

**PRIVACY POLICY FOR PHOENIX APARTMENTS LIMITED**  
**(<http://www.phoenixapartments.co.uk>)**

We are committed to safeguarding the privacy of our website visitors; this policy<sup>1</sup> sets out how we will treat your personal information.

**(1) What information do we collect?**

We may collect, store and use the following kinds of personal data:

- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type, referral source, length of visit and number of page views)
- (b) information relating to any transactions carried out between you and us on or in relation to this website, including information relating to any purchases you make of our goods or services.
- (c) information that you provide to us for the purpose of registering with us (including name, email address, telephone number and contact postal address).
- (d) information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters (including name, email address, telephone number and contact postal address]
- (e) any other information that you choose to send to us

**(2) Cookies**

A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may use both "session" cookies and "persistent" cookies on the website. We will use the session cookies to: keep track of you whilst you navigate the website. We will use the persistent cookies to: enable our website to recognise you when you visit.  
[Session cookies will be deleted from your computer when you close your browser.]  
[Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.]

[We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.]

Our advertisers/payment services providers may also send you cookies.

Most browsers allow you to refuse to accept cookies. (For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector.) This will, however, have a negative impact upon the usability of many websites, possibly including this one.

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### **(3) Using your personal data**

Personal data submitted on this website will be used for the purposes specified in this privacy policy or in relevant parts of the website.

We may use your personal information to:

- (a) administer the website;
- (b) improve your browsing experience by personalising the website;
- (c) enable your use of the services available on the website;
- (d) send to you goods purchased via the website, and supply to you services purchased via the website;
- (e) send statements and invoices to you, and collect payments from you;
- (f) send you general (non-marketing) commercial communications;
- (g) send you email notifications which you have specifically requested;
- (h) send to you our newsletter and other marketing communications relating to our business [or the businesses of carefully-selected third parties] which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications by emailing [info@phoenixapartments.co.uk](mailto:info@phoenixapartments.co.uk))
- (i) provide third parties with statistical information about our users – but this information will not be used to identify any individual user;
- (j) deal with enquiries and complaints made by or about you relating to the website; and

Where you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

All our website financial transactions are handled through our payment services provider, Paypal. You should only provide your personal information to Paypal after reviewing the Paypal privacy policy (available at [www.paypal.com](http://www.paypal.com)). We will share information with Paypal only to the extent necessary for the purposes of processing payments you make via our website and virtual terminal. We do not store credit card details nor do we share customer details with any 3rd parties

### **(4) Disclosures**

We may disclose information about you to [any of our employees, officers, agents, suppliers or subcontractors] insofar as reasonably necessary for the purposes as set out in this privacy policy.

In addition, we may disclose information about you:

- (a) to the extent that we are required to do so by law;

- (b) in connection with any legal proceedings or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); and
- (d) to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling.

Except as provided in this privacy policy, we will not provide your information to third parties.

#### **(5) International data transfers**

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy.

If you are in the European Economic Area (EEA), information which you provide may be transferred to countries (including the United States, Japan,) which do not have data protection laws equivalent to those in force in the EEA.

In addition, personal information that you submit for publication on the website will be published on the internet and may be available, via the internet, around the world.

You expressly agree to such transfers of personal information.

#### **(6) Security of your personal data**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure (password- and firewall- protected) servers. All electronic transactions you make to or receive from us will be encrypted [using SSL technology].

Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping your password and user details confidential. We will not ask you for your password.

#### **(7) Policy amendments**

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

We may also notify you of changes to our privacy policy by email.

#### **(8) Your rights**

You may instruct us to provide you with any personal information we hold about you. Provision of such information may be subject to the payment of a fee (currently fixed at £10.00).

You may instruct us not to process your personal data for marketing purposes by [email](#) at any time. (In practice, you will usually either expressly agree in advance to our use of your personal data for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal data for marketing purposes.)

#### **(9) Third party websites**

The website may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

#### **(10) Updating information**

Please let us know if the personal information which we hold about you needs to be corrected or updated.

#### **(11) Contact**

If you have any questions about this privacy policy or our treatment of your personal data, please write to us by email to [info@phoenixapartments.co.uk](mailto:info@phoenixapartments.co.uk) or by post to Phoenix Apartments Ltd, 2 Arnhem Road, Newbury, Berkshire RG14 5RU.

#### **(12) Data controller**

The data controller responsible for our website is Phoenix Apartments Limited.