

Members Privacy Policy – December 2023

Privacy Policy Highlights

This section provides a brief overview on how we use your personal data in a business/professional capacity. For more information, please see our full <u>Member Privacy Policy</u>. If you use our services as a consumer, please see our <u>Consumer Privacy Policy</u>.

Who we are

This privacy policy covers Rightmove plc and any of our subsidiary companies under section 1159 companies act 2006 which include Rightmove Group Limited, Rightmove Landlord and Tenant Services Limited, Rightmove Financial Services Limited. We are the providers of the Rightmove mobile application software and the websites

www.rightmove.co.uk, https://hub.rightmove.co.uk/, https://rmplusportal.rightmove.co.uk and https://plc.rightmove.co.uk/ and https://rentalservices.rightmove.co.uk/

Personal data collected

Categories of personal data: in the course of our business relationship the following data may be collected, processed and stored:

- Correspondence and contact data (e.g. name, address, telephone, email address, job title, username, telephone and online meeting recordings, meeting notes).
- **Technical data** (e.g. IP address, website logs, login information, usage of our sites and services, browser type, operating systems, browser plug-in types, version and audit history).
- **Contract data** (e.g. billing and payment data, order form data, products requested, signature, audit history).
- Vetting data (e.g. government issued ID, whether you feature on a politically exposed persons
 or sanctions list, proof of ownership of a property/business, any court or civil hearings, media
 coverage).
- **Events and qualification data** (e.g. courses taken, events attended, exams taken, special exam requirements).

Sources of personal data: we process personal data that we receive from:

- you (or your colleagues) in the course of our business relationship.
- publicly accessible sources (e.g. registers, press, media, Internet, government issued sanction lists)
- credit reference agencies and fraud prevention agencies.

Purpose and Lawful basis: we rely on performance of contract, legitimate interests and legal obligations to process your personal data in order to:

- provide the service to you and manage your account.
- operate our business and perform our contract with your business.
- keep our site safe and secure.
- customise and enrich your experience.
- meet our regulatory requirements such as verifying our members, checking for sanctions, and politically exposed persons.
- improve our sites and services.



• to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

How long we keep it for: we process and store your personal data for as long as it is necessary for the fulfilment of our contractual and legal obligations and for our legitimate interests. We will retain contractual data for up to 7 years from the termination of membership.

Automated decision making and profiling

We do not undertake any automated decision making. We may profile your use of our services and platforms to customise and tailor our communications with you, and keep you updated on services that may be of interest to you.

Sharing of your data

We share personal data between our subsidiaries and our third-party data processors (e.g. telephony, payment, communications, technology, insurers, exam providers and system providers) in order to fulfil our contractual obligations or where we have a legitimate interest to do so in order to provide the services.

We may be legally required to disclose personal data to our Auditors, HMRC or information relevant to an investigation or legal proceedings from a regulatory, governing, or legal body.

Direct marketing and communications

We have a legitimate interest to contact you regarding your business membership of Rightmove, to perform your contract, provide a service to you and keep you updated on important announcements or service alerts. Sometimes we may use your personal data to provide direct marketing messages to you regarding your business. You can opt out of direct marketing at any time.

Transfer of data outside the EEA

We predominantly store and process personal data within the EU. However some of the personal data that we collect may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") or areas which do not have an adequacy agreement. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or contractors. Territories outside of the EEA may not have equivalent legal protections to those that apply within the EEA, but we are under a duty to make sure that our suppliers and contractors located outside of the EEA continue to take all steps reasonably necessary to ensure that your data is treated securely such as standard contractual clauses and appropriate organisational and technical measures. We will use Standard Contractual Clauses and/or the UK-US Data Bridge for transfers to the United States of America.

By submitting your personal data to us, you agree to this transfer, storing or processing.

Security

Once we have received your information, we will use procedures and security features to help prevent unauthorised access. We follow security procedures to help ensure that your personal data is not damaged, destroyed or disclosed to a third party without your permission and to prevent unauthorised access to it.

Your rights

You have the right to request access to your personal data, to have it deleted, rectified or to restrict/object to the processing of your personal data (including profiling and automated decision making) or request we transfer your data to another third-party controller. To exercise your rights please contact our Data Protection Officer/Team on dpo@rightmove.co.uk



You have the right to complain to the Information Commissioner's Office if you feel unhappy with the way we process your personal data. Please visit www.ico.org.uk for more information.

Cookies and tracking

We use cookies and other similar technologies to personalise your visits to our platforms, simplify the signing-in procedure, keep track of your preferences and to track the usage of our platforms. We use a mixture of third and first-party cookies. For full details about what cookies we set and why we use them, please see our Cookie Policy available here.

Contacting us

If you have any questions about this policy or our use of your personal data or would like to submit a subject access request or exercise your other data subject rights, please contact our Data Protection Officer/Team via email at dpo@rightmove.co.uk or please write to The Data Protection Officer, Building 2, Caldecotte Lake Business Park, Milton Keynes, MK7 8LE.

Full Member Privacy Policy

WHO WE ARE

This Privacy Policy covers Rightmove PLC and any of Our subsidiary companies under Section 1159 Companies Act 2006 (referred to as "We" or "Us" or "Our" or "Rightmove"). These include:

- Rightmove PLC, registered in England number 06426485. Registered office address is Building 2, Caldecotte Lake Business Park, Milton Keynes, MK7 8LE, VAT number is 918501823.
- Rightmove Group Limited, registered in England number 03997679. Registered office address: is Building 2, Caldecotte Lake Business Park, Milton Keynes, MK7 8LE. VAT number is 918501823. Rightmove Group Limited (FCA Firm Reference Number 491645) is also an appointed representative of Rightmove Landlord and Tenant Services Limited and Rightmove Financial Services Limited, which are authorised and regulated by the Financial Conduct Authority (FCA) Firm Reference Numbers 522050 and 805415. This can be checked on the FCA register at (www.fca.org.uk/register).
- Rightmove Landlord and Tenant Services Limited which is authorised and regulated by the Financial Conduct Authority (FCA) Firm Reference Number 522050. This can be checked on the FCA register at (www.fca.org.uk/register). Registered in England number 7064255.
 Trading office address: Suites 12 and 13, Part Ground Floor, Neon, Q10 Quorum Business Park, Benton Lane, Newcastle Upon Tyne, NE12 8BU. Registered office address: 2 Caldecotte Lake Business Park, Caldecotte Lake Drive, Milton Keynes, England, MK7 8LE. VAT number 100838839.
- Rightmove Financial Services Limited which is authorised and regulated by the Financial Conduct Authority (FCA) Firm Reference Number 805415. Registered in England number 11211259. Registered office address: Building 2, Caldecotte Lake Business Park, Milton Keynes, MK7 8LE. VAT number 918501823.

We are the providers of the Rightmove mobile application software (referred to as the "App") and the websites www.rightmove.co.uk, https://hub.rightmove.co.uk/, https://plc.rightmove.co.uk/ (referred to as the "Site") (together referred to as "Our Platforms") and any other Services We may operate in the future.



"Members" include estate agents, commercial agents, letting agents, managing agents, landlords, new homes developers, housing associations, overseas property owners, Build to Rent developers, surveyors, banks, building societies, insurance companies, other lenders and financial institutions, Government departments, executive agencies, quangos, academia institutions, and selected CRM software providers.

"Services" or "Service" include property advertising, insurance and tenant related services (which includes tenant referencing, rent guarantee insurance, landlords' contents and/or liability insurance, tenant's contents and/or liability insurances, utilities and broadband), stamp duty land tax calculator, valuation and surveying tools and financial services (which includes mortgage in principle decision and mortgage calculator), training courses and exams, branch and property performance analysis.

A reference to "You" or "Your" or "Yourself" is a reference to being a Member and using Our Platforms and Services as part of Your commercial relationship with Us.

We provide Our Platforms to our Members to access Services where relevant to Your membership with Us:

- Advertise properties on Our Platforms and reach Our online audience.
- Access tools to monitor performance of property and branch advertising.
- Use Our valuation and surveying tools.
- Access training, educational content, and exams.
- Access reference and insurance services.

CONTACTING US

We recommend You contact Us via email. If You prefer to correspond with Us via post, there may be a delay in Us receiving and responding to Your postal enquiries and therefore email correspondence is recommended for a quicker response.

If You have any questions about this Policy, Our use of Your personal data, like to stop receive direct marketing from Us or would like to submit a subject access request or exercise Your other data subject rights, please contact Our Data Protection Officer/Team via email at dpo@rightmove.co.uk or please write to The Data Protection Officer, Building 2, Caldecotte Lake Business Park, Milton Keynes, MK7 8LE.

INTRODUCTION

We are committed to protecting Your privacy. This privacy policy (referred to as the "Policy") explains how and for what purposes we use the information collected about you in a professional capacity only. If You are interested in how We use Your personal data when You visit Our Platforms as a consumer, please go to our <u>Consumer Privacy Policy</u> and <u>Cookies Policy</u>.

Please read this Policy carefully.

WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?



What we collect and where it comes
from

- In the course of providing Our Services to You, We collect Your full name, any name You prefer to be known as, email address, role/job title, username or similar identifier, branch address, company address, telephone numbers and mobile numbers, IP address and logs of Your activity on any of Our Platforms.
- When You enquire about joining Rightmove, or We review Your existing Membership with Us and You provide Us (or Our third party suppliers) with details about You, Your government issued ID, Professional Indemnity, evidence of mandatory training completed and confirmation of any court or civil hearings (where required) and how You conduct Your business so We can assess Your suitability for membership with Us.
- Personal data is provided either by You or a nominated representative of Your business when You:
 - o become a Member of Rightmove.
 - correspond with Rightmove about the membership Services We provide to You or Your business.
 - o request a RightmovePlus account for each user.
 - o submit an enquiry form to Us via the Sites.
 - o create a Rightmove Hub account.
 - attend/register for webinars, seminars and other events.
 - register and take courses, qualifications and exams that We provide.
- When You provide Your business bank details for the purposes of taking payment for the Services We provide.
- You, or Your nominated representative may provide the following to Us which may feature You in Your:
 - advertisements or pictures to promote
 Your office, services or branch staff.
 - o videos for online property viewings.
 - o virtual tours of properties.
 - on Our Platforms.
- Where a homemover contacts You using the telephone number on Our platforms, calls may be recorded between You and the homemover.
- Personal data that You provide to Us when We correspond by telephone, e-mail, video calls, post, direct messaging or tweets through social media or otherwise.
- If You register for Our exams or qualifications, You will provide us Your date of birth, gender and any additional learning needs You may have.

	If You provide a reference to Us for a tenant, please see Our Consumer Privacy Policy for how we use Your personal information.
Why we collect it	We will use this information for several reasons relevant to Your membership with Us including:
	 to provide the Services to Your company. to enable Your business to advertise properties and services to Our online audience. to enable Your business to access valuation and surveyor comparable tools. to process and resolve any queries that You may have concerning Your Rightmove membership. to communicate with You about Our Services and updates about Rightmove membership terms and guidelines. to customise and enrich Your experience on Our Sites. to administer and protect Rightmove and the Sites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). to contact You for Your views on Our Services and to notify You about important changes to this Policy, Our terms, guidelines or developments to Sites or Our Services. for training, monitoring and quality assurance purposes and performance of contract where calls are recorded. for fulfilling Our contract with You. to enable You to attend events hosted or sponsored by Rightmove. to enable You to take Our courses, exams and qualifications. to help keep Our site secure, such as 2 factor authentication.
Our lawful basis for processing this personal data	We rely on performance of contract and legitimate interests to process your personal data to:
	 provide the Service to assist You to: market or value properties. identify and assess valuation opportunities. advertise properties or services to potential purchasers, tenants, vendors or landlords. provide a referencing and insurance service. to operate Our business and manage Your account. to gain information about the use of Our Sites and Services and any improvements that can be made. Where Your personal data is held in relation to a Rightmove membership agreement and related financial transactions,

cont	basis for processing that data is to perform Our ract with Your business or for legal reasons, such as accounts and HMRC returns or meeting Our latory obligations.
	Company or business records, contracts and customer relationship management information: 7 years from the date Your Rightmove membership ends. Rightmove Hub: 12 months from deactivation of Your registration. RightmovePlus account: 3 months from deactivation of Your account or where Your account has been inactive. Webinar registration: 12 months after last activity. Emails between Rightmove and You: are kept for a minimum of 2 years and a maximum of 7 years (depending on the business requirement). Webinars and events: 12 months from the event date. Call recordings or recorded virtual meetings between Rightmove and You 18 months from the date of the recording except where recordings are between You and Rightmove Landlord and Tenant Services Limited, in which case these will be retained for 3 years. Call recording between You and home movers: 3 months from the date of the recorded call. Property brochures, advertisements, etc: we retain this data indefinitely as part of the property listing record. However if You have used Our online viewing Vimeo service, then the video will be deleted 30 days after the property is sold or let and the property advertisement has been archived. Qualification data: this will be retained for 6 years.

INFORMATION WE COLLECT ABOUT YOU

What we collect and where it comes from	This is different to "information You give Us" because it relates to technical data that We collect via Our Sites or systems. We may:	
	Collect technical information that has the potential to identify You, including the type of Device You use, a unique identifier (for example, Your Device's IMEI number), the internet protocol (IP) used to connect Your computer to the internet, the MAC address of the Device's wireless network interface, or the mobile phone number, Your login	



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	by the Device, mobile network information, Your Device operating system, the type of browser You use on Your Device and its time zone setting, the browser plug-in types and versions, operating system and platform; browser type and version and Your login data. • Collect personal data about Your visit to Our Platforms and/ or Your interactions with Our direct marketing and other communications using tracking pixels to identify device types, open rates and click through information, the full Uniform Resource Locators (URL) clickstream to, through and from Our Platforms (including date and time), products You viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page and how You use Our Platforms, products or Services. • Collect details of Your use of Our App or Your visits via the App, the resources that You access and the advertisers and partners that You contact. • Use GPS technology on Your Device to determine Your current location. Some of Our location-enabled services require Your personal data for the feature to work. • Combine technical information with other information that We have about You to help Us with Our processing of Your personal data as set out in this Policy. • Mystery shopping which consists of emails and phone calls to You from Rightmove employees. • Information required to screen individuals in Your business such as directors, officers, sole traders or persons with significant control. This screening takes place against publicly available, or government issued sanctions lists and media sources or via third party suppliers.
Why we collect it	We will use the information summarised above to:
	 provide the Sites and Services to You. conduct reviews that help Us improve and optimise Our
	Sites.
	ensure that content from Our Sites is presented in the
	most effective manner for You and for Your device.
	 administer Our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
	 to help keep Our Site safe and secure.
	to customise and enrich Your experience on Our Site.
	 to conduct mystery shopping in order to provide You with
	insights on how Your business handles the leads that are

sent from Rightmove and/or to establish the fact/suitability of Your Rightmove membership.

	 to ensure You can meet Our vetting requirements and comply with regulatory obligations. The screening does not result in any automated decision making.
Our lawful basis for processing this personal data	We have a legitimate interest to process this information. These legitimate interests are to:
	 help ensure the on-going security of the Platforms. enhance the service that You receive on the Platforms. provide information necessary to enable Us to provide competitive, cost effective Services. provide customer support including dealing with Your complaints, enquiries and to improve customer service. monitor quality and conduct staff training. to study how Our Platforms are used, including how Our Services are used, to develop them, to develop and grow Our business, to inform Our marketing strategy, to define types of customers for Our Services and to keep Our Platforms updated and relevant. to operate Our business and Platforms (troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data, provision of administration and IT services, network security and to prevent fraud). to ensure compliance with Our membership terms and conditions.
	We have a legal obligation to process vetting information in order to comply with regulatory obligations.
How long we will keep it for	 We will store this personal data for 2 years (or 3 years for services performed under Rightmove Landlord and Tenant Services Limited) to allow Us to review and monitor normal traffic patterns and trends on the Sites. After which, this data will be kept in an anonymous form. We will store web server logs which contain personal data about Your activity on Our Platforms for up to 14 days (with the exception of Rightmove Landlord and Tenant Services, in which case this will be retained for 3 years). Information We receive regarding direct marketing and other communications will be retained for no longer than 2 years.
	Non-technical data We may store this for up to 7 years from the termination of Your membership.

INFORMATION WE RECEIVE FROM THIRD PARTIES

From time to time third parties may share personal data about You with Us.

Who shares data with us	Reason they share this with us



Property Redress Schemes	They will share details of any membership that has been elapsed or expelled. The purpose is to ensure only Members who are required to have an active membership of a government recognised redress schemes can continue to advertise on Our Platforms.
Includes Regulators/Police/	During an investigation or legal proceedings, they may share details
Trading Standards/ HMRC/	with Us so We can respond to their lines of enquiry/formal
Solicitors etc.	investigations. These cases are confidential and We would not
	normally notify You of such a request.
Market Research Agencies	Where You have participated and agreed, market research agencies
	appointed on Our behalf will share with Us the results of the market
	research.
Datafeed and CRM Suppliers	It may be necessary for Your appointed Datafeed or CRM
	Provider(s) to share information with Us in order that We can
	provide the Services to You.
Vendors/Landlords/Buyers/	From time to time We are contacted directly by consumers. They
Tenants/Enquirers/Users of	may disclose to Us information about You when raising a query or
Our Sites	complaint with Us.
Credit Reference	To ensure You can meet Our vetting requirements and legal
Agencies/Fraud Prevention	obligations.
Agencies/ Agencies who can	
check ID, Politically Exposed	
Persons and Sanctions.	
Training and Qualification	To provide results and details of any qualifications/ exams/ training
Providers	You take with Us in order We can provide the Services to You.

INFORMATION WE SHARE WITH THIRD PARTIES

From time to time it may be necessary to share information with third parties in order to fulfil Our legal obligations, to fulfil Our service to You or under Our legitimate interests.

Who we share data with	What we share and reason for sharing
Includes Regulators/Police/ Trading Standards/ Property Redress Schemes/ HMRC/Auditors/ Solicitors etc.	Where We are legally required to disclose financial information to Our auditors, HMRC or information relevant to an investigation from a regulatory/ governing or legal body or where We are launching legal proceedings.
Fraud Prevention Agencies	Personal data You have provided to Rightmove may be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify Your identity. If fraud is detected, You could be refused certain services, finance, or employment. For further details of how Your information will be used by Rightmove and these fraud prevention agencies, and Your data protection rights can be found by visiting https://www.cifas.org.uk/fpn.
Market Research Agencies	From time to time We evaluate the Services We provide and engage third party market research agencies to contact You on Our behalf to gather feedback to help improve the service We provide Our Members. We will typically share limited personal data such as a decision maker's name, email address, contact number and company/branch address.

	We have strict data sharing and processing agreements in place with our appointed market research agencies, the personal data is retained by them for a very limited time and they do not retain that information after completion of the research.
Email Marketing System	From time to time We may use an e-marketing platform that enables Us to communicate to all Our Members about important updates relating to their Rightmove membership.
	We will typically use an individual's name, email address and company/branch details. This is only accessible to a small number of Rightmove staff and not by the email marketing providers without prior permission from Us, only for the purpose of resolving an issue and permissions are revoked upon resolution.
	We retain this information for 13 months in Our E-marketing system.
Customer Relationship Management and Communications	When You become a Member of Rightmove, a customer record is created. This information is provided by You or a nominated representative of Your business.
Systems	In the course of communicating with Rightmove, Your name, email address and telephone number may be added to Our systems in order to provide the Services to You and keep You updated.
	We will also use the systems to provide tailored communications to You and to communicate to Our Members about important updates relating to their Rightmove membership.
	Information, together with any related Member notes, will be retained in Our systems for as long as Your business is a Member of Rightmove and for 7 years after Your Rightmove membership ends.
Customer Services Ticketing System and One to One Communication	When You contact Us via email, online chat or telephone, Your personal data may enter into Our ticketing system. This allows Us to manage and respond to Your query.
	Full details of the 'ticket' which includes Your reason for contact, resolution, any personal data You have shared with Us such as name, email address and telephone number are retained for 18 months after which they are deleted (or 7 years depending on business requirements).
Debt Recovery Agencies	Should We not receive full payment of Your membership, We may transfer Your debt to a debt collection agency in accordance with Our General Membership Terms and Conditions
	We will share an owner's/director's name, email address, telephone and mobile numbers, any business addresses We have on Our system and details of the debt.
Telephone Call Recording (between You and Rightmove)	When You speak to Us Your calls may be recorded for training, monitoring and quality assurance purposes and to fulfil Our contract with You. Any calls We record, are retained for a maximum period of

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	18 months (or 3 years when You call Rightmove Landlord and Tenant Services Limited).
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Telephone Call Recordings	If an authorised representative of Your company has signed up to
(between You and	Our telephone recording service, all telephone lead enquiries
consumers	generated via the Rightmove website are recorded for training,
via the Rightmove Sites)	monitoring and quality assurance purposes. These telephone
	recordings will be retained for no longer than 3 months. You can
	view more details in our <u>Consumer Privacy Policy</u> .
Subject Access Requests	Where We receive a request for disclosure of personal data under a
under General Data	Subject Access Request, We will only provide data in response to
Protection Regulations	that Data Subject request. Where possible or appropriate We may
	redact any personally identifying information relating to You.
Datafeed Providers	We may pass Your data onto Your appointed Datafeed provider
	when it is necessary in order to provide a Service to You. We will
	only share Your data with Your appointed Datafeed provider.
Vendors/Landlords/Buyers/	From time to time, We are contacted directly by consumers
Tenants/Enquirers/	regarding a complaint or concern. We may need to disclose Your
Users of Our Sites	, ,
Osers of Our Sites	data to resolve a complaint, address a concern or re-direct an
Drintoro manisatina and	enquiry back to You.
Printers, marketing and	From time to time We may write to You about Your membership,
distribution agencies	invoices for the Services We provide or You may request point of
	sale material from Us. We appoint printers, marketing and
	distribution agencies to process, print and dispatch on Our behalf
	and only share data necessary for the purpose of the
	communication or delivery of the point of sale. Personal data which
	can be typically included are decision maker name and
	correspondence address (usually branch or head office address). We
	have strict data processing agreements with Our appointed
	agencies, who only retain the data for as long as necessary to
	provide the service.
Screen Sharing and	From time to time, it may be necessary for Us to share Our screens
Virtual Meeting Suppliers	with You, or vice versa, either to provide training to You or to
Thread Treeting Cappilers	resolve a query You may have. We will always ask Your consent to
	screen share and You will be prompted by the screen sharing
	, , ,
	software to consent to sharing. These sessions may be recorded,
	and You will be notified at the time if that is the case.
	Recorded sessions and transcripts may be retained for 18 months
	from the meeting date.
Billing Systems and	To process Our invoices and provide Services to You We use
Payment Providers	systems to process payments.
	This records direct debit details, accounts payment details, name
	and contact details of the person paying Your invoices.
	This data is stored for 7 years from the termination of membership.
Electronic Signing Systems	We use e-signing systems to allow You to remotely complete and
	sign membership or product request forms, direct debit forms,
	forms to change Your membership type or Services, or to create a
	tenancy agreement.
	teriality agreement.



	This data is stored for 7 years from the end of Rightmove membership.
Event Management Systems and Suppliers	From time to time We may use third party event management systems and suppliers to manage event registrations on Our behalf or for analytical purposes which help improve Our Services This data is stored for 12 months from the event date.
	This data is stored for 12 months from the event date.
Rightmove Hub Suppliers	We use external third parties to enable Us to host and provide content and Services to You, including analytics to help Us improve the Service We provide You.
	This data is stored for 12 months from deactivation of your Rightmove Hub user account.
SMS	We use an external party to deliver SMS communications for marketing and service communications and for security reasons to protect Your RightmovePlus account.
Translation/ Transcription providers;	Where necessary We may use translation and transcription service providers in order to process a query or communicate with You.
IT, Hosting and Network providers	We use external third parties to enable Us to host, support Our Platforms and provide content and Services to You, including analytics to help Us improve the Service We provide You.
E-calendar Providers	Where You take our Viewings Manager product, We share details in order for You to create a calendar invite for a viewing.
Training and Qualification Providers	In order we can provide the training/qualifications and exams to You.
Credit Reference Agencies / Agencies who can check ID, Politically Exposed Persons and Sanctions.	To ensure You can meet Our vetting requirements and legal obligations.

PROFILING

We may profile Your activity when using Our Services or Platforms. This profiling is based on Your usage and interaction with RightmovePlus and the Hub, Your attendance at events and webinars, participation in Our courses and exams and interactions with Our communications.

We may use this information to:

- Provide branch managers, owners and directors:
 - o an overview of Your usage of reports in RightmovePlus and Services We offer.
 - o identify opportunities to improve training.
- customsie Our communications to You.
- use this information to customise Your experience on Our Platforms such as suggesting Services:
 - o that may be of interest to You;
 - o from Our third-party advertisers that may be relevant and of interest to You based on Your use of Our Platforms.



Any profiling data that We hold about You will only be kept for as long as is required to perform the Services to Our Members and provide Our Platforms and Services to You.

USE OF YOUR PERSONAL DATA FOR DIRECT MARKETING AND OTHER COMMUNICATIONS

Business to Business Communications

We have a legitimate interest to contact You regarding Your business membership of Rightmove, to:

- perform Your contract.
- provide Services to You.
- keep You updated on important announcements or service alerts.
- keep You informed of services/products that are available to You.

Business to Business Marketing

Sometimes We may use Your personal data to provide direct marketing messages to You regarding Your business. You can opt out of direct marketing at any time by:

- managing Your preferences in your Hub account.
- using the unsubscribe links located at the bottom of the direct marketing emails We send You.
- Contacting Us directly on <u>talk-to-us@rightmove.co.uk.</u>

SPECIAL CATEGORY DATA AND CRIMINAL OFFENCE DATA

We only collect and process this type of data in the following circumstances:

- To screen and vet Our current and future Members (e.g. Government issued ID which may indirectly reveal ethnicity, confirmation from You that You have no Criminal or Civil court hearings and whether You appear on any Politically Exposed Persons or Sanction lists).
- Additional learning needs when registering for an exam. You may choose to disclose additional learning needs to the examination centre for the purpose of making special exam arrangements where required.

We only keep this information for as long as is necessary. We employ appropriate technical and organisational measures to ensure Your personal data is secure.

WHO HAS ACCESS TO YOUR PERSONAL DATA?

If Our business is sold or merged, or if We sell or buy any business or assets, We may disclose Your personal data to the prospective seller or buyer of such business or assets. We will make sure that any such transfer is done in a secure way.

If We offer or supply a Service to You that is provided on Our behalf by a third party, We may have to pass Your personal data to them in order to deliver the Service. The categories of third parties (who are acting as data processors which means they are responsible for processing personal data on behalf of Us) are detailed in the 'Information We share with third parties' section.

We will disclose Your personal data to other third parties if We are under a duty to disclose or share Your personal data to comply with any legal or regulatory obligation or request. This includes exchanging personal data with other companies for the purposes of fraud prevention and credit risk reduction.



WHERE DO WE STORE YOUR PERSONAL DATA?

We predominantly process personal data in the European Economic Area ("EEA"). However, we may transfer, store or process Your personal data at a destination outside the EEA. It may also be processed by staff operating outside the EEA who work for Us or for one of Our suppliers or contractors. Territories outside of the EEA may not have equivalent legal protections to those that apply within the EEA, but We are under a duty to make sure that Our suppliers and contractors located outside of the EEA continue to take all steps reasonably necessary to ensure that Your personal data is treated securely and in accordance with this Policy. We will use Standard Contractual Clauses and/or the UK-US Data Bridge for transfers to the United States of America.

By submitting Your personal data to Us, You agree to this transfer, storing or processing. Unfortunately, the transmission of information via the internet is not completely secure. Although We will do Our best to protect Your personal data, We cannot guarantee the security of Your data transmitted to our Site; any transmission is at Your own risk.

Once We have received Your information, we will use procedures and security features to try to prevent unauthorised access. We follow security procedures to help ensure that Your personal data is not damaged, destroyed or disclosed to a third party and to prevent unauthorised access to it.

The servers and cloud-based technology that store the information are kept in a secure facility with restricted physical access and We use secure firewalls and other measures to restrict electronic access. If We are working with third parties, We will require them to have in place similar measures to protect Your information. Only employees who need access to Your information to perform a specific job are granted access to personally identifiable information.

We may require you to co-operate with Our security checks before We disclose information to You. You can update the personal data that You give Us at any time by viewing Your account in Our Platforms. Where We have given You (or where You have chosen) a password which enables You to access certain parts of the Sites, You are responsible for keeping this password confidential. We ask You not to share Your password with anyone.

YOUR RIGHTS

For personal data you have provided to Us as a consumer, please visit our Consumer Privacy Policy

For personal data pertaining to Your Rightmove membership, You have the right to:

- request access to or rectification of the personal data which We hold about You.
- request erasure of Your personal data in certain circumstances.
- restrict the processing of Your personal data.
- object to or restrict Our processing of Your personal data in certain circumstances.
- request that We transmit Your personal data to another data controller.

Please note that commercial membership data held for contractual, tax or financial purposes may not be subject to deletion/rectification. We rely on legitimate interests and performance of contract to process Your data, therefore by exercising these rights, this may limit Your access to or use of Our Services in a commercial capacity.

To exercise any of these rights, please contact the Data Protection Officer whose contact details are provided at the end of this Policy.

You have the right to complain to the Information Commissioner's Office if You feel unhappy with the way We process Your personal data. Please visit https://ico.org.uk/ for more information.



Please visit Our Consumer Privacy Policy and Cookie Policy for more information.

CHANGES TO THIS POLICY

Any changes We may make to this Policy in the future will be posted on this page and You will be notified by email or via Our Platforms where the changes are material. Please check back frequently to see any updates or changes to this Policy, as You will be deemed to accept such changes from Your continued use of Our Platforms.

CONTACTING US

If You would like to stop receiving direct marketing from Us please contact us via email at <u>talk-to-us@rightmove.co.uk</u> or please write to the Customer Services Team, Building 2, Caldecotte Lake Business Park, Milton Keynes, MK7 8LE.

If you would like your RightmovePlus or Hub account to be deactivated or data contained within your account to be removed, or have any queries about RightmovePlus or the Hub, please contact us via email at customer.support@rightmove.co.uk or write to the Customer Services Team, Building 2, Caldecotte Lake Business Park, Milton Keynes, MK7 8LE.

If You have any questions about this Policy or Our use of Your personal data or would like to submit a subject access request or exercise Your other data subject rights, please contact Our Data Protection Officer via email at dpo@rightmove.co.uk or please write to The Data Protection Officer, Rightmove Group Limited, Building 2, Caldecotte Lake Business Park, Milton Keynes, MK7 8LE.

Issued: 18 December 2023

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