

Site Survey + Privacy Policy

1. INTRODUCTION

Site Survey Plus Ltd (“**we**”, “**us**”, “**our**”) is the controller, is responsible for your personal data and is committed to protecting your personal data and respecting your privacy.

This policy (together with our terms of use available on our website (www.sitesurveyplus.com) (“**Site**”) and any additional terms of use incorporated by reference, together our “**Terms of Use**”) applies to your use of:

- The “Site Survey +” mobile and web-based application (“**App**”) hosted on our Site, once you have downloaded the App onto your Apple iPad device (“**Device**”).
- Any of the services accessible through the App (“**Services**”) that are available on our Site or other sites of ours (“**Services Sites**”) unless the Terms of Use state that a separate privacy policy applies to a particular Service, in which case that privacy policy only applies.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Our App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This policy may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next start the App or log onto one of our Services Sites. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

Third party links

Our App and Services Sites may from time to time contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services. Please check these policies before you submit any personal data to these websites or use these services.

2. THE DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data:** first name, last name, username or similar identifier, marital status, title, date of birth, gender.
- **Contact Data:** billing address, delivery address, email address and telephone numbers.

- **Transaction Data:** includes details about payments to and from you and details of in-App purchases.
- **Device Data:** includes the type of device you use, a unique device identifier, network information, your operating system, the type of browser you use, time zone setting.
- **Content Data:** includes information stored on your Device, including login information, photos of properties.
- **Profile Data:** includes your username and password, in-App purchase history, your interests, preferences, feedback and survey responses.
- **Usage Data:** includes details of your use of any of our Apps or your visits to any of our Services Sites including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Location Data:** includes your current location disclosed by GPS technology.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We will collect and process the following data about you:

- **Information you give us.** This is information you consent to giving us about you by filling in forms on our Site and/or the Services Sites, or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use the our Site, download or register our App, subscribe to any of our Services, search for our App or any of our Services, make an in-App purchase, and when you report a problem with the App, our Services, our Site or any Services Site. If you contact us, we will keep a record of that correspondence.
- **Information we collect about you and your device.** Each time you visit one of our Services Sites or use our App we will automatically collect personal data including Device, Content and Usage Data. We collect this data using cookies and other similar technologies. Please see our cookie policy available on our Site for further details.

- **Location Data.** We may use GPS technology to determine your current location. Some of our location-enabled Services may require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings.
- **Information we receive from other sources including third parties and publicly available sources.** We may receive personal data about you from various third parties and public sources including:
 - Device Data from analytics providers such as Google based outside the EU; and
 - Identity and Contact Data from publicly available sources such as Companies House and the electoral register based inside the EU.

4. COOKIES

We use cookies and/or other tracking technologies to enable us to provide you with access to the App, our Services, our Site or Services Sites. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our cookie policy available on our Site.

5. HOW WE USE YOUR PERSONAL DATA

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

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

6. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

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.

Purpose/activity	Type of data	Lawful basis for processing
To install the App and register you as a new App user	Identity Contact Device	Your consent

<p>To process in-App purchases and deliver Services including managing payments and collecting money owed to us</p>	<p>Identity Contact Transaction Device Location</p>	<p>Your consent Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you including notifying you of changes to the App or any Services</p>	<p>Identity Contact Profile Marketing Communications and</p>	<p>Your consent Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)</p>
<p>To administer and protect our business and the App including troubleshooting, data analysis and system testing</p>	<p>Identity Contact Device</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)</p>
<p>To enable you to participate in a prize draw, competition or complete a survey</p>	<p>Identity Contact Device Profile Marketing Communications and</p>	<p>Your consent Performance of a contract with you Necessary for our legitimate interests (to analyse how customers use our products/Services and to develop them and grow our business)</p>
<p>To deliver content and advertisements to you To make recommendations to you about goods or services which may interest you</p>	<p>Identity Contact Device Content</p>	<p>Consent Necessary for our legitimate interests (to develop our products/Services and grow our business)</p>

To measure and analyse the effectiveness of the advertising we serve you	Profile Usage	
To monitor trends so we can improve the App	Marketing Communications and Location	

7. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the third parties set out below for the purposes set out in the above table:

- Our appstore provider.
- Service providers based in the UK who provide development, support and maintenance services for the App.
- Amazon Web Services, who provide data storage services in respect of certain information, including survey reports, generated via the App.
- Stripe, who process payments made through the App.
- Other companies in the Site Survey Plus Ltd group of companies who are based in the UK.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue and Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

8. INTERNATIONAL TRANSFERS

We may transfer your personal data outside the European Economic Area (**EEA**) for the purposes set out in the table above. Whenever we transfer your personal data outside of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

9. DATA SECURITY

All information you provide to us is stored on our secure servers. Certain information that is generated via the App, including survey reports, is also stored by Amazon Web Services. Where we have given you (or where you have chosen) a password that enables you to access certain parts of the App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

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

10. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available on request.

In the event that you do not use the App for a period of six (6) months then we may treat the account as expired and your personal data may be deleted.

11. YOUR LEGAL RIGHTS

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have

the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data 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 information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw 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.

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us using the details set out below.

12. CONTACTING US AND COMPLAINTS

If you have any questions about this privacy policy, please contact us using the details set out below.

- Email address: support@sitesurveyplus.com

- Postal address: 8A Overland Road, Langland, Swansea. SA3 4LS

You also 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 or other competent supervisory authority of an EU member state if the App is downloaded outside the UK.