

# PRIVACY POLICY

Procuco Limited

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*This policy applies to: <https://www.theprocuco.com/>*

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## 1. Who We Are

This privacy policy explains how Procuco Limited (“we”, “us”, or “our”) collects, uses, stores, and shares your personal data when you visit our website at <https://www.theprocuco.com/> (“Our Site”) or otherwise interact with our services.

Procuco Limited is a limited company registered in England and Wales under company number 14483203. Our registered address is Labs House, 15-19 Bloomsbury Way, London, WC1A 2TH.

We are regulated by Propertymark, Membership No: C0140246.

For the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, Procuco Limited is the data controller. This means we are responsible for deciding how and why your personal data is processed.

**Data Protection Contact:** If you have any questions about this privacy policy or our data practices, please contact us using the details in Section 17.

## 2. Scope of This Policy

This privacy policy applies to your use of Our Site and any services we provide to you. It describes what personal data we collect, how we use it, the lawful bases for processing, who we share it with, how we protect it, and your rights.

Our Site may contain links to other websites. We have no control over how those websites collect, store, or use your personal data. We advise you to review the privacy policies of any third-party websites before providing them with your data.

## 3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 as any information relating to an identified or identifiable living individual. This includes information that can directly identify you (such as your name) and information that can indirectly identify you (such as an online identifier or IP address).

We do not collect any “special category” personal data (such as data about your race, ethnicity, religious beliefs, health, or sexual orientation), nor do we collect data relating to criminal convictions and/or offences.

## 4. What Personal Data We Collect and How

Depending on how you interact with Our Site and our services, we may collect and process the following personal data:

Category of Data	Examples	How We Collect It
Identity data	Full name	Contact form on Our Site
Contact data	Email address, phone number, postal address	Contact form on Our Site
Financial data	Estimation of monthly budget	Contact form on Our Site
Technical data	IP address, browser type and version,	Automatically via cookies

	operating system, referral source, visit duration, page views	and server logs
Communications data	Content of correspondence when you contact us	Email, phone, or contact form

All personal data that we collect directly from you is provided voluntarily. You are under no obligation to provide personal data to us; however, if you choose not to provide certain data, we may be unable to provide some or all of our services to you.

## 5. How and Why We Use Your Personal Data (Lawful Bases)

Under the UK GDPR, we must always have a lawful basis for processing your personal data. The following table explains the purposes for which we use your personal data and the corresponding lawful bases:

Purpose / Activity	Data Used	Lawful Basis
Supplying our services to you	Identity, contact, financial data	Performance of a contract with you, or taking steps at your request prior to entering a contract (Article 6(1)(b))
Personalising and tailoring our services for you	Identity, contact, technical data	Legitimate interests – to provide you with a better, more relevant service (Article 6(1)(f))
Communicating with you (responding to enquiries, providing updates)	Identity, contact, communications data	Legitimate interests – to respond to and manage client relationships (Article 6(1)(f)); or performance of a contract (Article 6(1)(b))
Sending you marketing communications (email newsletters, offers)	Identity, contact data (email address)	Consent – you can withdraw at any time (Article 6(1)(a))
Website administration, analytics, and improvement	Technical data	Legitimate interests – to keep Our Site running efficiently and to improve our services (Article 6(1)(f))
Compliance with legal obligations	All categories as necessary	Legal obligation (Article 6(1)(c))

### Legitimate Interests

Where we rely on legitimate interests as a lawful basis, we have conducted a Legitimate Interests Assessment (LIA) to ensure that our interests do not override your fundamental rights and freedoms. You have the right to object to processing based on legitimate interests. Please see Section 11 for details.

### Consent

Where we rely on your consent to process personal data, you have the right to withdraw that consent at any time. You can do this by contacting us using the details in Section 17, or by using the unsubscribe link in any marketing email. Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

## Purpose Limitation

We will only use your personal data for the purpose(s) for which it was originally collected, unless we reasonably consider that another purpose is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

## 6. Marketing Communications

With your consent, we may use your personal data to contact you by email or telephone with information, news, and offers about our services. You will not receive unsolicited marketing or spam.

You can opt out of marketing communications at any time by:

- Clicking the “unsubscribe” link in any marketing email
- Contacting us using the details in Section 17

We will always obtain your express opt-in consent before sharing your personal data with third parties for their own marketing purposes. We comply with the Privacy and Electronic Communications (EC Directive) Regulations 2003.

## 7. How Long We Keep Your Personal Data

We will not keep your personal data for longer than is necessary for the purpose(s) for which it was collected. The specific retention periods depend on the type of data and the purpose of processing:

Type of Data	Retention Period	Reason
Client/contract data	6 years after the end of the contract	To comply with legal, tax, and accounting obligations
Enquiry/contact form data	2 years from date of last contact	To respond to enquiries and follow-up
Marketing consent records	Until consent is withdrawn, plus 1 year	To demonstrate lawful consent was obtained
Website analytics / technical data	26 months	For website improvement and performance analysis

When your personal data is no longer needed, we will securely delete or anonymise it. In some cases, we may anonymise your 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.

## 8. Where We Store and Transfer Your Personal Data

We store your personal data within the United Kingdom. This means it is protected by the UK GDPR and the Data Protection Act 2018.

In some cases, data may be transferred to, stored, or processed outside the UK by us or our third-party service providers (for example, cloud hosting or email delivery services). Where this happens, we will ensure that appropriate safeguards are in place to protect your personal data, including:

- Transfers to countries with an adequacy decision from the UK Secretary of State
- Standard contractual clauses approved by the ICO
- International Data Transfer Agreement (IDTA) or UK Addendum to the EU Standard Contractual Clauses

If you would like further information about the specific safeguards applied to transfers of your personal data, please contact us using the details in Section 17.

## 9. Data Security

The security of your personal data is important to us. We have implemented appropriate technical and organisational measures to protect your data against unauthorised or unlawful processing, and against accidental loss, destruction, or damage, including:

- Limiting access to your personal data to employees, agents, contractors, and third parties who have a legitimate business need and are subject to duties of confidentiality
- Using encryption for data in transit (SSL/TLS) and at rest where appropriate
- Maintaining procedures for dealing with data breaches, including notifying you and/or the Information Commissioner's Office where legally required
- Regular testing and review of our security measures

While we take all reasonable steps to protect your personal data, no method of transmission over the internet or electronic storage is 100% secure. We cannot guarantee absolute security.

## 10. Who We Share Your Personal Data With

We will not share your personal data with any third parties for their own purposes, except in the following circumstances:

### Service Providers

We may share your data with trusted third-party service providers who assist us in operating Our Site and delivering our services (for example, website hosting providers, email service providers, IT support, and payment processors). These providers are contractually bound to process your data only on our instructions and in accordance with applicable data protection law.

### Business Transfers

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner will continue to use your data in the same way(s) as set out in this privacy policy.

### Legal Requirements

We may be legally required to share certain personal data if we are involved in legal proceedings, complying with legal obligations, a court order, or the instructions of a government authority.

Where we share your data with third parties, we take steps to ensure they handle it safely, securely, and in accordance with your rights, our obligations, and their obligations under the law.

## 11. Your Rights Under Data Protection Law

Under the UK GDPR and the Data Protection Act 2018, you have the following rights with respect to your personal data. We will always work to uphold these rights:

**The right to be informed:** You have the right to be told how your personal data is being collected and used. This privacy policy fulfils our obligation to provide you with this information.

**The right of access:** You can request a copy of the personal data we hold about you (see Section 12 for details).

**The right to rectification:** If any personal data we hold about you is inaccurate or incomplete, you can ask us to correct or complete it.

**The right to erasure (“right to be forgotten”):** In certain circumstances, you can ask us to delete the personal data we hold about you.

**The right to restrict processing:** You can ask us to stop or limit the processing of your personal data in certain circumstances.

**The right to object:** You can object to our processing of your personal data where we rely on legitimate interests as our lawful basis. We will stop processing unless we can demonstrate compelling legitimate grounds.

**The right to withdraw consent:** Where we rely on your consent, you can withdraw it at any time without affecting the lawfulness of processing before withdrawal.

**The right to data portability:** Where we process your data based on consent or for a contract, and that processing is automated, you can request a copy of your data in a structured, commonly used, machine-readable format.

**Rights related to automated decision-making and profiling:** We do not carry out any automated decision-making or profiling using your personal data.

To exercise any of these rights, please contact us using the details in Section 17. We will respond to your request within one month. In some cases, particularly if your request is complex, we may extend this period by up to two further months, and we will inform you of any such extension.

There is no fee for exercising your rights. However, if a request is manifestly unfounded or excessive (for example, repetitive requests), we may charge a reasonable administrative fee or refuse to act on the request.

For more information about your rights, you can contact the Information Commissioner’s Office (ICO) or visit their website at <https://ico.org.uk/>.

## 12. How to Access Your Personal Data (Subject Access Requests)

If you wish to know what personal data we hold about you, you can make a Subject Access Request (SAR). All subject access requests should be made in writing and sent to the email or postal address shown in Section 17.

There is normally no charge for a Subject Access Request. If your request is “manifestly unfounded or excessive” (for example, if you make repetitive requests), a fee may be charged to cover our administrative costs.

We will respond within one month of receiving your request. If your request is particularly complex, we may require up to three months from the date of your request, but we will keep you fully informed of our progress.

### **13. Cookies**

Our Site may use cookies and similar technologies to distinguish you from other users. Cookies are small text files placed on your device by websites you visit. They help us provide you with a good experience when you browse Our Site and allow us to improve it.

We may use the following types of cookies:

- Strictly necessary cookies – required for the operation of Our Site (e.g., to enable you to log in)
- Analytical/performance cookies – allow us to recognise and count visitors and see how visitors navigate Our Site
- Functionality cookies – used to recognise you when you return to Our Site and to personalise content

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 Our Site may become inaccessible or not function properly.

For more information about the cookies we use, please refer to our Cookie Policy [available on Our Site / to be published separately].

### **14. Links to Other Websites**

Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by those websites. We advise you to review the privacy policies of any third-party websites before providing any data to them.

### **15. Children’s Data**

Our Site and services are not directed at children under the age of 16, and we do not knowingly collect personal data from children. If we become aware that we have collected personal data from a child without verified parental consent, we will take steps to delete that data as soon as possible.

### **16. Changes to This Privacy Policy**

We may update this privacy policy from time to time to reflect changes in our practices, legal requirements, or for other operational reasons. Any changes will be posted on Our Site, and the “Last Updated” date at the top of this policy will be revised.

Where changes are significant, we will make reasonable efforts to notify you (for example, by email or by placing a prominent notice on Our Site). We encourage you to review this policy periodically.

## 17. How to Contact Us

To contact us about anything related to your personal data and data protection, including to make a Subject Access Request, please use the following details:

**Data Controller:** Procuco Limited

**Email:** hello@theprocuco.com

**Telephone:** 020 7871 5001

**Postal Address:** Procuco Limited, Labs House, 15-19 Bloomsbury Way, London, WC1A 2TH

## 18. How to Complain

If you have any concerns about our use of your personal data, we would like the opportunity to address them. Please contact us first using the details in Section 17.

If you are unsatisfied with our response, or believe we are processing your personal data in a way that is not lawful, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). The ICO is the UK's supervisory authority for data protection:

**Website:** <https://ico.org.uk/>

**Telephone:** 0303 123 1113

**Postal Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF