
PRIVACY POLICY

BACKGROUND:

Tein Property Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.swanstein.co.uk and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested when you get into contact with us by email, phone or completing the Investor Registration Form.

1. Information About Us

Our Site is owned and operated by Swanstein Property Ltd, a private company limited by shares and registered in England and Wales under company number 14117173.

Registered address and trading address: International House, Office 5, Crays Avenue, Orpington, BR5 3RS.

Data Protection Officer: Thorsten Sprank.

Email address: info@swanstein.co.uk.

Telephone number: 02080505074

2. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.

- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

5. What Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. We do not collect any data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including full name, title, date of birth	Copy of passport/identity card. Name is asked on the Investor Registration Form.
Contact information including home address, email address, phone number	Document of Proof of Address. Email address and phone number is asked on the Investor Registration Form.
Business information including business	Based on your information by phone and/or

name and address, profession, industry	email.
Profile information including investment preferences, investment amount, available funds (e.g. savings)	Based on your information on phone or email. Area of investment interest and range of investment amount is asked on the Investor Registration Form.

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we will use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you in our database through Our Site.	Full name, email address, phone number, area of investment interest, investment amount.	The Anti-Money Laundry Legislation requires us to verify your identity and your current home address. Beyond that your legitimate interest is to get to know you and your investment requirements.
Administering our business.	Full set of your provided personal data.	Our legitimate interest is to organise all our personal data in a structured way to identify which investment opportunities might be of interest to you.
Supplying our services to you.	Full name, email address, phone number, area of investment interest, investment amount, any other investment related personal data you provided us with.	Our legitimate interest is to be able to provide you with relevant offers and opportunities and to support you in the process of your real estate transaction.
Personalising and tailoring our services for you.	Area of investment interest, investment amount, any other investment related personal data you provided us with..	Our legitimate interest is to organise all our personal data in a structured way to identify which investment opportunities might be of interest to you..
Communicating with you.	Email address, phone number, home address.	Our legitimate interest is to be able to provide you with relevant offers and opportunities and to support you in the process of your real estate transaction.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email or telephone or text message with information, news, and offers on our services. You

will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 12.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. The following factors will be used to determine how long your personal data is kept:

Your data will be kept as long as there is an ongoing business relationship between you and us and you are interested in our services. Data and files. If your personal data have become part of our accounting records we will have to keep our accounting records for for 6 years from the end of the last company financial year they relate to, or longer if they show a transaction that covers more than one of the company's accounting periods or the company has bought something that it expects to last more than 6 years.

8. How and Where Do You Store or Transfer My Personal Data?

We will store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

We also store some or all of your personal data on the server of Mailchimp software (www.mailchimp.com) in the USA. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;
- using strong password with secure internet connection accessing Mailchimp;

- providing your personal data only to real estate professionals in the UK who also work under the Data Protection Legislation.

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

We may have to share your personal information if you get involved into financing for the purchase of real property in the UK. We would use mortgage brokers based in the UK in order to find suitable financing products. You would always be informed and asked for consent before we start to share your personal data.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. Can I Withhold Information?

You may access Our Site without providing any personal data at all.

11. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 5 working days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: info@swanstein.co.uk.

Telephone number: +44 (0) 2080505074.

Postal Address: International House, Office 5, Crays Avenue, Orpington, BR5 3RS.

13. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects

personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date. This Privacy Policy was last updated on 23 January 2023.

14. **Attribution**

This Privacy Policy has been created using a document template from www.simply-docs.co.uk.