



Consumer Privacy Policy

movebutler

Consumer Privacy Policy

This privacy policy aims to give you information on how we collect and process your personal data through your use of **movebutler**, including any data you may provide through **movebutler** through account with us.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. **IMPORTANT INFORMATION AND WHO WE ARE**
2. **THE DATA WE COLLECT ABOUT YOU**
3. **HOW IS YOUR PERSONAL DATA COLLECTED?**
4. **HOW WE USE YOUR PERSONAL DATA**
5. **DISCLOSURES OF YOUR PERSONAL DATA**
6. **DATA SECURITY**
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8. **YOUR LEGAL RIGHTS**
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1. IMPORTANT INFORMATION AND WHO WE ARE

How we will use your personal information

movebutler is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Intelligent Services Group Ltd trading as **iamproperty** is the controller and responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy policy)

Intelligent Services Group is made up of different legal entities, these being **movebutler**, **Medway Law**, and **iamsold**. This privacy policy is issued on behalf of the Intelligent Services Group so when we mention Intelligent Services Group, “we”, “us” or “our” in this privacy policy, we are referring to the relevant company in the [Intelligent Services Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. Intelligent Services Group is the controller and responsible for this website.

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

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Email address: **dpo@iamproperty.com**

Postal address: **iamproperty** Floor 6 Arden House. Regent Centre. Gosforth. Newcastle upon Tyne. NE3 3LU

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

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

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes address, email address and telephone numbers.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use, and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

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

Get in touch.

0345 646 0302

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3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions

You may give us your Identity and Contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

Automated technologies or interactions

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our **cookie policy** for further details.

Third parties or publicly available sources

We will receive personal data about you from various third parties and public sources as set out below. Technical Data from the following parties:

- analytics providers such as Google based outside the UK
- advertising networks based inside the UK; and
- search information providers such as Credas Technologies Limited based inside the UK

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4. HOW WE USE YOUR PERSONAL DATA

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

Where we need to perform the contract, we are about to enter into or have entered into with you. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal obligation.

[Click here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new vendor or purchaser	a. Identity b. Contact	Performance of a contract with you
To manage our relationship with you which will include: a. Notifying you about changes to our terms or privacy policy b. Asking you to leave a review or take a survey	a. Identity b. Contact c. Profile d. Marketing & Communications	a. Performance of a contract with you b. Necessary to comply with a legal obligation c. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	a. Identity b. Contact c. Profile d. Usage e. Marketing & Communications	a. Performance of a contract with you b. Necessary for our legitimate interests (to study how users use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a. Identity b. Contact c. Technical	a. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) b. Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	a. Identity b. Contact c. Profile d. Usage e. Marketing & Communications f. Technical	Necessary for our legitimate interests (to study how users use our products/services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, products/services, marketing, user relationships and experiences	a. Technical b. Usage	Necessary for our legitimate interests (to define types of users for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	a. Identity b. Contact c. Technical d. Usage e. Profile f. Marketing & Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

Where you opt in to receiving marketing communications, you can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences OR by following the opt-out links on any marketing message sent to you OR by contacting us at any time.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our **cookie policy**.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURE OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below.

- Internal Third Parties as set out in the **Glossary**
- External Third Parties as set out in the **Glossary**
- Specific Third Parties as set out in the **Third Parties**

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or contractors. Where this is the case, we will minimise data accessible as much as possible to only what is needed.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- **Request access to your personal data**
- **Request correction of your personal data**
- **Request erasure of your personal data**
- **Object to processing of your personal data**
- **Request restriction of processing your personal data**
- **Request transfer of your personal data**
- **Right to withdraw consent**

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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9. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Intelligent Services Group (acting as joint controllers or processors) and who are based in the United Kingdom, and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers [acting as processors] based within the United Kingdom who provide IT and system administration services].
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors, and insurers based in the United Kingdom who provide [consultancy, banking, legal, insurance and accounting services].
- HM Revenue & Customs, regulators, and other authorities [acting as processors or joint controllers] based in the United Kingdom, who require reporting of processing activities in certain circumstances.
- Credas Technologies Ltd based in the United Kingdom [acting as processors] for the purpose of identification verification of clients.
- Embrace Financial Service Limited, based in the United Kingdom [acting as processors or joint controllers] for the purposes of advising on and arranging regulated mortgages, insurance, and protection.
- Mortgage Gym Limited, based in the United Kingdom (acting as processors] for the purpose of providing a white labelled online mortgage eligibility calculator.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. Requests to receive copies of information held about you can be made in writing by letter or by email to the Data

Protection Officer. The Data Protection Officer will respond to the request within 30 days of the date the request and suitable identification is received. We reserve the right to refuse requests that are manifestly unfounded or excessive and should a request be refused you will be advised as to the reasons why.

Request correction of your personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios, if you want us to establish the data's accuracy:

- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent. You may do this at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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COOKIE POLICY

A cookie is a text file containing small pieces of data unique to your device. These allow us to identify your device and respond to you as an individual, whilst you use our website. We use cookies in the following scenarios:

Personalisation

We may tailor your experience of our website, based on your previous usage or preferences that have been set for or by you.

- These will be cookies from ourselves.
- These are not required for the critical operation of our website.

Session Management

If you login to a restricted area of our website, we will use cookies so that we know who is logged in and to prevent you from having to login again within a short period of time.

In some instances, we may associate your previous usage of our website, with your user account, so that we can better tailor our service and website to you.

- These will be cookies from ourselves.
- These are required for the critical operation of our website, but only once you have logged in.

Website Functionality

In some instances, functionality on our website, may require cookies to be placed on your device in order to work correctly. This may include (but is not limited to) functionality such as making payments, viewing videos, or sharing content on social media.

- These will sometimes, but not always, be cookies from third parties.
- In some instances, these are required for the critical operation of our website.
- Where they are not, we will use the criteria outlined in the Your Cookie Preferences section, to decide whether to show or hide content, and/or remove functionality.

Site Usage

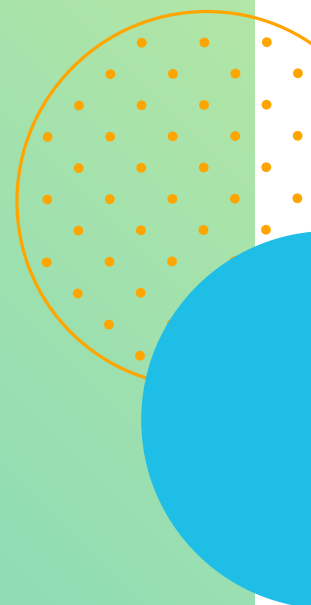
We may track and analyse your usage of the website in order to understand content that is of interest to customers or provide more relevant content in the future. Data that is provided to use as part of analytics cookies may include (but is not limited to) your IP address, and information about your browser, device, location, demographic, and interests.

- These will be cookies from a third party, as we use a third-party tool to carry out this analysis.
- The third-party tool removes personally identifiable information, as soon as possible, before analysis.
- These are not required for the critical operation of our website.

Website Performance

We regularly monitor the performance of our website, so that we can identify problems and fix them as quickly as possible. In order to do this, we collect information about your browser, device, location, and (if you're logged in) some of your account details, so that we can quickly replicate and respond to these issues.

- These will be cookies from a third party, as we use a third-party tool to carry out this monitoring.



- These are required for the critical operation of our website.

Website Enhancement

We want to provide the best possible experience when you use our website. In order to do so, on occasion, we may use third party software, to anonymously collect information relating to your interactions with our website. This allows us to make informed decisions on improvements to our website, products, and services.

- These will be cookies from a third party, as we use a third-party tool to review your interactions.
- These are not required for the critical operation of our website.

Your Cookie Preferences

Where we use cookies, we will not automatically place them onto your device, unless:

- You have explicitly agreed to the use of cookies; or
- The cookies are required for the critical operation of the website (see How we use cookies); or
- You are not personally identifiable at point of data usage by us.

If a cookie does not satisfy the criteria above, we will advise you that there is content or functionality that has been redacted, however, you may be unable to use that area of the website fully.

You can usually delete cookies from your device at any time. See your browser settings for this.

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