

Last updated: May 24, 2018

At Node Living UK Limited, Affiliates and Subsidiaries (“Node”, “us”, “we”, “our”), we are committed to protecting your privacy and data protection rights. This Privacy & Cookies Policy (“Policy”) outlines the basis by which any personal data we collect from you will be processed by us.

This Policy governs any data you provide to us directly, through your agent/broker, property search websites, contact information we obtained from our tenants, friends or business partners of potentially interested parties, or data you make available to us while using the <http://www.node-living.com> (the “Site”). The Site is owned by Node Living UK Limited. We may update this Policy from time to time so please check this page regularly as your continued use of the Site signifies your acceptance of any changes.

Node Living UK Limited (company number 10065471).

Address: 43 Berkeley Square, London, W1J 5AP. Contact enquiries@node-living.com

If you reject the terms of this privacy policy or choose not to give us your personal data

If you do not agree to your personal data being used in accordance with this privacy policy, please do not submit your personal data to us through the Site or any other means.

You can choose not to give us personal information. If you choose not to give us personal information, it may mean that we cannot fulfil any contract we may have with you.

Why we use your information and the legal basis for it

Data Protection law says we must have a reason to use your data. This could be to fulfil a contract we have with you, when we have a legal duty to do so, where it is in our ‘legitimate interest’ or where you give us your consent.

To fulfil a lease contract, for example, if you are a tenant, we will process your data to fulfil that contract.

For a legitimate interest, for example, we may send you emails regarding Node updates and invite you to events. You can unsubscribe from these emails at any time.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. If you need details about the specific legal ground we are relying on to process your personal data where more than

one ground has been set out in the table below, please contact us at enquiries@node-living.com.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer/tenant	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) or Consent
To use data analytics to improve our website, products/services, marketing, customer	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to

relationships and experiences		develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about matters that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business) or Consent

What Information Do We Collect?

When you visit our Site, we may obtain two types of information:

- Personal Information you provide to us on an individual basis by submitting information on our forms. This information identifies you or can be used to identify or contact you and may include your name, address, phone number, email address, social media pages and tenancy preferences. Such information is only gathered if you voluntarily submit it to us directly, or through your agent/broker, or from third party property search websites where you may have made an enquiry regarding our listings and provided your information.
- Website use information collected as you and others browse our Site. Similar to other commercial websites, our Website uses a technology called "cookies" and web server logs to collect information about how our Site is used. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our Site, and the websites visited just before and just after our Site. See section "What Are Cookies" below.

Sometimes our tenants, family, friends or business partners provide us with names and email addresses of people they feel may be interested in our product.

For our tenants and prospective tenants, as necessary personal data is processed by us (or by any letting/ managing agent we retain relating to tenants/ prospective tenants/ guarantors) consisting of the following, as applicable; identity and contact details including car registration (if any), personal/background information including occupation/status, bank details, verification and credit status, deposit including return on tenancy termination, tenancy details including renewals, joint tenants, other residents and guarantors, immigration/right to rent checks (England only), rent and other payments, recovery of arrears, claims or possession proceedings, repairs/health and safety/housing conditions, breach of tenancy terms/nuisance/anti social behavior, council tax liability (UK and EU), water charges payable, utilities and services provided, welfare benefits, termination of tenancy, audio and CCTV recordings (if any), complaints,

insurance, health or disability, emails texts and other communications and via our website, website and online portal information.

What Are Cookies?

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. 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.

This privacy policy covers our use of cookies only and does not cover the use of cookies by third parties. We do not control when or how third parties place cookies on your computer. For example, third party websites to which a link points may set cookies on your computer.

How Do We Use Information We Collect from Cookies?

As you browse on our Site, the website uses cookies to differentiate you from other users and may prevent you from seeing unnecessary advertisements, and if applicable, prevent you from having to log in more than is necessary or give us your details more than once. Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting our Website and which parts of the website are most popular. This helps us gather feedback so that we can improve our Site and better serve our customers.

How Do We Use the Information That You Provide to Us?

We use your Information in the following ways:

- to communicate with you;
- to fulfil a contract with you;
- to provide you with services/information you have requested;
- for recordkeeping purposes to track enquiries or correspondence regarding a particular property;
- to track the level of interest in a particular property;
- to notify you of any changes to our service;
- to administer and improve our Site;

- to send you invites, via email, to our social events, you may unsubscribe from this event correspondence at any time.

Who Will Your Information Be Shared With?

- we do not sell or rent your information to third parties;
- we may share your information with third parties we use to provide services to you and to run our business, such as; contractors/ suppliers, utilities and service providers, letting and managing agents, debt collection and tracing agents;
- we may share your information with the third parties we use to provide administrative services, for example [MailChimp](#) for sending out emails; When we use third party service providers, we only disclose personal information necessary to perform that service, for example, email addresses to send emails;
- we may also share your personal information with official bodies that include regulators and tax authorities, lenders, investors or purchasers/potential purchasers, professional advisers such as lawyers and accountants or an advice agency which involves sharing information about you with them, if necessary;
- we may need to share information with your next of kin etc., for example, in an emergency.

Sending data outside the European Economic Area (the 'EEA')

We will only send your data outside of the EEA to comply with a legal duty or work with our suppliers in providing products and services to you. If we do transfer your personal information outside the EEA to our suppliers, we will make sure that it is protected to the same extent as in the EEA. We will use one of these safeguards:

- Transfer it to a non-EEA country where the European Commission has deemed that such country provides an adequate level of protection for personal data.
- Put in place a specific contract approved by the European Commission with the recipient that means they must protect it to the same standards as the EEA.
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.

How Do We Protect Your Information?

- The nature of the internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet. No data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps to protect your Personal Data.

- Email is not recognised as a secure medium of communication. For this reason, we request that you do not send private information to us by email. For prospective tenants, all confidential documents should be uploaded via the Yardi System.
- We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 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.

Where we store your personal data

- we store personal data on secure, third party servers, including cloud based servers.;

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our Site, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

Your Rights

Your rights under data protection law, include the following:

- the right to ask us not to stop using your personal data. You can exercise this right by following the unsubscribe instructions in each marketing communication or by emailing us at enquiries@node-living.com;
- the right to verify that the information we have about you is accurate;
- the right to a copy of your personal information;
- the right to question any information we have about you that you think is incorrect so that we can take reasonable steps to check and correct it;
- you have the right to ask us to delete, remove or stop using your personal information, which is not necessary to fulfil a contract with you;
- to share your data with outside companies, as a digital file, so that you can keep and use it yourself, or give it to other organisations;

- to restrict the use of your data, so that it can only be used for certain things, such as legal claims or to exercise legal rights.

There may be legal or other official reasons why we need to keep or use your data.

You can exercise any of your rights at any time by emailing us at enquiries@node-living.com

How to withdraw your consent

You can withdraw your consent at any time. Please contact us by email at enquiries@node-living.com if you want to do so. This will only affect the way we use information when our reason for doing so is that we have your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. This will not affect the lawfulness of our use of the data before your consent was withdrawn.

How long will you use my personal data for?

We will only retain your personal data 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, if applicable.

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

If you choose not to give us your personal data

You can choose not to give us personal information. We may need to collect personal information by law, or to enter into or fulfil a contract we have with you. If you choose not to give us this personal information, it may mean that we cannot fulfil our contract with you, or do what we are required to do by law.

How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us at: enquiries@node-living.com. You also have the right to complain to the regulator, and to lodge an appeal if you are not happy with the outcome of a complaint. In the UK this is the Information Commissioner's Office <https://ico.org.uk/>

Contact us: If you have any questions regarding this Policy or about how we use your information, please contact us at: enquiries@node-living.com.