

Privacy Policy

SUMMARY

Prime Portfolio is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.primeportfolio.com are accepting and consenting to the practices described in this policy. For the purpose of the Data Protection Act 1998 (the Act), the data controller is Mr John Vaughan, FNAEA MARLA, Prime Portfolio, 22 Grosvenor Gardens, London SW1W 0DH

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1. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on our site, www.primeportfolio.com including personal information (name, email address and telephone number), financial or company information that you disclose when agreeing to purchase any of our products or services.
- Account usage information, lists and templates stored by you on our site including the frequency and size of your mailings.
- If you contact us, we may keep a record of that correspondence and ask for information if you report a problem with our site.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our site and of the fulfilment of your orders.
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

You consent to any information concerning you which we collect and process being used, stored and processed in accordance with this Privacy Policy.

2. COOKIES

We use a cookie file on our site to store your user account information to improve the usability of our site. A cookie is a very small text file placed on your computer or device. Cookies help us to:

1. understand browsing habits on the Sites;
2. understand the number of visitors to the Sites and the pages visited; and
3. remember you when you return to the Sites so we can provide you with access to previously saved quotes.

For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Policy at www.primeportfolio.com

3. STORAGE

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. 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 strict procedures and security features to try to prevent unauthorised access.

4. USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our services, when you choose to do so.
- To notify you about changes to our services.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you. You may at any time opt out of receiving mailings from us by using the unsubscribe link provided on these mailings. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

5. DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Prime Portfolio or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the terms of use on our site or under any other agreements; or to protect the rights, property, or safety of Prime Portfolio, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

6. YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at john@primeportfolio.com. Our site may, from time to time, contain links to and from the websites of our partner networks, collaborators and affiliates. If you follow a link to any of these websites, please note that these websites may have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

7. PERSONAL INFORMATION

Unless a longer retention period is required or permitted by law, we will only hold your personal information on our systems for the period necessary to fulfil the purposes outlined in this Privacy Policy or until you request it is deleted. If, having registered for any of our Services, you do not use them for a reasonable time (which may vary depending on the Service(s) you've registered for) we may contact you to ensure you're still happy to receive communications from us. Even if we delete your personal information it may persist on backup or archival media for legal, tax or regulatory purposes.

We will only collect and use your personal information in accordance with data protection laws. Our grounds for processing your personal information are as follows:

1. Consent – Where necessary we will only collect and process your personal information if you have given your consent for us to do so, for example, we will only send you certain marketing emails and process any sensitive information about you if we have your consent.

2. Legitimate Interests – We may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of “legitimate interests” as a justification for processing your personal information. Our legitimate interests for processing your personal information are:

(i) to communicate with you about the Services. We need to keep you informed about your use of the Services for example sending you a confirmation email of your service. This won't include marketing communications unless you have given us your consent to receive these; and

(ii) to improve our Services. We may use your personal information to: personalise aspects of our service; for market research; and to use our smart search services. We constantly aim to improve our Services to you and using your personal information in this way helps us to do this.

From May 2018, you will have a right to object to our use of your personal information for these legitimate interests including where we may use your personal information to create a profile to inform customer demographics. If you raise an objection we will stop processing your personal information unless very exceptional circumstances apply, in which case we will let you know why we are continuing to process your personal information. Please contact john@primeportfolio.com if you wish to exercise this right.

8. ACCURACY OF DATA

We will seek to keep your data and information accurate and up to date but can only do so effectively if you provide us with the information we need to enable us to do so. If there are changes to your data, for example a change in your email address, you are responsible for notifying us of those changes so we can up-date our records.

Any electronic marketing communications we send you will include clear and concise instructions to follow should you wish to unsubscribe at any time, via the link received in emails or by emailing us at john@primeportfolio.com

Should you no longer wish to be contacted by us, you can advise us at any time by contacting our team on 020 7409 0209, lines are open Monday to Friday 9.00 to 5.00 or by sending an email to john@primeportfolio.com

If you no longer wish to be contacted by providers for marketing purposes, please follow the instructions in their marketing communications, or consult their privacy policies for further information about unsubscribing.

9. ACCESS TO INFORMATION

You have certain rights under existing data protection legislation including the right to request a copy of the personal information we hold about you, if you request it from us in writing.

From May 2018 you will have the following rights:

- (i) Right to access: the right to request copies of your personal information from us;
- (ii) Right to correct: the right to have your personal information rectified if it is inaccurate or incomplete;
- (iii) Right to erase: the right to request that we delete or remove your personal information from our systems;

(iv) Right to restrict our use of your information: the right to 'block' us from using your personal information or limit the way in which we can use it;

(v) Right to data portability: the right to request that we move, copy or transfer your personal information;

(vi) Right to object: the right to object to our use of your personal information including where we use it for our legitimate interests or where we use your personal information to carry out profiling to inform our market research and customer demographics.

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint please contact us.

If you are not satisfied with the way any complaint you make in relation to your personal information is handled by us then you may be able to refer your complaint to the relevant data protection regulator which in the UK is the Information Commissioner's Office.

This Privacy Policy shall be governed and construed in all respects in accordance with the laws of England and Wales.

10. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to john@primeportfolio.com