



Privacy & Cookies

Turley Property Advisors is committed to ensuring that your privacy is protected and our use of your personal information is governed by this Privacy Policy. On this site, "Turley.ie", "our" and "we" each mean all the companies within the Turley & Associates in Ireland (including but not limited to Turley & Associates Limited t/a Turley Property Advisors, which collect and use your information in the manner set out in this Privacy Policy. Any reference to "you" or "your" refers to anyone whose personal information we process.

Introduction

Our use of your personal data will be governed by this Privacy Notice.

Turley is a controller for the personal information that it collects and uses about you. We will treat your personal information as confidential and in accordance with all applicable data protection regulations. Your personal information will only be shared with others in accordance with this Privacy Policy.

This Privacy Policy explains:

1. What is personal information and why we collect it
 - 1.1. Personal information definitions;
 - 1.2. Personal information we collect and why we collect it;
2. How we use your personal information
 - 2.1. Our legal basis for processing;
 - 2.2. Our use of your personal information;
 - 2.3. What happens if you do not provide the requested information;
 - 2.4. How long we keep your personal information;
3. The choices we offer and how you can exercise them

3.1. Your rights in relation to your personal information; and

3.2. How to contact us

4. Other Important Privacy Information

4.1. Security of personal information;

4.2. Overseas transfers of your personal information;

4.3. Updates to this Privacy Policy

Your privacy matters to Turley, so whether you are new to Turley or a long-time customer, please do take the time to get to know our practices – and if you have any questions, contact us. If there are any changes to the way in which your personal information is used, this Privacy Policy will be updated.

1. What is Personal Information & Why We Collect It

1.1. Personal information definitions

Personal information is any information that tells us something about you. This could include information such as name, contact details, date of birth, bank account details or any information about your needs or circumstances which would allow us to identify you.

Some personal information is classified as "special" information under information protection legislation. This includes information relating to race, ethnic origin, political opinions, religion, philosophical beliefs, trade union membership, genetic data when used to uniquely identify the individual, biometric data when used to uniquely identify the individual, health data, data concerning a natural person's sex life, sexual orientation. This information is more sensitive and we need to have further justifications for collecting, storing and using this type of personal information. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction information.

Any references to personal information in this Privacy Policy will include personal information, and where relevant, special categories of personal information.

1.2. Personal information we collect and why we collect it

We will collect your full name and contact details (such as phone number, email address and postal address) from you whenever you engage with us.

In addition, if we are providing a service to you, or on your behalf, where we are required to do so by law, we will collect information relating to your identity, which will

be at least one form of photographic identification (such as a passport, a driving licence or an identification card) and one form of documentation with proof of your place of residence (such as a recent utility bill).

We will also confirm whether you have any relatives or close connections working at Turley so that we can consider potential conflict of interests and, if identified how to manage these, in accordance with our statutory and regulatory obligations.

Depending on the service that we provide to you (or on your behalf) we may also collect additional personal information, as detailed below.

Buy, Sell, Let, Rent

If you are buying, selling or letting a property through us:

- We will collect a contact telephone number and/or an email address to get in touch with you about organising viewings and updating you on any offers received or rental applications for your property.
- Where you have enquired about buying a specific property, we will use your contact details to respond which may include us sending you alternative properties to help with your search.
- Where you are not the legal owner of the property, we will request details from you as to your ability to sell or let the property such as a Power of Attorney or Grant of Probate.
- Where you engage with Turley, we may collect information required to identify you to meet anti-money laundering and counter terrorist financing requirements. If we are dealing with an entity such as a company, trust or charity, we may need to obtain personal information from the beneficiaries of the entity and those in a position of control. This will include, but is not limited to, identity and address documents. We may also need to collect information on other individuals who have an interest in the property who are not considered to be our customers.
- We will collect your bank account details to arrange onward payment of rent due to you.
- Where we are working alongside third parties such as solicitors, developers, joint or multi agents, we may need to share these documents on the basis of legitimate interests.
- If you wish to purchase a property we are listing for sale where you have specifically provided us with these, we will collect personal information relating to any specific access requirements you may have in relation to a property so that we can find a property that is suitable for your needs. We will also collect personal information required to source a property for you and, where required, negotiate the purchase of a property on your behalf.

If you wish to rent a property we are listing, we will collect:

- Your name, contact details and property interests, to facilitate property viewings for you.
- Where you have enquired about renting a specific property, we will use your contact details to respond which may include us sending you alternative properties to help with your search.

- Your proof of ID and proof of current address for the creation of lease and tenancy details.
- In the Republic of Ireland only, your PPSN for registration with the Residential Tenancies Board Ireland.
- Your proof of funds, to confirm your financial ability to perform this monthly transaction.
- Your previous landlord reference and current work reference in order to protect the Landlord's own financial or property interests.
- Your bank, building society or similar account details to allow us to manage an approved tenancy deposit account for you and to set up your rental payments.
- If you are a tenant renting under the 'Right to Rent' scheme (NI and UK only) we will collect details of your biometric residence card, your immigration status document and/or your birth certificate to carry out our required checks under this scheme.

Property Management

- Where we engage with you to manage property on your behalf we will ask for additional emergency contact information in case we need to get in touch with you outside of working hours or in the event there is a matter requiring your urgent attention.
- Where you engage us for portfolio management services, we will share your personal information with third party lenders as is necessary to allow us to fulfil our obligations to you and to properly manage and advise you on your property investments.
- Where you are a tenant in a building managed by Turley, we may need to share your personal information with the property owner, but will only do so where we have considered your own rights first.
- Where we operate CCTV in a property, we may capture your image which would constitute your personal data.

Investment Management

Where you engage with us as an individual investor, we will collect information required to identify you to meet anti-money laundering and counter terrorist financing requirements. If the investor is an entity such as a company, trust or charity, we may need to collect personal information about the controllers and the beneficiaries of the entity.

Other

If you subscribe to receive research, news or other market updates from us, then in addition to the above we will collect details about the sector in which you work and the type of content that you would like to receive.

2. How We Use Your Personal Information

2.1. Our legal basis for processing

Under applicable data protection legislation, we are only permitted to use your personal information if we have a lawful basis for doing so. We rely on the following lawful basis to use your information:

- For employment-related purposes.
- Where we need information to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where the processing is necessary for us to carry out activities for which it is in Turley' legitimate interests (or those of a third party) to do so and provided that your interests and fundamental rights do not override those interests, including:
 - Processing that is necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns. This will include sending you marketing information from time to time after you have engaged us to provide services or received services from us either which may be similar and of interest to you or where you have expressly indicated that you would like to receive such information. You have the right to opt out of receiving this information at any time.
 - Processing that is necessary to improve our knowledge of the real estate sector. This will include undertaking market analysis and research so that we better understand trends in the property sector and provide better knowledge along with more tailored and relevant services for our customers in the future.
 - Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively. This will include: verifying the accuracy of information that we hold about you and create a better understanding of you as a customer; processing for administrative efficiency purposes such as where we outsource certain administrative functions to third parties who are specialise in such services; processing for network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access or to comply with a request from you in connection with the exercise of any of your rights outlined below.

In more limited circumstances we may also rely on the following lawful basis:

- Where we need to protect your interests (or someone else's interests); and/or
- Where it is needed in the public interest or for official purposes.

We may process special categories of personal information and criminal conviction information in the following limited circumstances:

- With your explicit consent, in which case we will explain the purpose for which the information will be used at the point where we ask for your consent.

2.2. Our use of your personal information

Specific information on how your personal information will be used for the particular services you have requested from us is provided below.

Buy, Sell, Let, Rent

- We use your personal information for the purposes of fulfilling our obligations to you to let or sell your property or, if you are a buyer or tenant, for the purposes of arranging viewings, obtaining feedback, and arranging a contract for sale or a lease for you.
- We will use your personal information to conduct due diligence in accordance with other legal or regulatory obligations
- We will share your personal information with your appointed solicitors and the solicitors and agents acting for the other side of the deal as is necessary to facilitate the sale or purchase. We may also share your personal information with joint or multi agents or developers and their appointed contractors, as the case may be.
- We will share your personal information with third party referencing agencies for the purposes of the prevention and detection of crime, fraud and/or money laundering and checking your suitability to rent that property. In such circumstances, the third party referencing agency may act as a data controller for your information.

Property Management

- Where we are managing property on your behalf we may need to pass your personal information from time to time on to third party contractors whom we have engaged to carry out maintenance on your properties (i.e. contact details to organise access for maintenance checks).
- We may also pass your personal information to other companies in the Turley group.
- We operate CCTV in properties based on our legitimate interest in protecting the property and ensuring the safety of visitors, tenants and clients, as well as to assist with the prevention and detection of crime.

Investment

- Where you engage us for portfolio management services we will share your personal information with third party lenders as is necessary to allow us to fulfil our obligations to you, to raise finance for you and to properly manage and advise you on your property investments.

Other uses of your personal information

- If we sell any part of our business and/or integrate it with another organisation your details may be disclosed to our advisers and to purchasers or joint venture partners and their advisers. If this occurs the new owners of the business will only be permitted to use your information in the same or similar way as set out in this privacy notice.
- We will share personal information with our regulators, governmental or quasi-governmental organisations, law enforcement authorities and with courts, tribunals and arbitrators as may be required from time to time in order to comply with our regulatory and legal obligations.
- Where we use third party services providers who process personal information on our behalf in order to provide services to us. This includes IT

systems providers and IT contractors as well as third party referencing or screening agencies for the purposes of the prevention and detection of crime.

- We may share your personal information with any person working within the Turley Property Advisors on a need to know basis to ensure we are able to perform our obligations to you.
- We will hold your personal information on our client management systems and use this to provide you with marketing information about similar services offered by Turley to those which you have engaged us to provide which we feel you might find useful from time to time. You have the opportunity to opt out of receiving this information at any time.

2.3. What happens if you do not provide the information that we request?

We need some of your personal information to perform the services you have requested from us. For example:

- Where we are selling a property on your behalf we need to know your contact information so that we can update you with information on viewings, offers and the progress of the sale; and
- Where you have asked us to find you a property which meets certain access requirements, we may need to know some further details about your particular circumstances so that we can find you a suitable property.

We also need some information so that we can comply with our legal obligations. For example, we may need identity documents from you to meet our obligations to prevent fraud and money laundering.

If you do not provide the information required for these purposes, we will not be able to perform our contract with you and may not be able to provide services to you or continue to provide certain services to you. We will explain when this is the case at the point where we collect information from you.

2.4. How long we keep your personal information

The period for which we will keep your personal information will depend on the type of service you have requested from us. The retention period may be longer than the period for which we are providing services to you where we have statutory or regulatory obligations to retain personal information for a longer period, or where we may need to retain the information in case of a legal claim.

3. The Choices We Offer & How You Can Exercise Them

3.1. Your rights in relation to your personal information

You have a number of rights in relation to your personal information, these include:

- the right to be informed: know how we use your personal information;
- the right of access: obtain access to personal information that we hold of you;
- the right to rectification: request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate;
- the right to erasure (also known as the right to be forgotten): request that we erase your personal information in the following circumstances:
 - if Turley is continuing to process personal information beyond the period when it is necessary to do so for the purpose for which it was originally collected.
 - if Turley is relying on consent as the lawful basis for processing and you withdraw consent.
 - if Turley is relying on legitimate interests as the lawful basis for processing and you can object to this processing and there is no overriding compelling ground which enables us to continue with the processing.
 - if the personal information has been processed unlawfully (i.e. in breach of the requirements of the information protection legislation).
 - if it is necessary to delete the personal information to comply with a legal obligation.
- the right to restrict processing: ask us to restrict our information processing activities where you consider that:
 - your personal information is inaccurate.
 - our processing of your personal information is unlawful.
 - where we no longer need the personal information, but you require us to keep it to enable you to establish, exercise or defend a legal claim.
 - where you have raised an objection to our use of your personal information.
 - the right to data portability: request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need in order to perform our agreement with you and personal information where we are relying on consent to process your personal information.
 - the right to object: object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection, we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information.
 - rights in relation to automated decision making and profiling: right not be subject to wholly automated decisions which produce legal effects, or which could have a similarly significant effect on you.

If you would like to exercise any of your rights, you can do so at any time, by contacting us at info@turley.ie.

Please note that we will keep a record of the fact that you have made a request to exercise your rights, and our response to your request, in order to demonstrate compliance with our data protection obligations and so that we can handle any queries, complaints or claims in relation to your request. This record will be kept in accordance with our retention policies at section 2.4. above.

3.2. How to contact us

If you have any questions, comments or requests regarding any aspect of this Privacy Policy, please do not hesitate to contact us by sending an email to info@turley.ie or writing to the Data Protection Officer, Turley Property Advisors, 89 Harcourt Street, Dublin 2.

If you have any concerns about the way we use your personal information please contact the Data Protection Officer at info@turley.ie who will try to resolve the issue.

If we cannot resolve any issue within the legal timeframe, you have the right to complain to the information protection authority in your country (i.e. the Information Commissioner if you are located in the UK or the Data Protection Commissioner if you are located in Ireland).

4. Other Important Privacy Information

4.1. Security of personal information

The security of information is very important to us and we have measures in place which are designed to prevent unauthorised access to your personal information including but not limited to:

- Our client files are stored on our secure client management systems. Access is restricted on our client systems to those within the business who are required to have access to your information for legitimate business purposes.
- Hard copy documentation is stored in secure offices, locked cabinets and/or off-site at our approved suppliers for long term storage.

All data is hosted in datacentres which have systems and protections in place to protect against both unauthorised access, and other external factors that could cause damage to your personal information. There are strict access requirements in place and access is restricted to those absolutely necessary.

We ensure access to personal information is restricted to Turley employees and workers or other persons working within the Turley & Associates on a need to know basis. Training is provided to any of those Turley employees and workers who need access to personal information.

4.2. Overseas transfers of your personal information

We may transfer, store, or process your personal information in locations outside the Republic of Ireland and the European Economic Area (EEA). Where the countries to which your personal information is transferred do not offer an equivalent level of protection for personal information to the laws of Ireland, we will ensure that appropriate safeguards are put in place.

We'll use one of these safeguards:

- Transfer it to a non-EEA country that has received an adequacy decision from the European Commission. This means that country has privacy laws that give the same protection as within the EEA.

- Put in place the EU Commission’s standard contractual clauses with the recipient. This means that they must protect it to the same standards as organisations within the EEA.
- Transfer it to organisations that have implemented binding corporate rules, which have been approved by an EU supervisory authority.

5. The Use of Website Cookies by Turley

5.1. What is a cookie?

A cookie is a small text file that is downloaded onto your computer when you visit certain websites and allows a website to recognise a user's computer. Cookies are used to help users navigate websites more efficiently and to perform certain functions, as well as to provide information to the owners of the website.

5.2. What cookies do Turley use?

When browsing our website, cookies that are strictly necessary for the performance and function of the website are automatically utilised. We will only utilise non-essential cookies if you have provided us with consent to do so by selecting ‘Allow all cookies’ in the cookies banner.

Refer to the list below to see the cookies used by this website and a brief description of how each cookie works.

I. gpsLanguageCode

Purpose: Records the ISO language code the site defaults to and is updated by the users selection;

More information: Perpetual;

II. gpsCountryCode

Purpose: Records the country ISO code the site defaults to and is updated by the users selection

More information: Perpetual

III. gpsID

Purpose: Unique identifier for user

More information: Perpetual

IV. Google Analytics

Purpose: The Turley Website uses Google Analytics, a web analytics service provided by Google. This sets a cookie in order to evaluate your use of our website and compile reports for us on activity of our website.

More information: How to reject or delete this cookie: <http://www.google.com/intl/en/privacypolicy.html>

V. Google Adwords

Purpose: The Turley Website uses Google Adwords to remarket or use similar audiences to display adverts on other 3rd party websites.

More information: To opt out: <https://support.google.com/ads/answer/2662922?hl=en-GB>

VI. Doubleclick

Purpose: Advertising and marketing effectiveness. A floodlight tag is an image pixel that is created within DFA and resides on the Advertiser's webpage. We may use this for re-targeting optimisation, reporting, and attribution of online adverts.

More information: How to reject or delete this cookie-
https://adssettings.google.com/authenticated?hl=en#display_optout

VII. Facebook

Purpose: Facebook, may use cookies, web beacons, and other storage technologies to collect or receive specific types of information and Turley may use that information to provide targeted ads.

More information: For more information: <https://en-gb.facebook.com/help/568137493302217>

VIII. Yandex

Purpose: Turley uses Yandex Metrica, an analytics platform to evaluate your use of our website.

More information: to opt out: <https://yandex.com/support/metrika/general/opt-out.xml>

IX. TV Squared

Purpose: TV Squared allows us to track the effectiveness of our TV advertising. TV Squared collects information anonymously including the number of visitors to the site, which site or search engine they have come from and the pages they have visited. TV Squared do not collect any personally identifiable information.

X. iGo Digital

Purpose: iGoDigital, used by our email marketing platform ExactTarget, will store one or more cookies on your computer or mobile device when you visit our website. We use cookies to improve the quality of your experience, including enhanced

browsing experiences, place-holding, and non-personal application data. The cookie is not used to store personal or private data.

More information: More information: <http://pages.exacttarget.com/iGoDigitalPrivacy>

XI. Giosg Live Chat

Purpose: The Turley Website uses a 3rd party live chat service, Giosg. This includes the use of cookies for the personalization and analytics. Tracking and storage of data including IP address, content of chat conversations, visited URLs, referrer URL, timestamp, operating system, device, browser.

More information: More information: <https://www.giosg.com/terms-of-service>

XII. Webtrends

Purpose: The Turley website uses WebTrends Analytics package to evaluate the activity on our website.

More information: More information and how to opt out: <https://kb.webtrends.com/articles/Information/Opting-out-of-Tracking-Cookies-1365447872915>

5.3. How do I restrict or delete cookies?

The 12 cookies we use are essential for parts of the website to operate and have already been set. You may delete and block all cookies from this website, but please be aware that restricting or deleting cookies may impact on the functionality of the website.

Your web browser may allow you to restrict or delete cookies set by this website. The Help function within your browser should tell you how. Alternatively, you can visit www.allaboutcookies.org, which provides general information about cookies and how you can manage cookies on your computer.

To opt out of being tracked by Google Analytics across all websites visit: <http://tools.google.com/dlpage/gaoptout>.

6. Updates

We may update this Privacy & Cookies Policy from time to time in response to changing legal, technical or business developments. Please refer to our website (www.turley.ie) for the most up to date version of this document.