Campions Group
Privacy Policy

CAMPIONS

Campions Group Privacy Policy

Employee Policy Notice: C/GDPR/01

Sponsor: Compliance Director

Issue Date	Review Date	Comments	Re-viewed by
Oct 2024	Oct 2025	Current	

We are committed to ensuring that your privacy is protected and this Privacy Policy governs our use of your personal data. Please read this policy carefully as it contains important information on who we are, what data we collect, how and why we collect it, how we use and share your personal data and where we store it.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

When we collect and use your personal information, we are subject to the General Data Protection Regulation and the Data Protection Act 2018 and for the purpose of these laws; we are responsible as the 'controller' of the personal data.

1. Who we are

We are Campions Group Limited, company number 14763280. This privacy policy is issued on behalf of all those businesses, representative offices, branches and applicable third parties which are majority-owned subsidiaries of Campions Group Limited (including but not limited to Chase Buchanan Group Limited, Chesterton UK Services Limited and Campions Portfolio Ltd).

Key terms used within this policy:

We, us, our	Campions Group Limited (Including but not limited to any subsidiaries trading as Campions Lettings & Management, Chase Buchanan and Chestertons.)
Team responsible for data protection compliance	Data Protection Officer, 5th Floor West, The Lantern Building, 75 Hampstead Road, London, NW1 2PL
You or Your	Refers to anyone whose personal data we process

2. What data we collect

Personal data is any information that tells us something about you where you are directly or indirectly identified or identifiable as an individual. We may collect and use the following personal data about you.

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, your image (be that photographic or video), nationality (purely for the purposes of complying with the Immigration Act 2014) and gender.
- **Contact Data** includes residential address, property ownership information, relevant contact addresses, email address and telephone numbers.
- **Financial Data** includes bank account, payment card details and information to enable us to undertake Anti Money Laundering and Terrorist Financing electronic checks on you

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **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 website.
- **Profile Data** includes purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Call recordings** includes recording all calls made and received externally.
- **CCTV Footage** includes your image where recorded within our branch network.

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 website 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.

This personal data is required to provide our services to you. If you do not provide the personal data we ask for, it may delay or prevent us from providing services to you.

We do collect Special Categories of Personal Data about you (this may include 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). We may also collect information about criminal convictions and offences.

3. How do we collect personal data

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes personal data you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- contact us through social media;
- request marketing to be sent to you;
- walk-in to our branch offices;
- enter a competition;
- promotion or survey;
- give us some feedback;
- speak with us on the telephone and we record the call;
- make a complaint;

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see the relevant cookie policy published on the applicable website for further details.

- We use **Truconversion** in order to better understand our users' needs and to optimise this service and experience. Truconversion is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like,

etc.) and this enables us to build and maintain our service with user feedback. Truconversion uses cookies and other technologies to collect data on our users' behaviour and their devices. This includes a device's IP address (processed during your session but not stored), device screen size, device type (unique device identifiers), browser information, geographic location (country & region only), and the preferred language used to display our website. Truconversion stores this information on our behalf in a pseudonymised user profile.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

Data directly from a third party:

- sanctions screening providers;
- payment service providers;
- credit and tenant referencing agencies;
- government or police databases or registers;
- customer due diligence providers;
- property portals through which you request our services.

Technical Data from the following parties:

- analytics providers such as Google based outside the EU;
- advertising networks such as Google based outside the EU; and
- search information providers such as Google based outside the EU;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as First Data or FiServe who may be based outside the EU.
- Identity and Contact Data from loss adjustors or appointed contractors.
- Identity and Contact Data from data brokers or aggregators.
- Identity and Contact Data from publicly available sources.

Identity and Contact Data from data brokers or aggregators who may be based outside the EU such as Rightmove, Zoopla (based inside the EU) or Facebook (based outside the EU).

Identity and Contact Data from publicly available sources such as social media sites, including Facebook, YouTube and LinkedIn (based outside the EU), Companies House, HM Land Registry and the Electoral Register (based inside the EU).

4. How we use personal data

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

- Where we need to perform the contract we are about to enter into or have entered into 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 obligation.

Click here to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

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. Please contact us 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer and provide services to you.	(a) Identity (b) Contact	For the performance of our contract with you or to take steps at your request before entering into a contract.
To prevent and detect fraud against you or us	(a) Identity (b) Contact (c) Financial (d) Transaction	For our legitimate interest or those of a third party, i.e. to minimise fraud that could be damaging to you and us.
To process and deliver your order including: - Manage payments, fees and charges - Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Performance of a contract Necessary for our legitimate interests (to recover debts due to us)
To manage insurance claims	(a) Identity (b) Contact (c) Financial	Performance of a contract Necessary to comply with a legal obligation
To manage our relationship with you which will include: - Updating and enhancing customer records - Notifying you about changes to our terms or privacy policy - Asking you to leave a review or take a survey	a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
Conducting checks to identify our customer and verify their identity. Screening for financial and other sanctions or embargoes. Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator	(a) Identity (b) Contact (c) Financial (d) Transaction	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	(a) Identity (b) Contact (c) Financial (d) Transaction	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	(a) Identity (b) Contact (c) Profile (d) Financial (e) Transaction (f) Marketing and Communications	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, range of services or other efficiency measures	(a) Identity (b) Contact (c) Profile (d) Financial	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you

	(e) Transaction (f) Marketing and Communications	
Statutory returns	(a) Identity (b) Financial (c) Transaction	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	(a) Profile (b) Financial (c) Transaction	To comply with our legal and regulatory obligations. For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
To record telephone calls both incoming and outgoing	(a) Contact (b) Profile	Performance of a contract with you Necessary for our legitimate interests (to train staff and maintain high levels of 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	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) Necessary to comply with a legal obligation
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
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)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(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 develop our business and to inform our marketing strategy)
Marketing our services to: — existing and former customers; — third parties who have previously registered with us or expressed an interest in our services; — third parties with whom we have had no previous dealings	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We will hold your personal data on our client management systems and use this to provide you with marketing information about similar services offered by us to those which you have engaged us to provide which we feel you might find useful from time to time. You have the opportunity to opt out of receiving this information at any time.

5. Who we share your personal data with

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers (where possible) to ensure they can only use your personal information to provide services to us and to you. These will include but will not be limited to:

- If we sell any part of our business and/or integrate it with another organisation, your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their adviser. If this occurs, the new owners of the business will only be permitted to use your information in the same or similar way as set out in the privacy policy.
- We will share personal data with our regulators, governmental or quasi-governmental organisations, law enforcement authorities and with courts, tribunals and arbitrators as may be required from time to time in order to comply with our regulatory and legal obligations.
- We may share a anonymised version of your personal data to third parties such as Facebook and google to enable these third parties to display our ads when you visit their websites.
- We may share your personal information with any person working within the Campions Group Limited on a need to know basis to ensure we are able to perform our obligations to you.
- We routinely share personal data with:
  - Third parties we use to help deliver our services to you, e.g. payment service providers, referencing companies, electronic AML due diligence providers, utility concierge services, maintenance contractor, inventory companies etc.;
  - Other third parties we use to help us run our business, e.g. website suppliers, online tenancy progression platforms, case management system providers etc.;
  - Third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;
  - Credit reference agencies;
  - Our banks.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform then that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertiser's wishes by displaying their advertisement to that target audience. Analytics and search engine providers that assist us in the improvement and optimisation of our site. Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you or for the purposes of completing an anti-money laundering identity check, in accordance with our legal obligations.

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 **our cookie policy.**

Online ads

We use online advertising to keep you aware of what we're up to and to help you find our products. Like many companies, we may target banners and ads to you when you use other websites and apps, based on your Contact, Technical, Usage and Profile Data. We do this using a variety of digital marketing networks and ad exchanges, and a range of advertising technologies such as web beacons, pixels, ad tags, cookies, and mobile identifiers, as well as specific services offered by some sites and social networks, such as Facebook's Custom Audience Service.

Our use of analytics and targeted advertising tools

We use a range of analytics and targeted advertising tools to display relevant website content on our website and online advertisements on other websites and apps (as described above) to you, deliver relevant content to you in marketing communications (where applicable), and to measure the effectiveness of the advertising provided. For example, we use tools such as Google Analytics to analyse Google's interest-based advertising data and/or third-party audience data (such as age, marital status, life event, gender and interests) to target and improve our marketing campaigns, marketing strategies and website content. We may also use tools provided by other third parties, such as Facebook to perform similar tasks, using your Contact, Technical, Usage and Profile Data.

In order to opt out of targeted advertising you need to disable your 'cookies' in your browser settings or opt-out of the relevant third-party Ad Settings. For example, you can opt-out of the Google Display Advertising Features. As an added privacy measure, you can also use the The Digital Advertising Alliance (which includes companies such as Google and Facebook), who provides a tool called WebChoices that can perform a quick scan of your computer or mobile devices, find out which participating companies have enabled customised ads for your browser, and adjust your browser preferences accordingly.

6. Where we keep your data

The security of your data is very important to us and we have measures in place, which are designed to prevent unauthorised access to your personal data including but not limited to:

- Our client files are stored on our secure client management systems. Access is restricted on our client systems to those within the business who are required to have access to your information for legitimate business purposes.
- Hard copy documentation is stored in locked cabinets within our offices.

All data is hosted in datacentres which have systems and protections in place to protect against both unauthorised access, and other external factors that could cause damage to, your personal data. There are strict access requirements in place and access is restricted to those absolutely necessary.

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.

7. Overseas transfers of your personal data

We may transfer your personal data to an external third party which is based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out 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. For further details, see *European Commission: Adequacy of the protection of personal data in non-EU countries*.

or

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. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.

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

8. For how long do we keep your personal data

We will not keep your personal data for longer than we need to, the period for which we will keep your personal data will depend on the type of service you have requested from us. The retention period may be longer than the

period for which we are providing services to you where we have statutory or regulatory obligations to retain personal data for a longer period, or where we may need to retain information in case of legal claim.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your rights in relation to your personal information

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- 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 your personal data. - 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 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.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request transfer of your personal data. - 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.

- Right to withdraw consent. - 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.

If you wish to exercise any of the rights set out above, please contact us.

Please note that we will keep a record of the fact that you have made a request to exercise your rights, and our response to your request, in order to demonstrate compliance with our data protection obligations and so that we can handle any queries, complaints or claims in relation to your request. This record will be kept in accordance with our retention policies at section 8 above.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Complaints and contact details

Complaints

If you have any complaints about the way we use your personal data please contact the data protection officer at dpo@campionsgroup.co.uk who will try to resolve the issue. If we cannot resolve any issue, you have the right to complain to the Information Commissioner Office (ICO). If you need more information about how to contact the ICO please let us know.

Contact details

If you have any questions, comments or requests regarding any aspect of this Privacy Policy, please do not hesitate to contact us by sending an email to dpo@campionsgroup.co.uk or writing to the Data Protection Officer, 5th Floor West, The Lantern Building, 75 Hampstead Road, London, NW1 2PL

11. Updates to this notice

From time to time we may need to make changes to this notice, for example, as the result of changes to law, technologies, or other developments.

This notice was last updated Oct 2024