

Dot Residential Privacy Policy (in accordance with GDPR)

Last Updated: 23rd May 2019

Founded in 2018, Dot is building a global housing brand focused on delivering beautifully designed homes that people love to live in. Dot leverages design, construction, technology, finance and management to offer a high quality, streamlined living experience for residents; and we empower investors from around the world to invest ethically and professionally without any hassle.

“Dot”, or “we” or “us” or “our” refers to Dot Residential Ltd in this Privacy Policy. This Privacy Policy applies whenever you access any of our products, services, content, dotresidential.com and/or the other domains provided by Dot (such as compass.dotresidential.com and bonds.dotresidential.com), together referred to as “services”.

The EU General Data Protection Regulation (GDPR) replaces the Data Protection Directive 95/46/EC and was designed to harmonise data privacy laws across Europe, to protect and empower all EU citizens data privacy and to reshape the way organisations across the region approach data privacy. Dot Residential is committed to the protection of members’ privacy, and maintaining full GDPR compliance at all times.

Please read this information carefully in order to fully understand how we protect your privacy. You must accept the terms of our Privacy Policy in order to create an account with us and gain access to our products and services.

Contents of our Privacy Policy

1. What information we collect, how we collect it, and why we collect it.
2. What communications we send, and why we send them to you.
3. How we store your personal information, and keep it secure.
4. How and when we share your information.
5. How you can manage your data preferences, and your data protection rights.
6. Updates to this Privacy Policy, and how to contact us.

What information we collect, how we collect it, and why we collect it.

1.1. Personal Data

1.1.1. Username, password, email address, telephone number, address, date of birth, nationality, employment status, bank details and investor status when you register for a Property Investor or Bond Investor account.

1.1.2. This data is collected directly from you via a web form, a telephone, or a direct email.

1.1.3. This data is collected from you in order for you to register an account with us and access our services.

1.2. Communications Data

1.2.1. Communications and interactions between you and Dot, such as service-related emails and phone calls, customer support emails and phone calls, one-to-one sales emails and phone calls and marketing emails.

1.2.2. This data is collected automatically from you when you receive, review, interact with and/or reply to any of our communications.

1.2.3. This data is collected from you in order to provide our services to you.

1.3. Website Data

1.3.1. When you visit our website, we may automatically collect information from your device including your IP address, log-in information, broad geographical location (e.g. country or city-level location), browser type and version, browser plug-in types and versions, operating system and platform, information about your visit including the URL clickstream to, through and from our website, download errors, length of visits to certain pages, page interaction, referral source and similar information. This information may be collected by a third party website analytics service provider on our behalf and may be collected using cookies.

1.3.2. For more information on our use of cookies please refer to our [Cookie Policy](#).

1.3.3. This data is collected automatically from you when you browse and interact with our website.

1.3.4. This data is collected from you in order to develop, improve and personalise our services so as to improve your experience; to administer our website for internal operations; as part of our effort to keep our website safe and secure; to measure, understand and improve relevance of advertising we serve to you and others.

1.4. More broadly, the Personal, Communications and Website data detailed above is collected in order to:

1.4.1. Provide Dot services to you

1.4.2. Respond to your requests and inquiries

1.4.3. Notify you about changes or updates to Dot services

1.4.4. Provide you with opportunities, offers and information about Dot related events, products and services, including participating in surveys and promotions, determined as per your communications preferences.

1.4.5. Evaluate and improve Dot products and services and to develop new products or services.

1.4.6. Identify and analyse usage trends and determine the effectiveness of our promotional campaigns.

1.4.7. Provide technical, product and other support and help keep Dot services working, safe and secure

1.4.8. Comply with our legal obligations.

1.5. Other data uses

1.5.1. We may also combine the personal information that you provide with information that we obtain from other sources or that already exists in our records for the purposes described in section 1.4.

1.5.2. Any use of your personal information for a purpose other than those described in this Privacy Policy will require your prior consent.

1.6. Other data collection

1.6.1. Our services are not intended for children under 13 years of age. We do not knowingly collect personal information from children under 13. If you are under 13, please do not provide any information on our website.

What communications we send, and why we send them to you

2.1. Platform Communications

2.1.1. All communications related to your Dot account, including confirmation emails, greetings, and password reminders.

2.1.2. These communications are sent to you in order to manage and maintain your Dot account.

2.2. Customer Service Communications

2.2.1. Feedback requests, customer service information, help and support regarding your Dot account, and replies to your support requests.

2.2.2. These communications are sent to you in order to offer help and support relating to Dot services and products.

2.3. Sales Communications

2.3.1. One-to-one emails from members of our team with tailored opportunities, news and events related to Dot services and products.

2.3.2. These communications are sent to you in order to bring you personalised opportunities relating to Dot services and products.

2.4. Marketing Communications

2.4.1. Marketing emails such as the Dot Newsletter, Product Launches and latest news and updates all related to Dot services and products.

2.4.2. These communications are sent to you in order to keep you up to date on all of the latest news and updates relating to Dot's products and services.

2.5. Other Communications

2.5.1. We will not contact you with any other communications outside of those described in section 2. of this Privacy Policy.

How we store your personal information, and keep it secure.

3.1. Privacy by design

3.1.1. We have implemented all appropriate technical and organisational measures in an effective way in order to meet the requirements of the Privacy by design regulation and thus protect the rights of our users.

3.1.2. We will only hold and process the data absolutely necessary for the completion of our duties as well as limiting the access to personal data to only those that are required to act out the processing.

3.2. Data location

3.2.1. The Personal Data we obtain from you and any users (including, without limitation, Client Data) may be moved to and stored at a destination within the European Economic Area ("EEA").

3.2.2. Staff members operating within the EEA who work for or on behalf of us may process this information. Such staff members may, among other things, be involved in the processing of payment, the provision of support services and the delivery of our products and services.

3.3. Data retention

3.3.1. We will retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal tax or accounting obligations).

3.3.2. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it.

3.4. Data breach notification

3.4.1. Should we find ourselves in breach of any data protection that may present a risk to your rights and freedoms, within 72 hours of us being notified, we will notify you and will remove the associated data without undue delay.

3.5. Other security measures

3.5.1. We employ appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

3.5.2. Data transmission over the internet is inherently insecure, and although we employ appropriate technical and organisational security measures to protect your personal information from unauthorised access we cannot guarantee the security of any personal information sent over the internet.

3.5.3. You are responsible for keeping your password and user details confidential. Nobody at Dot will ever ask you for your password, please ensure that you do not share your account details with anyone.

How and when we share your information.

4.1. Sharing your personal information

4.1.1. Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, we will not share, sell or distribute any of your personal information without your consent.

4.2. We may disclose your personal information to the following categories of recipients:

4.2.1. Third party service providers and partners who provide data processing services to us (including operating this website and in relation to our services, e.g. to verify your identity, to contact you on our behalf), or who otherwise process personal information on our behalf for purposes that are described in this Privacy Policy or notified to you when we collect your personal information.

4.2.1.1. Dot holds data with third party platform Intercom. Intercom data is stored within the EU (Ireland), and held in compliance with GDPR regulation. Intercom's Privacy Policy can be found [here](#).

4.2.1.2. Payments for Dot are taken through Stripe, an encrypted third party payments platform. Stripe's Privacy Policy can be found [here](#).

4.2.2. To any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, (iii) to protect your vital interests or those of any other person; or (iv) as otherwise required or allowed under applicable law.

4.2.3. To any other person with your consent to the disclosure.

4.2.4. In all accounts, these third parties may access, process or store your information to perform tasks only for the purposes that we have authorised, and we require them to provide at least the same level of protection for your information as described in our Privacy Policy.

4.3. Sharing with third parties

4.3.1. We may share with third parties aggregated or anonymised information that does not directly identify you.

4.3.2. Our website may contain links to other websites belonging to or operated by third parties. By making these links available, we are not endorsing third-party websites, their content, products, services or the owners of these third-party websites.

4.3.3. It is your responsibility to make sure that you obtain any information which may be relevant to making a decision, and that you read the privacy and security policy on such third-party websites.

How you can manage your data preferences, and your data protection rights.

5.1. Managing your communications preferences

5.1.1. You can manage your communications preferences at any time by clicking the “email preferences” link which can be found at the bottom of all Dot communications that are sent to you. This includes our Welcome email that is sent to you upon completing your registration on the website.

5.1.2. If you are unable to access your email preferences due to the absence of a Dot email (you have deleted all prior communications, for example) then you may contact us directly and we will send you an email with the appropriate link.

5.2. Data portability

5.2.1. You have the right to receive all personal data which you have previously provided to us, and this can be requested at anytime by contacting us directly. We will collate all of the relevant data and send this to you by email within 28 days of your request being made.

5.3. The right to be forgotten

5.3.1. Also known as Data Erasure, you have the right to be forgotten and can request at anytime that we erase all of your personal data, cease further dissemination of the data, and have third parties halt processing the data. You may unsubscribe or withdraw consent at any time either by contacting us directly or by managing your communications preferences.

5.4. Data retraction

5.4.1. You can make a formal request to retract all of your personal information at anytime by contacting us directly.

5.5. Other data protection rights

5.5.1. You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

Updates to this Privacy Policy, and how to contact us.

6.1. Updates to this Privacy Policy

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

6.1.2. You can see when this Privacy Policy was last updated by checking the “last updated” date displayed at the top of this Privacy Policy.

6.2. How to contact us

6.2.1. If you have any queries or concerns in relation to our Privacy Policy or our products and services, please contact us at: hello@dotresidential.com

6.2.2. Dot Residential, Canada House, Chepstow Street, Manchester M1 5FW.

6.2.3. Dot Residential Ltd (‘Dot’) is a registered company in England and Wales (Company #11070328), with its registered office at 15th Floor, 6 Bevis Marks, Bury Court, London EC3A 7BA. Dot is registered as a money broker with the Financial Conduct Authority (Firm #798812). Dot is registered with the Office of the Information Commissioner (Reg #ZA 304 390). Dot is a member of The Property Ombudsman (Member #T00724) and adheres to its Code of Practice.