



Privacy Policy

Click 19 Ltd is a company registered in England and Wales.

Your privacy is important to us.

This privacy statement explains what personal data Click 19 Ltd collects from you, through our interactions with you and through our services, and how we use that data.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however appreciate, the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Please contact:

Dale Kime

Email address: GDPR@intouch.cloud

Postal Address: InTouch, Unit 6, Poplars Court, Nottingham, NG7 2RR

Telephone Number: 0115 888 11 55

1. Changes to the privacy policy and your duty to inform us of change

It is important that the Personal Information we hold is accurate and current. Please keep us informed if there are changes during your relationship with us to the Personal Information.

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on the Site. You are advised to review this Privacy Policy periodically for any changes.

2. Third-party links

The Site may include links to third-party websites, plug ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy notice of every website you visit.

Click 19 Ltd T/A InTouch, Unit 6, Poplars Court, Nottingham, NG2 7RR

Company No: 08641478 | Vat Registration No: 169816070

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3. Notice to End users

Click 19 products are intended for use by organisations and are administered to you by your organisation. Please direct your privacy enquiries to your contact the at organisation.

4. How do we collect your personal information?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect personal data you provide to us when you:

- Visit the Website
- contact us via email by clicking on the 'enquiries@intouchapp.co.uk' or 'contact us' links on the Website;
- provide when you sign up to receive our monthly updates through the Website;
- provide when you use the instant messaging function from the Website; sign up to receive our monthly updates via email;
- register as a Customer on the Site;
- input any information concerning Clients onto the Site;
- are provided access to the Site as a Client, estate agents, mortgage broker and other authorised stakeholders to whom the Customer has provided you access to the Site in accordance with our Terms of Service and User Terms of Service; and
- correspond with us by phone, email or otherwise.

We collect, use, store and transfer different kinds of personal data which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes addresses, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details as well as all financial information obtained from the Client in order to perform necessary money laundering checks.
- **Transaction Data** includes details about payments to and from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Site.
- **Profile Data** includes all username and passwords (via a one-way hashing algorithm) to the Site.
- **Usage Data** includes information about how you use our Site, products and services.

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The site is not intended for children and we do not knowingly collect data relating to children.

5. How do we use your personal information?

We will only use the personal data when the law allows us to. Most commonly we will use the Personal Information in the following circumstances:

- Performance of a contract with you
- To provide the products or services you have requested from us
- To answer enquiries, you make
- For payment processing
- To administer our databases for client services, marketing, credit control and financial accounting purposes
- To comply with legal requirements regarding collection and retention of information concerning the products and services that we provide
- For our legitimate business interests
- To inform you of new services and products offered by us
- When you contact us as a prospective employee or contractor

6. What happens if you fail to provide us with your personal information?

Where we need to collect personal data by law, or under the terms of a contract we have with you as a Customer and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you. In this case, we may have to cancel your registration as a Customer, but we will notify you if this is the case at the time.

7. How might we disclose your personal information?

We may disclose your Personal Information (or the personal information of third parties that you may have provided to us) to third party service providers who assist us in providing the services you request.

Please contact the above contact if you require further information on this.

8. What happens if the purpose you collected my personal information for changes?

We will only use the Personal 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

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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 the Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note we may process the Personal Information without your knowledge or consent, in compliance with the above rules, where this is permitted by law.

9. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see

<https://www.intouch.cloud/cookiepolicy>.

10. Security

The security of your Personal Information is important to us but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Some of our services, are provided by third parties and we endeavour to ensure that they also have adequate privacy safeguards in place to protect your Personal Information.

11. Data Storage

Data is stored at the Microsoft Cloud (Azure) Data Centre;

- For UK Customers the data centres are based in London & Cardiff and complies with the ISO 27001 standards. ISO 27001 ensures that Microsoft are continually maintaining and improving information security management. Microsoft Azure also holds the UK Government's 'Official' accreditation - <https://www.microsoft.com/en-us/trustcenter/compliance/uk-g-cloud>. See more in depth legal information here - <https://azure.microsoft.com/en-gb/support/legal/>.
- For Australian Customers the data centres are based in Victoria & New South Wales and are ASD Certified Cloud Services (https://www.asd.gov.au/infosec/irap/certified_clouds.htm). See in depth legal information here - <https://azure.microsoft.com/en-us/global-infrastructure/australia/>.

We will only retain Personal Information for as long as necessary to fulfil the purposes we collected it for, including purposes of satisfying any legal, operational, accounting, or reporting requirements.

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To determine the appropriate retention period, for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of the Personal Information, the purposes for which we process the Personal Information and whether we can achieve those purposes for which we process the Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

12. Access

Under certain circumstances, you have rights under data protection laws in relation to your Personal data. We may charge a reasonable fee if the request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with the requests in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information. This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

13. Your legal rights

You have the right to:

- **Request access** to your Personal Information (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the Personal Information that we hold about you. This enables any incomplete or inaccurate data we hold to be corrected, though we may need to verify the accuracy of the new data provided.
- **Request erasure** of your Personal Information. This enables you to ask us to delete or remove your Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove Personal Information where they have successfully exercised the right to object to processing (see below), where we may have processed the Personal Information unlawfully or where we are required to erase Personal Information to comply with local law. Note, however, that we may not always be able to comply with requests for the erasure as a result of specific legal reasons which will be notified to you, if applicable, at the time of the request.
- **Object to** processing of Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something about the particular situation which makes you object to processing on this ground its feel it impacts on its fundamental rights and freedoms. You also have the right to object where we are processing such Personal Information for direct marketing purposes. In

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some cases, we may demonstrate that we have compelling legitimate grounds to process the Personal Information which override your rights and freedoms.

- **Request restriction** of processing of the Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios: (a) if you need us to establish the Personal Information's accuracy; (b) where our use of the Personal Information is unlawful but you do not want us to erase it; (c) where you need us to hold the Personal Information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to the use of the Personal Information but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your Personal Information to them or to a third party. We will provide you, or a chosen third party, the Personal Information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the Personal Information to perform the contract.
- **Withdraw consent** at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before the withdrawal of your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

14. Time limit

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 several requests. In this case, we will notify you and keep you updated.

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