



DATA PROTECTION POLICY

1. Data protection principles

Nest Relocations is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes 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;
- 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 it is 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 GDPR in order to safeguard the rights and freedoms of individuals; and
- 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. General provisions

- a. This policy applies to all personal data processed by Nest Relocations.
- b. The Responsible Person ("a Data Protection Officer assigned by Nest Relocations") shall take responsibility for Nest Relocation's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. Nest Relocations is registered with the Information Commissioner's Office ("ICO") as an organisation that processes personal data, under reference number ZA431091.



3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, Nest Relocations shall maintain a Register of Systems in the form of a filing system.
- b. Nest Relocation's Register of Systems shall be reviewed at least annually.
- c. Data subjects shall have the right to access their personal data held by Nest Relocations via a Subject Access Request. Any such requests made to Nest Relocations shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data collected and processed by Nest Relocations shall be done so on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. Nest Relocations shall note the appropriate lawful basis in its Register of Systems[a1] and where the stated basis is legitimate interest Nest Relocations shall not use the personal data for any purpose other than that which has been formally notified to the ICO.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent shall be clearly available and systems shall be in place to ensure such revocation is reflected accurately in Nest Relocation's systems.

5. Data minimisation

- a. Nest Relocations shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- b. Should any personal data be obtained that is excessive or not specifically required for the legitimate purpose, Nest Relocations shall ensure that it is securely destroyed or delated.

6. Accuracy

- a. Nest Relocations shall take reasonable steps to ensure all personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date and no data shall be kept unless it is reasonable to assume that it is accurate.



7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Nest Relocations shall put in place an archiving policy for each area in which personal data is processed and shall review this process annually.
- b. The archiving policy shall consider the appropriate retention of records procedure, including what data should/must be retained, for how long, and why.
- c. Personal data will be minimised where retained beyond the processing date in order to protect the identity of the data subject.

8. Security

- a. Nest Relocations shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to authorised personnel who need access and appropriate security shall be in place to avoid the unauthorised sharing of information.
- c. When personal data is deleted this shall be done safely and securely such that the data is irrecoverable.
- d. Nest Relocations shall ensure that appropriate back-up and disaster recovery solutions are in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Nest Relocations undertakes to promptly assess the risk to people's "rights and freedoms" and in the event that these are adversely affected shall report such breach to the ICO.



PRIVACY POLICY

How your information is used by Nest Relocations

This Privacy Policy reflects Nest Relocations' obligation to be open and fair with all individuals whose personal data we process and to provide details around how we process personal data and what we do with it.

Nest Relocations is committed to safeguarding the privacy and security of personal data and complying with the European General Data Protection Regulation (2016/679) and any future changes in data protection legislation with which Nest Relocations shall be required to comply.

When using Nest Relocations' services, we process your personal data including, but not limited to name, address, contact details, email address and passport. Processing of this data implies collecting, storing, using and/or disclosing your personal data to relevant third parties (e.g. letting agents, referencing agencies, removal companies and others).

Definitions of Personal Data types: We use various forms of personal information

Contact: Where you live and how to contact you (including phone numbers and email addresses)

Consent: Any permissions, consent or preferences you give us, including how you would like us to contact you.

Contractual: Details of the services we provide to you.

Communications: What we learn about you from conversations, emails and letters between us.

Social Relationships: Your family and other relationships.

Documentary Data: Details about you that are stored in documents in different formats, including copies. This could include Passport, Visa, Utility Bills amongst others.

Socio-demographic: This includes details about your work or profession and nationality.

National Identifier: A number or code given to you by a government to identify who you are, such as your Passport Number or ID Card number.

Collecting Personal Data: We may collect and store the following kinds of personal data

- a) Information you provided to us via email, phone or text
- b) Information contained in or relating to any communication you send us through email, in writing or over the phone
- c) Information you provide to us when using any of our services or that is generated during the use of these services
- d) Information to help us comply with our legal and regulatory obligations, including reporting to and being audited by regulators and external auditors



- e) Information to help us comply with court orders and to exercise and defend our legal rights
- f) Any other information that might be sent to us and which we use for legitimate business purposes

Before you disclose to us the personal information of another person, you must obtain that person's consent to both disclosure and processing of that personal information in accordance with this Privacy Policy.

We may need to collect personal information by law. If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform the services needed to progress the Relocation process

Any data collection that is optional would be made clear at the point of collection.

Data to Third Parties we work with:

We may disclose all or some of your personal data to third parties we introduce you to (e.g. Letting Agents, Referencing Companies, Removal Companies amongst others). These third parties will only process your data on our instruction and upon having agreed to treat your data confidentially and securely.

Using Personal Data: We may use your personal information to

- a) Enable you to use services that we and third-parties provide
- b) Supply you with our services
- c) Send statements, invoices and payment reminders or collect payments
- d) Deal with enquiries and complaints
- e) Use tracing services to obtain onward contact details and collect any unpaid debts
- f) Comply with our legal and regulatory obligations

Disclosing Personal Data: We will only disclose your personal data in the ways set out in this Privacy Policy or subject to any agreements in place between us. The following circumstances may apply

- a) To third parties who process personal data on our behalf
- b) To third parties who process personal data on their own behalf but provide us, or you, with a service on our behalf
- c) To third parties with whom information is shared for anti-money laundering checks, credit risk reduction, debt collection and other fraud and crime prevention purposes
- d) To any regulator, external auditor or applicable body or court where we are required to do so by law or regulation or as part of any investigation
- e) To any central or local government department and other statutory or public bodies (i.e. HMRC)



- f) If the law or a public authority says we must share the personal data
- g) If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud or reducing credit risk)
- h) To any successors in title to our business

We do not sell, rent or trade any of your personal data

We will not, without your consent, disclose or supply your personal data to any third party for the purpose of their or any other third party's direct marketing

Retaining Personal Data: The following criteria are used to determine data retention periods for your personal data

- a) Retention in case of queries: we will retain your personal data as long as necessary to deal with your queries (i.e. if your potential transaction is unsuccessful)
- b) Retention in case of claims – we will retain your personal data for as long as you might legally bring claims against us
- c) Retention in accordance with legal and regulatory requirements – we will retain your personal data after your contract or service with us has come to an end based on legal and regulatory requirements

Securing Personal Data:

Where Nest Relocations acts as the controller of personal data, it will ensure that necessary and adequate safeguards are in place to prevent unauthorised access, loss, misuse or alteration of your personal data.

Where data is stored electronically we store all personal information on secure servers with relevant access and firewall controls.

We do not store data on paper.

Any personal data sent to us, either in writing or email, may be insecure in transit and we cannot guarantee its delivery.

Data Subject Rights: Your rights are as follows (noting that these rights don't apply in all circumstances)

- a) The right to be informed about our processing of your personal data
- b) The right to have your personal data corrected if it's inaccurate and to have incomplete personal data completed
- c) The right to object to processing of personal data
- d) The right to restrict processing of your personal data



- e) The right to have your personal data erased
- f) The right to request access to your personal data and information about how we process it
- g) The right to move, copy or transfer your personal data
- h) Rights in relation to automated decision making including profiling

Should you wish to exercise any of these rights please contact Nest Relocations on info@nestrelocations.com

Should you have any concerns you have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law: www.ico.org.uk

Third Party Websites

We are not responsible for the practices employed by Third Party Websites nor the information or content contained therein. Often links to other websites are provided solely as reference points to information on topics that may be useful you. Please remember that when you use a link to go to a Third Party Website, our Privacy Policy will no longer apply.

Right to Withdraw Consent

Where you have consented to Nest Relocations collecting, processing and transferring your personal data for a specific purpose, you have the right to withdraw your consent at any time. To withdraw consent please contact info@nestrelocations.com. Upon notification that your consent has been withdrawn we will cease processing of your information for that purpose.

Updates/Amendments

To remain compliant with any legal and regulatory obligations, or as part of our evolving business practices, we may update this Privacy Policy from time to time by publishing a new version