are a Landlord so an Agent can manage Your enquiry more effectively.
  - ▶ to customise Your experience on Our Platform(s) such as:
    - ▶ suggest properties that may be of interest to You;
    - ▶ suggest Our mortgages, valuations, insurance and referencing Services to You;
    - ▶ suggesting services from Our third party advertisers that may be relevant and of interest to You based on Your use of Our Platform(s); and
    - ▶ send You customised emails about Our Services based on Your use of Our Sites and Your stage in the home moving process.

You can always object to Our profiling by emailing Us here [dpo@bonshui.ai](mailto:dpo@bonshui.ai). Any profiling data that We hold about You will only be kept for as long as is required to perform the Services to an Agent and provide Our Platform(s) and Services to You.

## USE OF AI

We make use of AI, machine learning, and other similar technologies (“AI”) to improve Our site, services, internal operations and communications. We do not use AI to make any automated decisions which can have a legal or similar effect on You.

Examples of how We use AI include:

- ▶ Helping Us better understand Your needs in order to provide You a more customised and relevant experience on **BonShui**.
- ▶ To help identify Broadband deals based on Your requirements You tell Us when You use the Broadband tools on Our Platform(s).
- ▶ To tailor Our marketing communications with You.
- ▶ To assist with responding to enquiries You may have with Us and improve Our communications with You.
- ▶ Sharing of personal information between **BonShui** and its subsidiaries.

Personally Identifiable Information You provide Us may be shared between Our subsidiaries in order to:

- ▶ provide Our Platform(s) and Services to You;
- ▶ improve Our Platform(s) and Services; and
- ▶ customise Your experience on Our Platform(s).

## USE OF YOUR PERSONAL INFORMATION FOR DIRECT MARKETING AND OTHER COMMUNICATIONS

### DIRECT MARKETING

Where You have consented, We may Use Your Personally Identifiable Information to provide direct marketing messages to You; either directly from Us or on behalf of an Agent or Partners. We will customise Our communications with You based on Your use of Our Platform(s). You can opt out of direct marketing at any time from **BonShui Limited** by:

- ▶ Using the unsubscribe links located at the bottom of the direct marketing emails We send You. Please ensure You click through to manage Your full marketing preferences;
- ▶ Logging into Your My **BonShui** account to manage your marketing preferences; or
- ▶ Contacting Us directly from our website or by sending an email to [say.hello@bonshui.ai](mailto:say.hello@bonshui.ai).

It may take up to seventy-two hours from the time You receive confirmation from Us that Your preferences are being updated to Us unsubscribing You from Our direct marketing.

The types of things that We may do include:

- ▶ Providing direct marketing advertisements and communications to You via email, text, post or telephone;
- ▶ Making suggestions and recommendations to You and other Subscribers of Our Platform(s) and Our Services about goods or Services that may interest You or them;

- ▶ Tailor Our communications to You based on Your activity on Our Sites.
- ▶ Communicating with You on third party social media platforms;
- ▶ Monitoring the effectiveness of Our direct marketing communications and Your responses to it which can help Us improve Our Services and communications;
- ▶ Using a clear image GIF to track results of an email campaign such as the device You use. You can turn this off for future emails by turning off images in the email itself;
- ▶ Using tracking pixels in Our direct marketing communications which measure open rates, interactions with Our campaigns, identifies device and operating system You use. We use tracking pixels for our own legitimate interests in order that We can analyse Our campaigns as well as to improve and tailor Our communications with You;
- ▶ Where Your tenant reference is successful We may use Your Personally Identifiable Information to contact You via text, email and/or telephone to inform You about insurance, utilities, broadband or other tenant related services (We obtain Your consent to send direct marketing to You for this processing as part of the tenant reference application form); and
- ▶ We will retain Your marketing preferences to ensure We comply with Your instructions.

You can request the list of an Agent from whom We send marketing by contacting Our Data Protection Officer.

You can always make use of Our Platform(s) and Services without having to agree to direct marketing.

From time to time, We may review Our marketing consent wording and ensure it remains compatible with the intended purpose. We will notify You of any material changes and give You the opportunity to manage Your marketing preferences.

## **OTHER COMMUNICATIONS**

When You opt out of receiving direct marketing from Us, You will still continue to receive transactional messages from Us regarding Our Platform(s) and Services. We have a legitimate interest to send You these communications, examples of which include:

- ▶ Important updates to Our Services, Privacy Policy and Platform(s);
- ▶ Managing Your My **BonShui** account;
- ▶ For security reasons;
- ▶ To contact You about Your mortgage in principle decision;
- ▶ Receiving Property Alerts and/or Tracked Property Alerts where You have set them up in Your My **BonShui** Account (You can amend your Property Alerts and/or Tracked Property Alerts at any time in Your My **BonShui** account);
- ▶ To contact You for market research purposes;
- ▶ Where a home hunter shares a property with You via Our Platform(s);
- ▶ Where You have successfully completed a tenant reference, to contact You about insurance and tenant related services, please refer to Our “Tenant and Guarantor Referencing” table above for more information;

- ▶ Where You have started or completed a quote for Home Contents and Liability Insurance, We will send You an email reminding You of the quote or to complete the quote; and
- ▶ Where Personally Identifiable Information is provided to Us where You operate as a business and it has been sourced from publicly available information, We may contact You about Our Services in a business capacity only.

We use tracking pixels in Our email communications to You which captures whether You opened an email, device and operating system, and what parts of the email you engaged with. We rely on legitimate interests to collect and process this information in order to improve and customise Our communications with You.

### **PHOTOS, IMAGES AND VIDEOS OF YOU**

Where You have agreed to participate and feature in videos, images and photos for Us, these will be used for the purpose outlined to You at the time, which can include to promote **BonShui** or its subsidiaries. This will be retained for no more than three (3) years after the purpose has ended.

We have a legitimate interest to use these on any of Our Platform(s) or 3<sup>rd</sup> party social media platforms.

### **REMOVING PROPERTY DATA FROM OUR PLATFORMS**

If You have any concerns about the properties advertised on the Platform(s), please contact Us at [data.quality@bonshui.ai](mailto:data.quality@bonshui.ai) and We will endeavour to resolve the issue promptly.

If You are a vendor or landlord of a property that is being actively marketed on Our Platform(s) and You want this removed, please contact Your estate agent or lettings agent directly in the first instance.

If You have concerns about historical property information about a property featured on Our Platform(s) and You can prove to Us that You have a valid association to that property, please contact Us at [sold.prices@bonshui.ai](mailto:sold.prices@bonshui.ai).

### **WHO HAS ACCESS TO YOUR PERSONAL INFORMATION?**

We retain access to all Personally Identifiable Information that We have collected from You or about You. Once Your Personally Identifiable Information has been passed to one of an Agent in the course of providing Our Services (most typically when You communicate with an estate agent through Our Platform(s)) then an Agent will have a copy of the Personally Identifiable Information that You have provided within Your enquiry and Your contact details which they will use to get in touch with You.

Property data, it is provided to Us by an Agent (or third parties that act on their behalf). an Agent (or any third party that acts on their behalf) will be responsible for Personally Identifiable Information in their possession and that Personally Identifiable Information will be subject to any privacy terms or policies that the Member has in place. We are not responsible for use (or misuse) of Your Personally Identifiable Information by any of an Agent.

When Our Services are available via the websites of Our partners or Members, those partners or Members may have access to Your Personally Identifiable Information. We may also have links to other third party websites from Our Platform(s). Clicking on those links or enabling those connections may allow third parties to collect or share Personally Identifiable Information about You. We are not responsible for the content, security, privacy policies and practices of any other third party websites, even if You access them using links from Our Platform(s) or if You can access Our Platform(s) or use Our Services from them. We recommend that You check the policy of each website that You visit and make sure that You are comfortable with the terms of such policies before You visit them or provide any Personally Identifiable Information to them.

If Our business is sold or merged, or if We sell or buy any business or assets, We may disclose Your Personally Identifiable Information to the prospective seller or buyer of such business or assets. We will make sure that any such transfer is done in a secure way.

If We offer or supply a Service to You that is provided on Our behalf by a third party, We may have to pass Your Personally Identifiable Information to them in order to deliver the service. The categories of third parties (who are acting as Data Processors which means they are responsible for processing Personally Identifiable Information on behalf of Us) include:

- ▶ Telephony providers (including call recording);
- ▶ Our support ticketing systems;
- ▶ SMS providers;
- ▶ E-calendar providers;
- ▶ E-signatory providers;
- ▶ Payment providers;
- ▶ Translation and transcription providers;
- ▶ Market research agencies;
- ▶ Call transcription providers;
- ▶ IT providers who provide systems to Us for the purposes of hosting and supporting Our Platform(s) and updates to an Agent such as delivering property and valuation enquiries to an Agent; and
- ▶ Marketing agencies and systems that allow Us to send marketing communications to You and to make sure the marketing communications are relevant.

We may also use third parties to provide Services on Our behalf which may include processing (but not using themselves) Your Personally Identifiable Information; for example, to complete partial addresses or to augment the Personally Identifiable Information We hold about You. In either case, We will not pass Your Personally Identifiable Information to anyone who is not also subject to adequate privacy commitments in Our contract with them.

Where You are undergoing tenant referencing, obtaining a quote for or purchasing tenant and insurance related services We have to share Your Personally Identifiable Information with the following external parties set out below for the purposes set out in Our “*Tenant & Guarantor Referencing*” table above, with (*inter alia*):

- ▶ Credit reference agencies for the purpose of checking that the details You have provided Us are correct and to obtain further details (as set out above);

- ▶ Payment providers to set up a direct debit and/or take payment from You;
- ▶ Insurance brokers, providers and underwriters for the purpose of arranging insurance policies;
- ▶ Debt collection agencies, tracing companies, bailiffs and legal advisors in order to recover monies due from You, to trace Your whereabouts or in pursuit of a claim against You; and
- ▶ Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

We may be required to share Your Personally Identifiable Information with the following external parties:

- ▶ HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances;
- ▶ Police or other such regulatory authority as part of an investigation or otherwise for legal or regulatory purposes;
- ▶ Competent authorities as part of an investigation they may be conducting and where there is a valid lawful basis to do so.
- ▶ Dispute Resolution agencies for the purposes of dealing with any complaints;
- ▶ UK law enforcement agencies and third party security companies for the purposes of ensuring that We comply with the law and have adequate security measures in place;
- ▶ We will disclose Your Personally Identifiable Information to other third parties if We are under a duty to disclose or share Your Personally Identifiable Information in order to comply with any legal or regulatory obligation or request. This includes exchanging Personally Identifiable Information with other companies for the purposes of fraud prevention and credit risk reduction; and
- ▶ Personally Identifiable Information You have provided to **BonShui** either directly or via Our Partners or Members, may be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering. If fraud is detected, You could be refused certain services, finance or employment. For further details of how Your information will be used by **BonShui** and these fraud prevention agencies, and Your data protection rights can be found by visiting <https://www.cifas.org.uk/fpn> .

We require all Our third party service providers to respect the security of Your Personally Identifiable Information and to treat it in accordance with the law. We do not allow Our third party service providers to use Your Personally Identifiable Information for their own purposes and only permit them to process Your Personally Identifiable Information for specified purposes and in accordance with Our instructions.

You can request a list of Our third party partners and affiliates by contacting Our Data Protection Officer.

#### **WHERE DO WE STORE YOUR PERSONAL INFORMATION?**

The Personally Identifiable Information that We collect from You may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for Us or for one of Our suppliers or contractors. Territories outside of the EEA may not have equivalent legal protections to those that apply within the EEA, but We are under a duty to make sure that Our suppliers and contractors located outside of the EEA continue to take all steps reasonably necessary to ensure that Your Personally Identifiable Information is treated securely and in accordance with this Policy.

We will use Standard Contractual Clauses and/or the UK-US Data Bridge for transfers to the United States of America. By submitting Your Personally Identifiable Information to Us, You agree to this transfer, storing or processing.

Unfortunately, the transmission of Personally Identifiable Information via the internet is not completely secure. Although We will do Our best to protect Your Personally Identifiable Information, We cannot guarantee the security of Your Personally Identifiable Information transmitted to Our Platform(s); any transmission is at Your own risk. Once We have received Your Personally Identifiable Information, We will use strict procedures and security features to try to prevent unauthorised access.

We follow strict security procedures to ensure that Your Personally Identifiable Information is not damaged, destroyed or disclosed to a third party without Your permission and to prevent unauthorised access to it. The servers and cloud based technology that store the Personally Identifiable Information are kept in a secure facility with restricted physical access and We use secure firewalls and other measures to restrict electronic access. If We are working with third parties, We will require them to have in place similar measures to protect Your Personally Identifiable Information.

Only employees who need access to Your Personally Identifiable Information to perform a specific job are granted access to personally identifiable Personally Identifiable Information. In addition, We limit access to Your Personally Identifiable Information to those agents, contractors and other third parties who have a business need to know. They will only process Your Personally Identifiable Information on Our instructions and they are subject to a duty of confidentiality.

We may require You to co-operate with Our security checks and provide identification before We disclose Personally Identifiable Information to You. If You are a registered User, You can update the Personally Identifiable Information held in Your My BonShui account (that You give Us) at any time by viewing Your My BonShui page.

Where We have given You (or where You have chosen) a password which enables You to access certain parts of the Platform(s), You are responsible for ensuring Your password is unique and for keeping this password confidential. We ask You not to share Your password with anyone.

We have procedures in place to deal with any suspected Personally Identifiable Information breach and will notify You and any applicable regulator of a breach where We are legally required to do so.

We recommend You do not use public or shared devices where You are providing Your Personal Data to Us (such as mortgage in principle applications, sending enquiries about properties, requesting a quote etc) and take appropriate steps to ensure You have removed any local storage or session-based data from your shared/public Device.

## **YOUR RIGHTS**

You have the right to ask Us not to process Your Personally Identifiable Information at any time.

You have the right to use Our Platform(s) without consenting to direct marketing and the communication services that We provide. We will inform You (before collecting Your Personally Identifiable Information) if We intend to Use Your Personally Identifiable Information for such purposes or if We intend to disclose Your Personally Identifiable Information to any third party for such purposes.

We always use the most recently submitted form to be Your current consent status. If You are a registered User, but not signed in when You submit a form, We will not be able to Use Your saved settings so will deem Your consent choice to be as per the form You submit at the time. You can exercise Your right to prevent such processing by selecting the specific options in the fields or forms when You become a registered User.

You also have a right to:

- ▶ Request access to or rectification of the Personally Identifiable Information which We hold about You;
- ▶ Request erasure of Your Personally Identifiable Information in certain circumstances;
- ▶ Restrict the processing of Your Personally Identifiable Information;
- ▶ Receive Your Personally Identifiable Information that You have provided to Us;
- ▶ Object to or restrict Our processing of Your Personally Identifiable Information in certain circumstances; and
- ▶ Request that We transmit Your Personally Identifiable Information to another data controller.

Where We process Your Personally Identifiable Information because You have given Us Your consent to do so, You have the right to withdraw Your consent at any time.

Where We process Your Personally Identifiable Information under legitimate interests, if You object to processing, this will not affect any processing which has already taken place. In some limited instances, objecting to processing of all Your Personally Identifiable Information may mean You are not able to use some of Our Services or Platform(s).

To exercise any of these rights, please contact the Data Protection Officer whose contact details are provided earlier in this Policy. We will need to request specific information and identification documents (such as passport, driver's license, title deeds etc.) from You to help Us confirm Your identity. This is a security measure to ensure that Personally Identifiable Information is not disclosed to any person who has no right to receive it and to ensure we are only acting on the instructions of the data subject. We will delete this ID within 7 days receiving it. We may also contact You to ask You for further information in relation to Your request to speed up Our response.

We try to respond to all legitimate requests within one month. Occasionally it may take Us longer than a month if Your request is particularly complex or You have made a number of requests. In this case, We will notify You and keep You updated.

As part of Our Data Protection obligations and to help Us improve Our Service, We maintain a register of Data Subject Right Requests which contains limited Personally Identifiable Information (email address, type of request, reason for request, resolution, reference number, application number etc.). These records are only available to Our Data Protection Team or those with a need to know and would only be made available to the Information Commissioner's Office upon request. We will retain these records for up to 6 years from the conclusion of the Data Subject Right Request, after which any Personally Identifiable Information will be anonymised.

You have the right to complain to the Information Commissioner's Office if You feel unhappy with the way We process Your Personally Identifiable Information. Please visit [www.ico.org.uk](http://www.ico.org.uk) for more information.

## HOW TO REPORT A SUSPECTED BREACH OF PERSONALLY IDENTIFIABLE INFORMATION

We take the security and privacy of Your Personally Identifiable Information seriously and have implemented appropriate technological and organisational measures to protect your Personally Identifiable Information. If you suspect Your Personally Identifiable Information may have been breached, misused, or are concerned about the security of Your Personally Identifiable Information please contact us on [dpo@bonshui.ai](mailto:dpo@bonshui.ai).

## YOUR DUTY TO INFORM US OF CHANGES

It is important that the Personally Identifiable Information We hold about You is accurate and current. Please keep Us informed if Your Personally Identifiable Information changes during Your relationship with Us.

## COOKIES & TRACKING

Like many website and App providers, We use “cookies” to enable Us to personalise Your visits to Our Platform(s), simplify the signing-in procedure, keep track of Your preferences and to track the usage of Our Platform(s). We use a mixture of third and first party cookies. Our lawful basis for using cookies are as follows:

- ▶ **Strictly Necessary Cookies:** We rely on legitimate interests as Our lawful basis for collecting and processing this data;
- ▶ **Functional Cookies:** We rely on consent as Our lawful basis for collecting and processing this data; and
- ▶ **Personalisation (Targeting and Tracking) Cookies:** We rely on consent as Our lawful basis for collecting and processing this data.

Some web browsers incorporate a “Do Not Track” feature. Currently, as there is not yet an accepted industry standard for how to respond to Do Not Track signals, Our Services and Our Platform(s) do not currently respond to such signals, however You can:

- ▶ manage Your Cookie settings independently;
- ▶ if You want to restrict ads in general on Your Devices You may opt out from ad tracking by enabling “Limit Ad Tracking” or “Opt Out of Ads Personalisation” (as applicable to Your Device) in Your Device settings.

For full details about what cookies We set and why We use them, please see Our Cookie Policy available here. Whilst Our Apps do not use cookies, We do use similar technologies to collect information via Our App, for more information about data We collect which is stored on Your device and how We use it, please view Our App Data Storage Policy available here.

## THIRD PARTY ADVERTISING

As well as providing the Services on Our Platform(s), We also feature advertising from third parties. We use a range of advertising partners and technologies to help deliver third party advertisements on Our Platform(s) which may be relevant to You.

To help ensure the advertisements are relevant, We match property listings data, information from cookies and clickstream data to create audience segments. We share Our audience segments with Our advertising partners and only allow certain companies to purchase advertising space on Our Platform(s).

For example third parties may wish to display advertisements to Subscribers of Our Platform(s) which We deem as being renters and therefore We will offer space On Our Platform(s) where renters visit.

We use different technologies and practices for advertisers to purchase advertising space on Our Platform(s). This includes Us selecting advertisements through a bidding process from selected companies which allows real-time advertising on Our Platform(s), working with digital agencies or directly with third party advertisers. You can request a list of the partners with whom We work by contacting Our Data Protection Officer.

To help Us deliver third party advertisements on Our Platform(s) We do use Cookies. For more information, please see Our Cookie Policy available [here](#).

### **SPECIAL CATEGORY DATA & CRIMINAL OFFENCE DATA**

For Our tenant referencing, insurance, tenant and financial Services, We do collect special categories of Personally Identifiable Information about You (this may include Your race or ethnicity, information about Your health, whether you appear on politically exposed persons or sanctions list, and any criminal convictions).

We rely on explicit consent to collect and process this data, however for some information being for insurance products We may rely on 'insurance' as Our condition of processing.

We may collect data on vulnerabilities You disclose to Us. This is on order to support You and improve Our Services to You and We will share this with insurance providers where an insurance sale is made and where Your consent is obtained. We only keep this information for as long as is necessary. We employ appropriate technical and organisational measures to ensure Your Personally Identifiable Information is secure.

Where You are undertaking PEPs and Sanctions checks as part of tenant referencing this may infer special category data and criminal offence data. We rely on substantial public interest, preventing or detecting unlawful acts and regulatory requirements relating to unlawful acts and dishonesty to process this data.

If You are a supplier or prospective supplier and You are a person of significant control we undertake PEPS and Sanction Checks and supplier due diligence checks which may infer special category data or criminal offence data. We rely on substantial public interest, preventing or detecting unlawful acts and regulatory requirements relating to unlawful acts and dishonest to process this data.

### **AGGREGATED DATA**

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from Your Personally Identifiable Information but is not considered Personally Identifiable Information in law as this data does not directly or indirectly reveal Your identity. For example, We may aggregate Your usage data to calculate the percentage of users accessing a specific feature on Our Platform(s).

However, if We combine or connect aggregated data with Your Personally Identifiable Information so that it can directly or indirectly identify You, We treat the combined data as Personally Identifiable Information which will be used in accordance with this Policy.

### **CHANGE OF PURPOSE**

We will only use Your Personally Identifiable Information for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If You wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact Us.

If We need to use Your Personally Identifiable Information for an unrelated purpose, We will notify You and We will explain the legal basis which allows Us to do so. Please note that We may process Your Personally Identifiable Information without Your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **CHANGES TO THIS POLICY**

We may change the terms of this Policy at any time. Any changes We may make to this Policy in the future will be posted on Our Platform(s) and displayed on-screen when You use Our App.

You may be required to read and accept any revised Policy to continue Your use of Our Platform(s). The amended terms will be made available with new uploads or updates of the App and will be displayed in the Privacy Policy section of the App.

Please check back frequently to see any updates or changes to this Policy, as You will be deemed to accept such changes from Your continued use of Our Platform(s).