

PRIVACY POLICY – EXISTING AND FUTURE CLIENTS / LANDLORDS AND TENANTS

We collect and use your personal data to the extent necessary in the framework of our activities and to achieve a high standard of personalised products and services.

This document explains and confirms how we use any personal information we currently hold or collect from you.

1. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

Depending on the type of product or service we provide to you, we may collect or currently hold various types of personal data about you, including:

- identification information (e.g. name, ID card and passport numbers, nationality, place and date of birth, gender, photograph);
- contact information (e.g. postal address and e-mail address, phone number);
- family situation (e.g. marital status, number of children);
- economic, financial and tax information (e.g. tax ID, tax status, income and other revenues, value of your assets);
- education and employment information (e.g. level of education, employment, employer's name, remuneration);
- banking, financial and transactional data (e.g. bank account details, credit card number, money transfers, assets, declared investor profile, credit history, debts and expenses);
- data which relate to your use of our products and services in relation with banking, financial, transactional data and any other real estate data;
- data from your interactions with us (eg: our internet websites, our apps, our social media pages, meeting, call, chat, email, interview, phone conversation, correspondence, requests for information or documents);
- data necessary to fight against over indebtedness, fraud, money laundering and terrorist financing.

We will never ask for personal data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sex orientation, unless it is required through a legal obligation.

2. SPECIFIC CASES OF PERSONAL DATA COLLECTION, INCLUDING INDIRECT COLLECTION

In certain circumstances, we may collect and use personal data of individuals with whom we have, could have, or used to have a direct relationship such as:

- Prospects
- Potential tenants

For some reasons, we may also collect information about you whereas you have no direct relationship with us.

This may happen for instance when your contact details are provided by one of our clients if you are for example:

- Family members;
- Co-borrowers / guarantors;
- Legal representatives (power of attorney);
- Beneficiaries of payment transactions made by our clients;
- Beneficiaries of insurance policies and trusts;
- Landlords;
- Ultimate beneficial owners;
- Clients' debtors (e.g. in case of bankruptcy);
- Company shareholders;
- Representatives of a legal entity (which may be a client or a vendor);
- Staff of service provider and commercial partners.

3. WHY AND ON WHICH BASIS DO WE USE YOUR PERSONAL DATA?

a. To comply with our legal and regulatory obligations.

We use your personal data to comply with various legal and regulatory obligations, including:

- Real estate regulations
- banking and financial regulations in compliance with which we:
 - set up security measures in order to prevent abuse and fraud;
 - detect transactions which deviate from the normal patterns;
 - monitor and report risks that institution could incur; and
 - record, when necessary, phone calls, chats, email, etc.
- reply to an official request from a duly authorised public or judicial authority;
- prevention of money-laundering and financing of terrorism;
- compliance with legislation;
- fight against tax fraud and fulfilment of tax control and notification obligations.

b. To perform a contract with you or to take steps at your request before entering into a contract.

We use your personal data to enter into and perform our contracts, including to:

- provide you with information regarding our products and services;
- assist you and answer your requests;
- evaluate if we can offer you a product or service and under which conditions; and
- provide products or services to our corporate clients of whom you are an employee or a client.
- correspondence

c. To fulfil our legitimate interest.

We use your personal data in order to deploy and develop our products or services, to improve our risk management and to defend our legal rights, including:

- proof of transactions;
- fraud prevention;
- personalising our offering to you through:
 - improving the quality of our products or services;
 - advertising products or services that match with your situation and profile which we achieve.

d. To respect your choice if we requested your consent for a specific processing.

In some cases, we must require your consent to process your data, for example:

- where the above purposes lead to decision-making, which produces legal effects or which significantly affects you. At that point, we will inform you separately about the logic involved, as well as the significance and the envisaged consequences of such processing;
- if we need to carry out further processing for purposes other than those above in section 3, we will inform you and, where necessary, obtain your consent.

4. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In order to fulfil the aforementioned purposes, we only disclose your personal data to:

- Service providers which perform services on our behalf;
- Financial or judicial authorities, arbitrators and mediators, state agencies or public bodies, upon request and to the extent permitted by law;
- Certain regulated professionals such as lawyers, notaries or auditors.

5. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We will retain your personal data for the length required to comply with applicable laws and regulations or with regard to our operational requirements, such as proper account maintenance, facilitating client relationship management, and responding to legal claims or regulatory requests. For instance, most client's information is kept for the duration of the contractual relationship and 10 years thereafter.

6. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

In accordance with applicable regulations, you have the following rights:

- To access: you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- To rectify: where you consider that your personal data are inaccurate or incomplete, you can require that such personal data be modified accordingly.
- To erase: you can require the deletion of your personal data, to the extent permitted by law.
- To restrict: you can request the restriction of the processing of your personal data.
- To object: you can object to the processing of your personal data, on grounds relating to your particular situation. You have the absolute right to object to the processing of your personal data for direct marketing purposes, which includes profiling related to such direct marketing.
- To withdraw your consent: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.

7. HOW TO CONTACT US

Please contact us if you require any further information on our privacy policy. You can contact us by emailing data@ealane.com or by writing to E A Lane & Sons, 100 Regent Road, Leicester, LE1 7DG and mark the envelope 'Data Protection'.