



Kalms Property Finance Limited: Our Privacy and Cookies Policy

Introduction

Kalms Property Finance Limited (“KPFL”) is committed to using any personal data that we hold responsibly, conscientiously and respectfully. This Privacy Policy aims to give you information on how KPFL collects and processes your personal data through the provision of finance broking services.

This Privacy Policy outlines how, when and why we collect your personal information, how we store it to ensure it remains secure, and how you can remove your personal data from our system if you wish to.

Kalms Property Finance Limited is a limited liability company incorporated in England and Wales (Company number 10532684). Kalms Property Finance Limited is the data controller and responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

Full name of legal entity: Kalms Property Finance Limited

Name of DPO: Samuel Kalms, Executive Director

Email address: skalms@kpfinance.co.uk

Postal address: 22-25 Portman Close, Marylebone, London, W1H 6BS

Telephone: 0203 488 1128 / 07932 796 382

ICO: ZA246735

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection.

To make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues you can contact them at Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, on 0303 123 1113 or by email to casework@ico.org.uk. See also <https://ico.org.uk/global/contact-us/>.

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



Third Party Links

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

We never share, sell or trade your personal information to any third parties. We will always ask for your consent to share your data with organisations who you may wish to hear from.

Privacy Policy Updates

Our Privacy Policy is regularly reviewed. We may need to make updates from time to time, to take into account either changes in legislation or changes at KPFL. Any updates to our Privacy Policy will be posted on our website.

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 your relationship with us.

The personal information we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you engage with us, either online, over the phone or in person, we may need to collect information from you in order to provide the service you are requesting. This information may include:

- Identity Data such as your name, title, date of birth, marital status and gender.
- Contact Data such as your billing address, delivery address, email address and telephone numbers.
- Financial Data such as your bank account details, salary/income details of any individual involved in the proposed transaction, accounts of any company involved in the proposed transaction, VAT information, tax status information, statements of assets and liabilities, personal expenditure, tax documents (SA302) and payslips.



- Transaction Data such as details about your property finance requirements, details of proposed purchase property, details of your lender requirements, tenancy schedules, portfolio schedules, employment details, and CV/Track record.
- Technical Data such as your internet protocol (IP) address, 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 our website. Profile Data such as your username and password, preferences, feedback and survey responses.
- Usage Data such as information about how you use our website.
- Marketing and Communications Data such as your preferences in receiving marketing from us and our third parties and your communication preferences.

The information you share with us helps us tailor our services. 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. We will only collect data that falls into these Special Categories if you are applying for a job or are working with us; in such circumstances, the provision of such data is optional and consent will be obtained to store this data in accordance with applicable laws.

We do not knowingly collect any information from anyone under 16 years of age.

Our website and services are directed to people who are at least 16 years old or older. If you are under 16, do not use or provide any information on our website or on or through any of its features and please do not register on the website or provide any information about yourself to us, including your name, address, telephone number or email address. If we learn we have collected or received personal information from a child under 16, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us using the contact details below.

If you fail to provide personal data where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. The file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its



operations to your needs, likes and dislikes by gathering and remembering information about your preferences. You can find out more about Cookies on the [ICO website](#) including how to switch off Cookies in your browser. Please note that some Cookies are required in order to make a website work and so by switching Cookies off in your browser you may not be able to use our website.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

How we collect your personal information

We collect your personal information through direct interactions, automated technologies or interactions or publicly available third party sources. We also collect personal information provided to us by potential introducers of business. We only collect the information that we need to carry out our business and to provide any services that you have requested.

How we use your personal information

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

To carry out our business and provide you with a service requested by you:

- 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 interest (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 requirement.

How we protect your personal information

KPFL is committed to ensuring that your personal information is stored safely and securely. We have invested in appropriate technology and software to ensure that information cannot be accessed by unauthorised persons, and have in place a robust internal data processing policy to ensure that any staff, contractors or volunteers that come into contact with your personal data understand how and when it can be processed. Regular security reviews are held by us to ensure that the site remains safe and secure for your protection.



Data retention policy

We will only hold your information for as long as is necessary to conduct our business, unless you change your preferences or request your data to be removed at an earlier date. This retention period will vary depending upon the purpose for which your data was collected. If you have worked with us, we will typically keep your data for 5 years from the date of your last day of paid work with us. For specific details on how long we will keep your personal data for, please contact us on the details outlined in the section below.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out above, please contact us at skalms@kpfinance.co.uk.

You have the rights to:

- Right to be informed – Individuals have the right to be informed about the collection and use of their personal data
- The right of access to your personal data – Individuals have the right to access and receive a copy of their personal data and other supplementary information.
- The right to rectification- Individuals have the right to have inaccurate personal data rectified or completed if incomplete.
- The right to erasure – Individuals have the right to have their personal data erased.
- The right to restrict processing – Individuals have the right to request the restriction or suppression of their personal data.
- The right to portability – This allows individuals to obtain and reuse their personal data for their own purposes across different services.
- The right to object – this gives individuals the right to object to the processing of their personal data in certain circumstances, it also gives individuals the absolute right to stop their data being used for direct marketing
- The right in relation to automated decision making and profiling – this allows individuals to object to their data being used in an automated individual decision-making process (making a decision solely by automated means without any human involvement) and profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.

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:

- (a) if you want us to establish the data's accuracy
- (b) where our use of the data is unlawful but you do not want us to erase it
- (c) 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
- (d) 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.

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 may 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 may 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.