

## PRIVACY POLICY

### Who are we?

We are Becave Ltd, a company which provides you with an easy, safe and transparent way to let or rent properties without hidden costs. Our contact details are set out at the end of this Privacy Policy.

### What does this Policy cover?

This Privacy Policy explains our use of personal data through the Becave platform and if you choose to contact us.

### What personal data do we collect and why do we use it?

The table below explains who we collect personal data about, what that personal data is and the purpose. The last column sets out the 'lawful basis' we rely on for processing that personal data which is a requirement of data protection rules. Essentially, companies may only process personal data if they can identify a lawful basis from a list set out in the legislation.

Individual	Personal Data	Source and Purpose	Lawful Basis for Processing
Becave platform visitors	Information from cookies. [For more details see our Cookie Notice.]	This information is collected via the cookies when you use our platform.  [Analytics][Marketing][ <b>Note: will depend on what you are actually using in the way of cookies.</b> ]	We only install non-essential cookies with your consent. [For more details see our Cookie Notice.]
Registered landlord users	[Contact details, DOB, nationality, payment information]	This information is collected when you create an account and complete the profile section of your account or list a property.	The information is also necessary for us to perform our contract with you and facilitate your property bookings.  We also retain details for our legitimate interests of defending or bringing claims and for fraud checks.
Registered tenant users	[Contact details, DOB, nationality, payment information]	This information is collected when you create an account and complete the profile section of your account or make a booking.	Our legitimate interests in verifying the details tenant users have provided us are true and accurate, to carry out insolvency and credit checks on such users, assess the suitability of users to proceed with renting a

			<p>property via our platform, and process any such booking.</p> <p>We also retain details for our legitimate interests of defending or bringing claims and for fraud checks.</p>
Registered users	Contact details provided and correspondence.	This information is given to us by you.	Our legitimate interest in sending you direct marketing communications relating to our services or the properties available on our platform, according to your marketing preferences.
Suppliers and contractors	Contact details and provided correspondence.	<p>This information is given to us by you or from publicly available information (for example on your platform).</p> <p>It is used for us to fulfil contracts and engage in business discussions.</p>	Our legitimate interests as a business in responding to and keeping a record of correspondence. Some information is also necessary for us to perform our contract – for example certain contact details.

### **How long do we keep your personal data for?**

We keep your information only for as long as is necessary for the relevant purpose. For example, if we have a contract with you, this will be for 6.5 years after expiry in order to assist us with any contractual claims. We use a number of criteria for determining the retention period including obligations under law, our need to defend or bring contractual claims within the statutory limitation period and consideration of the original purpose we collected it for.

### **Who do we share your personal data with?**

Data may be shared in the following circumstances:

- With professional advisors;
- In order to conduct checks on you to verify the information you have provided us with;
- In the event of a sale of the company or its assets;
- With suppliers but only subject to robust contractual protections;
- With our debt collection agencies to recover debts owed to us;
- With landlords where you make a booking request via the Becave service.

### **What happens if you do not provide us with the information we request or ask that we stop processing your information?**

If you do not provide the personal data necessary, you won't be able to make a Listing or Booking and we may not be able to respond to your query or consider your request.

### **Do we make automated decisions concerning you?**

Automated decisions are those made without human intervention that have a legal effect on you or other similarly significant effect (for example barring you from a contract). We do not carry out this type of processing activity.

### **Do we transfer your data outside the UK or Europe?**

We may sometimes transfer your personal data to countries outside the UK and European Economic Area, for example if we are using a supplier based elsewhere. You can find the list of member states by clicking on the following link: [https://europa.eu/european-union/about-eu/countries/member-countries\\_en](https://europa.eu/european-union/about-eu/countries/member-countries_en). The privacy laws in countries outside the European Economic Area and UK may be different from those in your home country.

Where we transfer data to a country that has not been deemed to provide adequate data protection standards, we always have security measures and approved European model clauses or other adequate safeguards in place to protect your personal data. Please contact us if you would like more details about our safeguards for data transfers.

### **What rights do you have in relation to the data we hold on you?**

By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country. In the UK this is the Information Commissioner.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request in some circumstances.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

<b>Rights</b>	<b>What does this mean?</b>
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Privacy Policy. If you have any additional questions, for example regarding transfers and locations of data or our legitimate interests basis, do please get in touch.
2. The right of access	You have the right to obtain access to your information (if we are processing it), and certain

		<p>other information (similar to that provided in this Privacy Policy).</p> <p>This is so you're aware and can check that we're using your information in accordance with data protection law.</p>
3.	The right to rectification	You are entitled to have your information corrected if its inaccurate or incomplete.
4.	The right to erasure	This is also known as the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right, there are exceptions.
5.	The right to restrict processing	You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
6.	The right to data portability	You have rights to obtain and reuse your personal data for your own purposes across different services. This is not a normal scenario for companies of our nature but if you have any questions you can contact us.
7.	The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing or where we are relying on our legitimate interests for processing.
8.	The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.
9.	The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

### How can you contact us?

If you are unhappy with how we've handled your information or have further questions on the processing of your personal data, contact us here: [\[address\]](#), [\[email\]](#).