



ROI Property Sourcing

ROI Property Sourcing – Data Protection Policy

Introduction

Strategic PM Solutions Ltd. t/a ROI Property Sourcing (referred to as “ROI”, “We”, “Us”, “Our” from here forward) 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 contacts us 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 regulation, the General Data Protection Regulations 2018 (“GDPR”, “the Regulation”).

By providing your Personal Data, you are affirming that you are over 18 years of age.

For the purpose of the General Data Protection Regulations 2018, ROI are the data controller and are registered with the Information Commissioner’s Office as such with registration number ZB831131. Please see <https://ico.org.uk/ESDWebPages/Entry/ZB831131> for further details.

Roles and Responsibilities

ROI’s Data Protection Officer is:

Email:

Tel No:

In Writing:

Andrew Murray (Director)

andy@roiproperty sourcing.com

07792499353

ROI Property Sourcing.

23 Osterley Crescent,

Isleworth.

London TW7 5LF

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

If you are not happy with any aspect of how We obtain, hold or use your personal data then you have a right to make a complaint to the Information Commissioners Office (ICO) – www.ico.org.uk - We would however prefer that you contact Us first and be given an opportunity to resolve any issue that you might have.

The Regulation defines “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic,

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Registered Company Address: 23 Osterley Crescent, Isleworth. London TW7 5LF

Registered Company Number: 10720462

Email: andy@roiproperty sourcing.com Telephone: 07792 499353

The Property Ombudsman (TPO) Registered Number: T11725

Information Commissioners Office (ICO) Registration Number: ZB831131

HMRC Anti-Money Laundering Supervision Registration Number: XZML00000204779

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cultural, or social identity of that natural person.

This Policy sets out the procedures that are to be followed when dealing with personal data. The procedures and principles set out herein must be followed at all times by ROI, its employees, agents, contractors, or other parties working on behalf of ROI.

ROI is committed not only to the letter of the law but also to the spirit of the law and places a high premium on the correct, lawful and fair handling of all personal data, respecting the legal rights, privacy and trust of all individuals with whom it deals.

Summary

ROI will at all times:

- a) Be transparent about what information:
 - i. We collect
 - ii. Why we collect it
 - iii. How we store it
 - iv. Where we store it
 - v. What we do with it
 - vi. When we dispose it
 - vii. How we dispose it
- b) Have measures in place to protect your personal data and keep secure.
- c) Respect your rights under GDPR and aim to give you control over your own personal data.
- d) Cease communication with you if requested to do so.

1. The Data Protection Principles

This Policy aims to ensure compliance with the Regulation. The Regulation sets out the following principles with which any party handling personal data must comply. All personal data must be:

- a) Processed lawfully, fairly and in a transparent manner in relation to the data subject.
- b) Collected for specified, explicit and legitimate purpose and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

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- d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay.
- e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject.
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. Lawful, Fair, and Transparent Data Processing

The Regulation seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The Regulation states that processing of personal data shall be lawful if at least one of the following applies:

- a) The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- b) Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract.
- c) Processing is necessary for compliance with a legal obligation to which the controller is subject.
- d) Processing is necessary to protect the vital interests of the data subject or of another natural person.
- e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- f) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

3. Processed for Specified, Explicit and Legitimate Purposes

- 3.1 ROI collects and processes the personal data set out in Part 20 of this Policy. This may include personal data received directly from data subjects (for example, contact details used when a data subject communicates with us).

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- 3.2 ROI only processes personal data for the specific purposes set out in Part 20 of this Policy (or for other purposes expressly permitted by the Regulation). The purposes for which we process personal data will be provided to data subjects either via our 'Seller/Investor Information Pack', which contains a copy of our 'Client Data Privacy Guide' or a link to our company Data Privacy, Cookie & Retention Policy either at the time that their personal data is collected via a 'Contact Us' section (must tick to indicate they have read), or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party.

A link to a copy of our Data Privacy, Cookie & Retention Policy is available to at any time. Please email info@roipropertiesourcing.com.

4. Adequate, Relevant and Limited Data Processing

ROI will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to data subjects as under Part 3, above.

5. Accuracy of Data and Keeping Data Up To Date

ROI shall ensure that all personal data collected and processed is kept accurate and up-to-date. The accuracy of data shall be checked when it is collected and at 12 monthly intervals thereafter. Where any inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

6. Data Retention

ROI shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay.

For full details of the Companies approach to data retention, including retention periods for specific personal data types held by ROI, please refer to our Data Retention Policy section later in this document.

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7. Secure Processing

ROI shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Further details of the data protection and organisational measures, which shall be taken, are provided in Parts 22 to 28 of this Policy.

8. Accountability

- 8.1 ROI's Data Protection Officer is Andrew Murray (Director) Email: andy@roiproperty sourcing.com
- 8.2 The Data Protection Officer shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, ROI's other data protection-related policies, and with the GDPR and other applicable data protection legislation.
- 8.3 ROI shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:
- The name and details of ROI, its Data Protection Officer, and any applicable third-party data processors.
 - The purposes for which ROI processes personal data.
 - Details of the categories of personal data collected, held, and processed by ROI; and the categories of data subject to which that personal data relates.
 - Details (and categories) of any third parties that will receive personal data from ROI.
 - Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards.
 - Details of how long personal data will be retained by ROI; and
 - Detailed descriptions of all technical and organisational measures taken by ROI to ensure the security of personal data.

9. Data Protection Impact Assessments

ROI shall carry out Data Protection Impact Assessments for any and all new projects and/or new uses of personal data, which involve the use of new technologies and the processing involved is likely to result in a high risk to the rights and freedoms of data subjects under the Regulations.

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Privacy Impact Assessments shall be overseen by ROI's data protection officer and shall address the following areas of importance:

- a) The types of personal data that will be collected held and processed.
- b) The purpose(s) for which personal data will be used.
- c) The Companies objectives.
- d) How personal data is to be used.
- e) Any parties (internal or external) who may be consulted.
- f) The necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed.
- g) Risks posed to data subjects.
- h) Risks posed both within and to ROI; and
- i) Proposed measures to minimise and handle identified risks.

10. The Rights of Data Subjects

The GDPR sets out the following rights applicable to data subjects (please refer to the parts of this policy indicated for further details):

- a) The right to be informed (Part 11);
- b) The right of access (Part 12);
- c) The right to rectification (Part 13);
- d) The right to erasure (also known as the 'right to be forgotten') (Part 14);
- e) The right to restrict processing (Part 15);
- f) The right to data portability (Part 16);
- g) The right to object (Part 17);
- h) Rights with respect to automated decision-making and profiling (Parts 18 and 19).

11. Keeping Data Subjects Informed

11.1 ROI shall ensure that the following information is provided to every data subject when personal data is collected:

- a) Details of ROI including, but not limited to, the identity of Andrew Murray (Director), its Data Protection Officer;
- b) The purpose(s) for which the personal data is being collected and will be processed (as detailed in Part 20 of this Policy) and the legal basis justifying that collection and processing;
- c) Where applicable, the legitimate interests upon which ROI is justifying its collection and

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processing of the personal data;

- d) Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
- e) Where the personal data is to be transferred to one or more third parties, details of those parties;
- f) Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the “EEA”), details of that transfer, including but not limited to the safeguards in place (see Part 28 of this Policy for further details concerning such third country data transfers);
- g) Details of the length of time the personal data will be held by ROI (or, where there is no predetermined period, details of how that length of time will be determined);
- h) Details of the data subject’s rights under the Regulation;
- i) Details of the data subject’s right to withdraw their consent to ROI’s processing of their personal data at any time;
- j) Details of the data subject’s right to complain to the Information Commissioner’s Office (the ‘supervisory authority’ under the Regulation);
- k) Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it;
- l) Details of any automated decision-making that will take place using the personal data (including but not limited to profiling), including information on how decisions will be made, the significance of those decisions and any consequences.

11.2 The information set out above in Part 10.1 shall be provided to the data subject at the following applicable time:

11.2.1 Where the personal data is obtained from the data subject directly, at the time of collection;

11.2.2 Where the personal data is not obtained from the data subject directly (i.e. from another party):

- a) If the personal data is used to communicate with the data subject, at the time of the first communication; or
- b) If the personal data is to be disclosed to another party, before the personal data is disclosed; or
- c) In any event, not more than one month after the time at which ROI obtains the personal data.

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12. Data Subject Access

- 12.1 A data subject may make a subject access request (“SARs”) at any time to find out more about the personal data which ROI holds about them. ROI is normally required to respond to SARs within one month of receipt (this can be extended by up to two months in the case of complex and/or numerous requests, and in such cases the data subject shall be informed of the need for the extension).
- 12.2 All subject access requests received must be forwarded to Andrew Murray (Director) ROI’s Data Protection Officer. Email: andy@roiproperty sourcing.com
- 12.3 ROI does not charge a fee for the handling of normal SARs. ROI reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

13. Rectification of Personal Data

- 13.1 If a data subject informs ROI that personal data held by ROI is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt the data subject’s notice (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).
- 13.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification of that personal data.

14. Erasure of Personal Data

- 14.1 Data subjects may request that ROI erases the personal data it holds about them in the following circumstances:
 - a) It is no longer necessary for ROI to hold that personal data with respect to the purpose for which it was originally collected or processed.
 - b) The data subject wishes to withdraw their consent to ROI holding and processing their personal data.
 - c) The data subject objects to ROI holding and processing their personal data (and there is no overriding legitimate interest to allow ROI to continue doing so) (see Part 17 of this

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Policy for further details concerning data subjects' rights to object).

- d) The personal data has been processed unlawfully.
- e) The personal data needs to be erased in order for ROI to comply with a particular legal obligation.

- 14.2 Unless ROI has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).
- 14.3 In the event that any personal data that is to be erased in response to a data subject request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

15. Restriction of Personal Data Processing

- 15.1 Data subjects may request that ROI ceases processing the personal data it holds about them. If a data subject makes such a request, ROI shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place.
- 15.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

16. Data Portability

- 16.1 ROI processes personal data using automated means:
- a) Property Pipeline CRM – Customer Relationship Management system
 - b) Calendly – Automated Telephone call booking system
 - c) Paypal – Receive payment for services
 - d) Xero – Send Invoices for payment
 - e) Nimbox - File transfer system
 - f) Landmark – Electronic AML Customer Due Diligence system

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- 16.2 Where data subjects have given their consent to ROI to process their personal data in such a manner or the processing is otherwise required for the performance of a contract between ROI and the data subject, data subjects have the legal right under the Regulation to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers, e.g. other organisations).
- 16.3 To facilitate the right of data portability, ROI shall make available all applicable personal data to data subjects in the following format(s):
- 16.3.1 Exported data in csv file format;
 - 16.3.2 Access to ROI Registration Agreements, Documents & Forms via upon request, Google Drive shared access to file;
 - 16.3.3 Copies of ROI Registration Agreements, Documents or forms – Word Document(s) – Email or Nimbox (Data Owner choice).
- 16.4 Where technically feasible, if requested by a data subject, personal data shall be sent directly to another data controller.
- 16.5 All requests for copies of personal data shall be complied with within one month of the data subject's request (this can be extended by up to two months in the case of complex requests in the case of complex or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

17. Objections to Personal Data Processing

- 17.1 Data subjects have the right to object to ROI processing their personal data based on legitimate interests (including profiling), direct marketing (including profiling).
- 17.2 Where a data subject objects to ROI processing their personal data based on its legitimate interests, ROI shall cease such processing forthwith, unless it can be demonstrated that ROI's legitimate grounds for such processing override the data subject's interests, rights and freedoms; or the processing is necessary for the conduct of legal claims.
- 17.3 Where a data subject objects to ROI processing their personal data for direct marketing purposes, ROI shall cease such processing forthwith.

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18. Automated Decision-Making

- 18.1 In the event that ROI uses personal data for the purposes of automated decision and those decisions have a legal (or similarly significant effect) on data subjects, data subjects have the right to challenge to such decisions under the Regulation, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from ROI.
- 18.2 The right described in Part 18.1 does not apply in the following circumstances:
- The decision is necessary for the entry into, or performance of, a contract between ROI and the data subject;
 - The decision is authorised by law; or
 - The data subject has given their explicit consent.

19. Profiling

ROI does not use personal data for profiling purposes. If it did the following would apply:

- Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- Appropriate mathematical or statistical procedures will be used;
- Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling (see Parts 22 to 28 of this Policy for more details on data security).

20. Personal Data

The following personal data may be collected, held, and processed by ROI:

Contact Type	Data Collected	Purpose of Data
Client - Seller	Full Name, home address, D.O.B., email, contact telephone number, proof of identification, proof of address, proof of right to sell property or site and answers to questions re the sale of property or site.	<ul style="list-style-type: none"> Provide business service(s) Fulfil obligations under Money Laundering Regulations Receive payment for services provided (where applicable)

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Contact Type	Data Collected	Purpose of Data
Client – Buyer - Individual	Full name, home address, D.O.B., email, contact telephone number, proof of identification, proof of address, proof of funds, proof of source of funds and answers to questions re investment strategies and goals. Financial data.	<ul style="list-style-type: none"> • Provide business service(s) • Fulfil obligations under Money Laundering Regulations • Receive payment for services provided (where applicable)
Client – Buyer - Company	Full name, home address, D.O.B., email, contact telephone number, proof of identification, proof of address for any shareholders or controllers - Proof of funds, proof of source of funds and answers to questions re investment strategies and goals. Financial Data.	<ul style="list-style-type: none"> • Provide business service(s) • Fulfil obligations under Money Laundering Regulations • Receive payment for services provided (where applicable)
Professional Associate	Company name, contact name, email, contact telephone number & details of services provided or required.	<ul style="list-style-type: none"> • Communication • Provide business service(s)

21. Marketing Communications

You may receive marketing communications from Us if you have:

- Requested information, purchased goods or services from Us. Or
- Completed one of Our 'Contact Us' forms and ticked the box requesting information.
- Not opted out of receiving marketing from Us.

You can opt-out at anytime by emailing us at andy@roiproperty sourcing.com and typing STOP in the subject line.

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22. Data Protection Measures

- a) ROI shall ensure that all its employees, agents, contractors, or other parties working on its behalf comply with the following when working with personal data:
- b) No personal data is to be automatically sent via an email(s) system unless expressly requested by the data owner.
- c) All emails containing personal data must be marked “confidential”;
- d) Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded (in ROI office before recycling), and electronic copies should be deleted securely using ‘Shredder8’ (where held on Director(s) Laptop) or third party system deletion.
- e) Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
- f) Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- g) Personal data should not be transferred via email, however if this happens, whether sent or received, it should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted with ‘Shredder8’ (where held on Director(s) Laptop);
- h) Where Personal data is to be sent by facsimile transmission it should be marked as “confidential” and the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data;
- i) Where Personal data is to be transferred in hardcopy form it should be marked as “confidential” and passed directly to the recipient or sent using Royal Mail (receipt signature required) Postal Service;
- j) No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of ROI requires access to any personal data that they do not already have access to, such access should be formally requested from Andrew Murray (Director).
- k) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in the locked filing cabinet.
- l) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of ROI or not, without the authorisation of Andrew Murray (Director);
- m) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time;
- n) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it.

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Email: andy@roipropertiesourcing.com Telephone: 07792 499353

The Property Ombudsman (TPO) Registered Number: T11725

Information Commissioners Office (ICO) Registration Number: ZB831131

HMRC Anti-Money Laundering Supervision Registration Number: XZML00000204779

National Association of Professional Sourcing Agents (NAPSA) Member Number: 529

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23. Data Security - Storage

ROI shall ensure that the following measures are taken with respect to the storage of personal data:

- a) All electronic copies of personal data should be stored securely using an encrypted and password protected file on ROI Laptops.
- b) All hardcopies of personal data must be stored in the locked filing cabinet in the ROI office all electronic copies stored on physical, removable media should be stored in the locked, filing cabinet located in the ROI office.
- c) Personal data may be stored on a mobile device which must have a secure password system in place (including, but not limited to, laptops, tablets and smartphones), for the purpose of recording a copy of an original document to prove client identification, home address, proof of funds or proof of source of funds, and within 24 hours transferred to an encrypted and password protected desktop file and deleted from the device which captured the image, as well as any 'back up' files of data fulfilled in the time period since the image(s) were captured.
- d) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of ROI where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the Regulation (which may include demonstrating to ROI that all suitable technical and organisational measures have been taken);
- e) All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols.
- f) Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of ROI, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- g) Where personal data held by ROI is used for marketing purposes, it shall be the responsibility of Andrew Murray (Director) to ensure that no data subjects have added their details to any marketing preference databases including, but not limited to, the Telephone Preference Service, the Mail Preference Service, the Email Preference Service, and the Fax Preference Service. Such details should be checked at least annually.

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24. Data Security – Disposal

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. For further information on the deletion and disposal of personal data, please refer to ROI's Data Retention Policy below.

25. Data Security - Use of Personal Data

ROI shall ensure that the following measures are taken with respect to the use of personal data:

- 25.1 No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of ROI requires access to any personal data that they do not already have access to, such access should be formally requested from Andrew Murray (Director) – The Data Protection Officer - Email: andy@roiproperty sourcing.com ;
- 25.2 No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of ROI or not, without the authorisation of Andrew Murray (Director) – The Data Protection Officer – Email: andy@roiproperty sourcing.com ;
- 25.3 Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors, or other parties at any time;
- 25.4 If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it; and
- 25.5 Where personal data held by ROI is used for marketing purposes, it shall be the responsibility of Andrew Murray (Director) – The Data Protection Officer – Email: andy@roiproperty sourcing.com to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

26. Data Security - IT Security

ROI shall ensure that the following measures are taken with respect to IT and information security:

- 26.1 All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols.

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- 26.2 Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of ROI, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords.
- 26.3 All software (including, but not limited to, applications and operating systems) shall be kept up-to-date. ROI's Director's shall be responsible for installing any and all security-related updates as soon as reasonably and practically possible, unless there are valid technical reasons not to do so; and
- 26.4 No software may be installed on any Company-owned computer or device without the prior approval of Andrew Murray (Director) – The Data Protection Officer – Email: andy@roiproperty sourcing.com .

27. Organisational Measures

ROI shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- a) All employees, agents, contractors, or other parties working on behalf of ROI shall be made fully aware of both their individual responsibilities and ROI's responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy;
- b) Only employees, agents, sub-contractors, or other parties working on behalf of ROI that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by ROI;
- c) All employees, agents, contractors, or other parties working on behalf of ROI handling personal data will be appropriately trained to do so;
- d) All employees, agents, contractors, or other parties working on behalf of ROI handling personal data will be appropriately supervised;
- e) Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed;
- f) The performance of those employees, agents, contractors, or other parties working on behalf of ROI handling personal data shall be regularly evaluated and reviewed;
- g) All employees, agents, contractors, or other parties working on behalf of ROI handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract;
- h) All agents, contractors, or other parties working on behalf of ROI handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to

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the same conditions as those relevant employees of ROI arising out of this Policy and the Regulation;

- i) Where any agent, contractor or other party working on behalf of ROI handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless ROI against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

28. Transferring Personal Data to a Country Outside the EEA

ROI does not transfer any personal data to any country outside the EEA, unless:

- a) The transfer is made with the informed consent of the relevant data subject(s);
- b) The transfer is necessary for the performance of a contract between the data subject and ROI (or for pre-contractual steps taken at the request of the data subject);
- c) The transfer is necessary for important public interest reasons;
- d) The transfer is necessary for the conduct of legal claims;
- e) The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent; or;
- f) The transfer is made from a register that, under UK or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

29. Data Breach Notification

- 29.1 All personal data breaches must be reported immediately to ROI's Data Protection Officer (Andrew Murray).
- 29.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the data protection officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- 29.3 In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Protection Officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.

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29.4 Data breach notifications shall include the following information:

- a) The categories and approximate number of data subjects concerned;
- b) The categories and approximate number of personal data records concerned;
- c) The name and contact details of ROI's Data Protection Officer (or other contact point where more information can be obtained);
- d) The likely consequences of the breach;
- e) Details of the measures taken, or proposed to be taken, by ROI to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

30. Third Party Links

Our website may include links to 'third party websites', applications or plugins. By clicking on any of those links you are enabling those connections and that may allow third party websites to collect data about you.

We do not control those third-party websites and cannot be held responsible for their privacy policies. We advise that if you leave Our website, that you read privacy notices for all other websites that you may visit. For more information please refer to Our Data Retention Policy section later in this document.

31. Cookies

You are able to set your browser to refuse some or all cookies. You can also set to alert you when a website sets or adds cookies. If you disable or refuse cookies, some parts of Our website may become inaccessible or fail to function as meant to. You can gain more information about cookies at: [Wikipedia - Guide - HTTP Cookies](#). For more information, please refer to Our Cookie Policy section later in this document.

32. Implementation of Policy

This Policy shall be deemed effective as of 15th December 2024. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

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This Policy has been approved & authorised by:

Name: Andrew Murray

Position: Director

Date: 1st April 2025

Review Date: 31st March 2026

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