

The Completely Group Limited ("we", "us", or "our") are committed to protecting and respecting your ("data subject") data.

Before we get into the details we want to make it clear we are committed to only collecting and holding onto your data for one of the following reasons:

1. You have provided explicit consent to us to keep your information for a specific purpose. We try to only rely on this legal basis if you use a free email address to register with us. ([As defined in this list](#))
2. You have provided us with your name and professional information, and we can identify a legitimate interest in the processing activities we plan to conduct.
3. We need to hold your data to fulfil a contractual or legal obligation.
4. You work for us, or you have applied to work for us.
5. You've signed up to one of our services.
6. We collect your data as part of the workings of the digital system; for example, IP addresses when you visit our website, your email address when you contact us, or other standard analytics processes.
7. You handed one of our employees your business card.

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## **Data controller and contact information**

The data controller is The Completely Group Limited (the limited company registered in England under registration no. 04321497 and with its registration address at Parklands, Railton Road, Guildford, Surrey, GU2 9JX).

Questions, comments and requests regarding this privacy policy are welcomed and should be sent to [info@completelygroup.com](mailto:info@completelygroup.com).

We are also contactable via post to the following address:

The Completely Group  
Parklands, Railton Road  
Guildford, Surrey  
GU2 9JX

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## **Where this policy applies**

This privacy policy (together with our terms of use and any other documents referred to on it) inform you of what to expect when we collect and use personal information (provided to us by you or a third-party) and explains your rights and how we protect your data.

This policy applies where we act as the data controller in regard to data gathered by all the companies within The Completely Group. Covering all personal data collected through the website domains listed below and any subdomains ("our sites") or provided to us via other means, where we determine the purpose and methods of processing that personal data.

"https://completelyretail.co.uk",  
"https://completelyoffice.co.uk",  
"https://completelyadmin.co.uk",  
"https://completelyindustrial.co.uk",  
"https://completely.property",  
"https://completelygroup.com",  
"https://www.crmarketplace.com",  
"https://www.completely-sustainable.com"  
"http://proptoberfest.org.uk",  
"http://seweddingshow.co.uk"

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## **Controlling your data**

Our site includes means of managing your personal data and marketing preferences.

If you have a Completely Property user account you can [manage your data here.](#)

If you have a CRMarketplace Connect account you can [manage your data here.](#)

You can manage your marketing preferences at anytime [here](#) or by clicking on the email preferences link in the footer of any email sent to you by us.

You can also contact us at any time by email to [info@completelygroup.com](mailto:info@completelygroup.com) to exercise any and all of your rights under the GDPR. Please note you if you request we delete your data from our systems this will impact our ability to provide you with any of our services.

Where we rely on consent as a legal basis to process your data you have the right to remove your consent at any time. You can exercise this right at any time by adjusting your marketing preferences here or by using the unsubscribe link contained in any email we have sent you. If you wish to remove your consent for us to hold any of your data, you need to do so by emailing us at [info@completelygroup.com](mailto:info@completelygroup.com), and we will action a full GDPR compliant delete of all data we hold on you.

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## Marketing Communications

Where we wish to send you marketing communications via email, SMS, post, or phone we will only do so when you have taken an affirmative opt-in action.

In most cases, an opt-in will consist of you actively ticking a box on one of our forms; other methods of opt-in may include sending us a request via post, email, phone or in person.

At the point of opt-in to a marketing list, we will clearly explain the purposes of the list, so you understand what you are signing up for.

Where we rely on consent to process your data for marketing communications, we will make this clear at the point of collection.

[You can manage your marketing communication preferences at any time here.](#)

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## Retention Overview

As a general policy, we do not retain any data for longer than is necessary for the processing for which the data was initially collected, and we conduct data cleansing at a minimum of every 12 months.

For specific retention details, please see the relevant category of data under the ['How we collect and use your data'](#) section of this policy.

We reserve the right to delete any data we believe to be false, outdated, provided without the knowledge of the data subject, or because we can identify no business interest in retaining your data, or as part of routine data cleansing.

For example, if you change employer and do not update the data we hold on you causing our emails to be rejected by your old employer, we will determine that our data is no longer correct and subsequently we will delete your data from our system.

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## How we collect and use your data

We collect data through the forms on our sites, during the registration process for a Completely Property user account and the registration process for our events, in emails sent to us, over the phone, via cookies and other third-party tracking codes installed on our website.

We may process your data for any of the below reasons depending on where and when you provide your data to us.

[You can find details on the cookies and third-party tracking codes here.](#)

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## **1. Completely Property User Accounts**

When registering for an account at <https://user.completely.property/>, we may collect your name, email address, phone number, social media accounts, and company name.

A Completely Property user account covers access to the following sites:

"https://completelyretail.co.uk",

"https://completelyoffice.co.uk",

"https://completelyindustrial.co.uk",

"https://completely.property"

"https://user.completely.property"

Your user account will be assigned a unique anonymised user id; this id is used for analytical purposes. Example include reporting to clients which companies have been viewing their properties listed on our sites; it will also be used to troubleshoot any specific issues reported to us via feedback forms located on our sites or via email or phone to our support team.

We retain information on when you last logged into your account to enable us to enact our data retention policies and measure the usage of our sites.

### **a) Legal basis**

Our legal basis for processing this information is our legitimate interests in monitoring and improving our sites, providing the service for which you have signed up to, keeping you informed of any updates to our services or terms, and providing our users with the necessary information for measuring the performance of their listings on our sites.

[At any time you can edit the data we hold on you here.](#)

### **b) Retention**

We retain account details for the lifetime of your account, defined as the time you register for an account until the moment you instruct us to close the account.

As part of our data maintenance procedures, we may delete all account information for any account that has not been active within the previous 12 months. Non-personally identifiable information such as company name and user id will be retained for analytical purposes.

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## **2. CRMarketplace Accounts**

Upon registering to attend one of our events we will create an account for you at <https://connect.crmarketplace.com/>, this account will contain the information from your Completely Property user account if you have previously created one.

When a new account is created, we may collect your name, email address, phone number, social media accounts, and company name.

Your user account will be assigned a unique anonymised user id; this id is used for analytical purposes. Example include reporting to clients which companies have been viewing their properties listed on our sites; it will also be used to troubleshoot any specific issues reported to us via feedback forms located on our sites or via email or phone to our support team.

We retain information on when you last logged into your account to enable us to enact our data retention policies and measure the usage of our sites.

### **a) Legal basis**

Our legal basis for processing this information is our legitimate interests in monitoring and improving our sites, providing the service for which you have signed up to, keeping you informed of any updates to our services or terms, and providing you with the services.

[At any time you can edit the data we hold on you here.](#)

### **b) Retention**

We retain account details for the lifetime of your account, defined as the time you register for an account until the moment you instruct us to close the account.

As part of our data maintenance procedures, we may delete all account information for any account that has not been active within the previous 12 months. Non-personally identifiable information such as company name and user id will be retained for analytical purposes.

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### **3. Contracts, Customers, Clients, and Prospects**

When we enter into a contract to provide you with one of our services, we prepare a quote or proposal for you, or we take payment for attendance at one of our events we collect data on your name, billing and postal address, email address, phone number, and payment details.

This data is processed on-site at our office and is securely stored and handled by our accounts department.

#### **a) Legal basis**

Our legal basis for processing the above information is to fulfil our contractual obligations, as the processing we undertake is necessary to provide you with our service.

#### **b) Retention**

We are required by law to retain all financial information for six years as standard. In addition, we keep data necessary to fulfil our contractual obligations for the lifetime of our relationship with a client and once that relationship ends we archive the data.

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### **4. Usage of Our Sites / Visitors to Our Sites**

We collect and process data regarding your usage of our websites to help us analyse and improve our services. This data may include, your IP address, general geographical location, user id number, demographic data, and other analytical data on your usage of our sites.

#### **a) Legal basis**

This data is collected through Google Analytics, and the legal basis for processing this data is our legitimate interests in monitoring and improving our sites and services.

#### **b) Retention**

Google Analytics contains an automatic retention policy which we have set for 26 months; this covers all data that is associated with cookies, user identifiers or advertising identifiers.

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## **5. Forms on Our Sites / Marketing Communications**

When you fill in a form on one of our sites, we collect information such as your name, email address, phone number, address, company name, location, job title, and any other data as required to provide the service you have signed up for/requested.

This data may be processed for the following purposes:

- sending you marketing communications which are relevant to the commercial interests of your business,
- managing your subscription for the [Different] magazine via email or post,
- managing your attendance at our events,
- providing your data as part of the delegate list at our events,
- providing you with information, you have requested about our services,
- recording feedback on our services and events,
- to maintain opt-out marketing lists,
- to send you technical alerts about our services and keep you informed of changes to this privacy policy and other policies,
- from time to time to send you surveys for research purposes related to our services or events that you have used/attended,

### **a) Legal basis**

Where we can identify the company you work for our legal basis for storing and processing this data is our legitimate interests in providing you with the service/s or information you have signed up for, and the commercial interests of your business and ours.

If you have filled out one of our forms and we cannot identify the company you work for, we require your consent to process and send you marketing communications. This means we rely on the legal basis of consent to process your data.

We do this because we cannot be sure that our services would be of commercial interest to you and your business. Where we require your permission, we are explicit in what we intend to use your data for and how you can exercise your rights under the GDPR.

[You can manage your preferences here.](#)

### **b) Retention**



We will retain any data entered via forms on our sites for as long as is necessary to continue providing you with the service or information you have requested.

As part of our general data maintenance procedures carried out at a minimum of every 12 months, we delete any data where we can no longer identify a legal basis or need to continue processing or where we can see no interaction has taken place between you and us for an extended period.

For example, you register for email updates on our events, we then retain your data indefinitely until you either unsubscribe or otherwise request we delete your data, or we identify that you have not opened an email from us within the last six months.

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## **6. Job applicants**

If you have applied for a role with The Completely Group, we will collect and process the following data in the course of the recruitment process, recruitment information such as your application form and CV, references, qualifications and membership of any professional bodies and details of any pre-employment assessments.

### **a) Legal basis**

Our legal basis for holding and processing this data is yours and our legitimate interests in facilitating the recruitment process.

### **b) Retention**

Job applicants' data will be retained for the duration of the recruitment process and no longer than 12 months. In most cases, data will be kept no longer than the recruitment process, on occasion we may ask if you are happy for us to keep your data on file in the event a future role becomes alliable that we would like to alert you to.

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## **When and how we share and store personal data and locations of processing**

We do not sell or disclose data to third-parties for their usage.

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards, and all relevant data laws and regulations.

The data that we collect from you is transferred to, and stored at, destinations inside and outside the European Economic Area ("EEA"). Data is also processed by staff operating outside the EEA who work for one of our suppliers.

Staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and provision of support services. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and all relevant data laws and regulations.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We expect you not to share a password with anyone.

In some circumstances, personal data may be transferred outside the countries where our clients and we are located. This includes countries outside the European Union ("EU") and to countries that do not have laws that provide specific protection for personal data.

We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EU are done lawfully.

Where we transfer personal data outside of the EU to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU, such as the European Commission approved standard contractual clauses. The European Commission approved standard contractual clauses are available [here](#).

Personal data held by us can be transferred to and stored at:

- 1) Third party organisations that provide applications/functionality, data processing or IT services to us.

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud-based software as a service provider, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.

2) Third party organisations that otherwise assist us in providing goods, services or information.

3) Auditors and other professional advisers

4) Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulations

Examples of the third-party systems and processors we are currently using are;

A) [Microsoft](#) for email systems, file sharing, and cloud storage

B) [Hubspot](#) for CRM services, customer data storage and management, web and email analytics, marketing software, marketing emails services, landing page hosting, blog hosting, sales prospecting, and marketing automation

C) [Google](#) for web analytics, advertising, dashboard reporting, file sharing, and cloud storage

D) [Synergist](#) for storing client and supplier details

E) [Sage](#) for storing financial data from clients and suppliers

F) [Lodestar](#) for processing and storing data on exhibitors at our events

G) [Reftech](#) for processing name, company, and email data used to produce event badges

H) [Hardings Print Solutions](#) for processing data to produce artwork and delivery of printed materials

I) [Kingsbury Printers](#) for processing data to produce artwork and delivery of printed materials

J) [Paragon Internet Group Ltd](#) for website hosting services

K) [Amazon web services](#) for website hosting services

L) [Mailchimp](#) for email marketing services

M) [Form Assembly](#) for website feedback

N) [Splashtop Inc](#) for encrypted remote desktop data

O) [DocuSign Inc](#) for contracts with clients and suppliers

P) [Datto](#) for offsite data backups

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

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**Disclosure of your information**

We may disclose your personal information to any member of our group, which means our ultimate holding company (The Completely Group Ltd) 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 The Completely Group Limited 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 data in order to comply with any legal obligation, or in order to enforce or imply our terms of use and other agreements, or to protect the rights, property, or safety of The Completely Group Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purpose of fraud prevention and credit risk reduction.

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## **Your rights and how to exercise them**

The GDPR provides the following rights for individuals:

[The right of access](#)

[The right to rectification](#)

[The right to erasure](#)

[The right to restrict processing](#)

[The right to data portability](#)

[The right to object](#)

Below we have outlined in brief your rights under the GDPR. Some of these rights are complex, and we have not gone into full details in our summaries. We encourage you to read the GDPR and the [guidance from the ICO](#) for a full explanation of your rights.

You can exercise these rights at any time verbally, or in writing to us, we recommend you do so by contacting us via email at [info@completleygroup.com](mailto:info@completleygroup.com).

We will respond to all requests to exercise any of your rights within one calendar month.

Please note we may require proof of your identity before complying with your request, this is to prevent anyone impersonating you and gaining access to your data.

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### **Right of access**

You have the right to a copy of any personal and supplementary data we hold on you.

You will not be charged a fee to deal with your request unless the request is manifestly unfounded or excessive, under which circumstances we will charge you a reasonable fee to cover the administrative costs of complying with your request.

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### **Right to rectification**

You have the right to have inaccurate personal data rectified and incomplete data completed.

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### **Right to erasure**

You have the right to have personal data erased under most circumstances.

The right to erasure does not apply if processing your data is necessary for one of the following reasons:

- to exercise the right of freedom of expression and information;
  - to comply with a legal obligation
  - for the performance of a task carried out in the public interest or in the exercise of official authority;
  - for archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing; or
  - for the establishment, exercise or defence of legal claims.
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### **Right to restrict processing**

Under certain circumstances, you have the right to request the restriction or suppression of your personal data.

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## **Right to data portability**

You have the right to obtain and reuse your personal data for your own purposes across different services.

This right only applies where our lawful basis for processing your data is consent or the performance of a contract, and the processing is carried out by automated means. (i.e. excluding paper files)

Your data will be provided in a machine-readable format, most commonly .csv.

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## **Right to object**

You have the right to object to the processing of your personal data in certain circumstances.

While this right only applies in certain circumstances if you contact us and request that we stop processing your data we will do so even if we are not required to by law unless we are under a legal obligation to process your data.

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## **Complaints**

We hope you never have a reason to complain about our usage of your data, however, if you do have a complaint please reach out to us at [info@completleygroup.com](mailto:info@completleygroup.com) and we'll be happy to help resolve any concerns you may have.

If you believe our processing of your personal data infringes data protection laws, you have the legal right in accordance with Article 77 of the GDPR to lodge a complaint with a supervisory authority responsible for data protection.

You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

You can contact the UK supervisory authority right here: <https://ico.org.uk/concerns/>.

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## **Updates to this policy**

This policy was last updated on May 22nd, 2018.

Future updates to this policy will be communicated via email to all users whose data we hold.

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## **Cookies and Analytics**

Please see our [cookies policy](#) for details on the cookies and analytics codes we use across our sites.

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