



## **1st Planner Ltd. Privacy Policy**

At 1st Planner Ltd, we take privacy very seriously. We've updated our privacy policy to ensure that we communicate to you, in the clearest way possible, how we treat personal information. We encourage you to read this Policy carefully. It will help You make informed decisions about sharing your personal information with us.

The defined terms in this Policy have the same meaning as in our Terms of Use, which you should read together with this Policy. By accessing our Website and using our Service, you consent to the terms of this Policy and agree to be bound by it and our Terms of Use.

### **1st Planner Ltd collects your personal information**

1st Planner Ltd is a provider of Home and Commercial buildings.

The Service involves the storage of Data about your properties and individual users. That Data can include personal information. "Personal information" is information about an identifiable individual, and may include information such as the individual's name, email address, telephone number, address and other information. 1st Planner Ltd may collect personal information directly from you when you:

- register to use the Service,
- use the Service,
- contact 1st Planner Ltd,
- visit our Website.

You can always choose not to provide your personal information, but it may mean that we are unable to provide you with the Service.

### **1st Planner Ltd may receive personal information from others about you**

Through your use of the our Service, we may also collect information from you about someone else. If you provide us with personal information about someone else, you must ensure that you are authorised to disclose that information to us and that, without us taking any further steps required by applicable data protection or privacy laws, 1st Planner Ltd may collect, use and disclose such information for the purposes described in this Policy.

This means that you must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Policy, including the fact that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, 1st Planner Ltd's identity, and how to contact 1st Planner Ltd.

Where requested to do so by us, you must also assist us with any requests by the individual to access or update the personal information you have collected from them and entered into the Service.

### **1st Planner Ltd collects, holds, and uses personal information for limited purposes**

1st Planner Ltd collects your personal information so that we can provide you with our Service and any related services you may request. In doing so, we may use the personal information we have collected from you for purposes related to the Services including to:

- verify your identity,
- administer our Service,
- notify you of new or changed services offered
- carry out marketing or training
- assist with the resolution of technical support issues or other issues
- comply with laws and regulations in applicable jurisdictions, and
- communicate with you.

By using our Service, you consent to your personal information being collected, held and used in this way and for any other use you authorise. 1st Planner Ltd will only use your personal information or that of anyone else, for the purposes described in this Policy or with your express permission.

### **1st Planner Ltd can aggregate your non-personally identifiable data**

By using our Service, you agree that we can access, aggregate and use non-personally identifiable data we have collected from you. This data will in no way identify you or any other individual.

1st Planner Ltd may use this aggregated non-personally identifiable data to:

- assist us to better understand how our customers are using the Service,
- provide our customers with further information regarding the uses and benefits of the Service,
- enhance productivity, including by creating useful insights from that aggregated data and allowing you to benchmark data against that aggregated data, and
- otherwise to improve the Service.

### **1st Planner Ltd holds your personal information on servers located in the USA.**

All Data, including personal and non-personal information, that is entered into the Service by you, or automatically imported on your instruction, is transferred to our servers as a function of transmission across the Internet. By using the Service, you consent to your personal information being transferred to our servers as set out in this Policy.

Currently our servers are located in San Jose, USA, by Google. Inc. Your personal information will be routed through, and stored on, those servers as part of the Service. Google Inc. complies with relevant aspects of the Data Protection Act. If the location of our servers change in the future, we will update this Policy. You should review our Policy regularly to keep informed of any updates.

By providing Your personal information to us you consent to us storing your personal information on servers hosted in the USA. While your personal information will be stored on servers located in the USA, it will remain within our effective control at all times. The server host's role is limited to providing a hosting and storage service to 1st Planner Ltd, and we've taken steps to ensure that our server hosts do not have access to, and use the necessary level of protection for, your personal information and that of others, uploaded by you.

If You do not want Your personal information to be transferred to a server located in the USA, You should not provide us with your personal information or use our Services.

### **1st Planner Ltd takes steps to protect your personal information**

1st Planner Ltd is committed to protecting the security of your personal information and we take all reasonable precautions to protect it from unauthorised access, modification or disclosure. Your personal information is stored on secure servers that have SSL Certificates issued by leading certificate authorities, and all Data transferred between you and the Service is encrypted.

However, the Internet is not in itself a secure environment and we cannot give an absolute assurance that your information will be secure at all times. Transmission of personal information over the Internet is at your own risk and you should only enter, or instruct the entering of, personal information to the Service within a secure environment.

We will advise you at the first reasonable opportunity upon discovering or being advised of a security breach where your personal information is lost, stolen, accessed, used, disclosed, copied, modified, or disposed of by any unauthorised persons or in any unauthorised manner.

### **1st Planner Ltd only discloses Personal Information in limited circumstances**

We will only disclose the personal information you have provided to us to entities outside of 1st Planner Ltd if it is necessary and appropriate to facilitate the purpose for which your personal information was collected in accordance to this Policy, including the provision of the Service.

We will not otherwise disclose any personal information to a third party unless express consent has been provided. However, you should be aware that we may be required to disclose your personal information without your consent in order to comply with any court orders, or other legal process or investigation if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose your personal information.

The third parties who host our servers do not control, and are not permitted to access or use your personal information except for the limited purpose of storing the information. This means that, for the purposes of UK privacy legislation and UK users of the Service, 1st Planner Ltd does not currently “disclose” personal information to third parties located overseas.

### **You may request access to your personal information**

It is your responsibility to ensure that the personal information you provide to us is accurate, complete and up-to-date. You may request access to the information we hold about you, or request that we update or correct any personal information we hold about You, by setting out Your request in writing and sending it to us at [enquiries@1stplanner.com](mailto:enquiries@1stplanner.com)

1st Planner Ltd will process your request as soon as reasonably practicable, provided we are not otherwise prevented from doing so on legal grounds. If we are unable to meet your request, we will let you know why. For example, it may be necessary for us to deny your request if it would have an unreasonable impact on the privacy or affairs of other individuals, or if it is not reasonable and practicable for us to process your request in the manner you have requested. In some circumstances, it may be necessary for us to seek to arrange access to your personal information through a mutually agreed intermediary.

We'll only keep your personal information for as long as we require it for the purposes of providing you with the Service. However, we may also be required to keep some of your personal information for specified periods of time, for example under certain laws relating to corporations, money laundering, and financial reporting legislation.

### **1st Planner Ltd uses cookies**

In providing the Service, we utilise “cookies”. A cookie is a small text file that is stored on your computer for record-keeping purposes. A cookie does not identify you personally or contain any other information about you but it does identify your computer.

We use Visitor Analytics, it is a simple website analytics service which measures the traffic and visitors' general details of the customers' websites.

Basically, we are using cookies to collect data about visitors' device type and screen size, approximate location, browser, OS, IPs, page visits, bounce rate, conversions and popular content on the website. All this data is pseudonymized and Visitor Analytics will never use the collected data to identify individual users or to match it with additional information on an individual user. Each visitor has control over the cookies placement.

You can set your browser to notify you when you receive a cookie so that you will have an opportunity to either accept or reject it in each instance. However, you should note that refusing cookies may have a negative impact on the functionality and usability of the Website.

You can disable our cookies by visiting <https://www.visitor-analytics.io/wix-opt-out-do-not-track/>

### **Privacy complaints process**

If You wish to complain about how we have handled Your personal information, please provide our Privacy Officer with full details of Your complaint and any supporting documentation:

- by e-mail to [enquiries@1stplanner.com](mailto:enquiries@1stplanner.com)
- by letter to 18 Brunwood Road, Matlock Bath, Derbyshire, DE4 5PA

Will endeavour to:

- provide an initial response to your query or complaint within 10 business days, and
- investigate and attempt to resolve your query or complaint within 30 business days or such longer period as is necessary and notified to you by our Privacy Officer.

### **This policy may be updated from time to time**

1st Planner Ltd reserves the right to change this Policy at any time, and any amended Policy is effective upon posting to this Website. We will make every effort to communicate any significant changes to you via email or notification via the Service. Your continued use of the Service will be deemed acceptance of any amended Policy.