



## Orega (Management) Limited's Privacy Notice

Orega (Management) Limited (**Orega**) respects your privacy and is committed to protecting your personal data. This Privacy Notice explains who we are, how we collect, share and use personal information about you and how you can exercise your privacy rights.

If you have any questions or concerns about our use of your personal information, including any requests to exercise your legal rights, then please contact us using the contact details provided at the bottom of this Privacy Notice.

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below.

1. **IMPORTANT INFORMATION AND WHO WE ARE**
2. **THE DATA WE COLLECT ABOUT YOU**
3. **HOW IS YOUR PERSONAL DATA COLLECTED**
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5. **COOKIES AND SIMILAR TRACKING TECHNOLOGY**
6. **DISCLOSURES OF YOUR PERSONAL DATA**
7. **INTERNATIONAL TRANSFERS**
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10. **YOUR LEGAL RIGHTS**

### 1. **Important information and who we are**

#### **Purpose of this Privacy Notice**

This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights.

It is important that you read this Privacy Notice together with any other Privacy Notice or fair processing notice 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 Notice supplements the other notices and is not intended to override them.



## **Controller**

Orega is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this Privacy Notice).

## **Contact details**

Our full details are:

Full name of legal entity: Orega (Management) Limited

Email address: [hello@orega.com](mailto:hello@orega.com)

Postal address: 101 Finsbury Pavement, London, EC2A 1RS

Telephone number: 0800 840 5509

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would 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 Notice and your duty to inform us of changes**

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

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**

Our 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 Notice 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 and which may also include you supplying us with photo ID, copy passport information and/or NI number.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **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 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 may be derived from your personal data but is not considered personal data in law as this data does **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 Notice.

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 goods 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.

### **3. How is your personal data collected?**

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



- **Direct interactions.** You may give us your Identity or 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:
  - register an account with us;
  - enter into a contract with us in relation to services provided by us;
  - subscribe to marketing communications from us;
  - submit enquiries to us;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - **Technical Data** from the following parties:
    - advertising networks; and
    - search information providers.
  - **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services.
  - **Identity and Contact Data** from data brokers or aggregators. We will only accept Identity and Contact Data in this way where we have checked that these third parties either have your consent to disclose your personal data to us for the purposes of contacting you to offer services in relation to which you have made enquiries with those third parties or are otherwise legally permitted or required to disclose your personal data to us. We will notify you when we receive your personal data from a data broker or aggregator to confirm with you that you consent to us processing your data for the purposes advised by that data processor or aggregator.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### 4. How we use your personal data

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you (including verifying your identity), (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.



If we ask you to provide personal information to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our business and communicate with you as necessary to provide our services to you and for our legitimate commercial interest including, but not limited to:

- (a) when responding to your queries,
- (b) to manage our relationship with you including notifying you about changes to our terms or to this Privacy Notice;
- (c) improving our platform, products and services;
- (d) supporting our business operations;
- (e) unless you tell us otherwise, undertaking marketing of any or all of the services that we provide and which we consider may be of interest to you; or
- (f) for the purposes of detecting or preventing illegal activities.

We may have other legitimate interests and, if appropriate, we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided above under the "[Contact details](#)" subheading.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails that we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please [contact us](#).

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

### **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. Cookies and similar tracking technology

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

**Strictly necessary cookies.** These are cookies that are required for the operation of our website.

**Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you and remember your preferences (for example, your choice of language and live chat preferences).

**Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) please note that some parts of this website may become inaccessible or not function properly.

## 6. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out at paragraph 4 above.

- Internal Third Parties such as other group companies.
- External Third Parties such as:
  - Service providers who provide data processing services to us (for example, in relation to the provision of services to you pursuant to a contract that you have entered into with us or to support



the delivery of, provide functionality on, or help to enhance the security of our website), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information.

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the EEA 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 may require reporting of processing activities in certain circumstances.
  - To an actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice.
  - Landlords in relation to premises where we provide services. We are required to notify the landlords of each building when a new tenant takes occupation and this may involve disclosure of your personal data if you are the tenant.
  - Third parties such as data brokers where our lease for premises is to expire and we consider that the broker may be able to provide assistance to you in relation to you finding alternative accommodation.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets or who take over any of our rights or obligations under a contract that we have with you. This will include where we have entered into a contract with you in relation to premises where our lease in relation to those premises expires and a third party takes over the lease and our liabilities under our contract with you. 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 Notice.

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.

## **7. International transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

## **8. 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.

## 9. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

In some circumstances you can ask us to delete your data: see '[Request erasure](#)' below for further information.

In some circumstances we may 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.

## 10. Your legal rights

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

**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.

**Request correction** of the 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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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.

**Withdraw consent 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 do not withdraw your consent nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than 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.

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 may 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 may 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.