

# Privacy Policy

This website is operated and provided by Infinity Store and Work Limited, “we”, “us”, “our”). In this Privacy Policy, references to “you” and “your” are references to a user of our website.

The Infinity Store and Work Limited Privacy Policy provides information on how we and any associated companies collect, use, secure, transfer and share your information. The policy also sets out your rights and who you can contact for more information. Please read this Privacy Policy carefully to understand our practices regarding your personal data and how we will treat it. Previous Privacy Policies are available on request.

In this Privacy Policy, your information is sometimes called “personal data”. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data as “processing” such personal data.

We are committed to safeguarding the privacy of our website visitors; this policy sets out how we will treat your personal information.

Please note that our websites are not intended for children and we do not knowingly collect data relating to children.

## 1. Who We Are

This policy applies to the following companies and websites:

- Infinity Store and Work Limited, The Moda Centre, Stirling Way, Borehamwood, WD6 2BW
- <https://www.infinitystoreandwork.com>

This policy also covers any additional personal data collected in our online web application, personal data that is collected through our websites, by telephone and through any related social media applications.

## 2. How to Contact Us

If you have any questions about this disclaimer, privacy policy, data protection generally or you wish to exercise your legal rights please contact us using the details set out below.

**Subject:** Privacy Policy Enquiry

**Address:** Infinity Store and Work Limited, The Moda Centre, Stirling Way, Borehamwood, WD6 2BW

**Email:** [hello@infinitystoreandwork.com](mailto:hello@infinitystoreandwork.com) **Telephone:** 020 8736 0222

## 3. What Personal Data We Collect About You

We may collect, use, store and/or transfer different kinds of personal data about you.

What we mean by personal data is any information about you from which you can be identified. We will limit the collection and processing of your personal data to what is necessary to achieve one or more of the purposes.

The personal data we collect may include some or all of the following:

- **Basic personal data** - to identify you such as your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth.
- **Your contact information** - including your email address, address and telephone numbers.
- **Financial information** - including bank account details, card payment details and transactional information and history.
- **Products and services** - provided to you.
- **Online information and activity** - based on your interaction with us, our websites and applications for example your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types, searches, site visits and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Images** - such as copies of your passport or drivers' licence or CCTV images.
- **Profile Data** - which may include your username and password, enquiries or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** - including statistical data including 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.

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.

We may also process certain special category personal data about you for specific and limited purposes such as detecting and preventing financial crime. We will only process such data where we have asked for your explicit consent or are otherwise lawfully permitted to do so. Such information may include 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.

Where permitted by law, we may process information about criminal convictions or offences and alleged offences for specific and limited activities and purposes such as to perform checks to prevent and/or detect crime and to comply with laws relating to anti money laundering, bribery and corruption, fraud, terrorist financing and international sanctions. It may involve investigating and gather information in relation to suspicious activity and sharing data with banks, law enforcement agencies and/or regulatory bodies.

## 4. How We Collect Personal Data

Your personal data comprises both personal and financial information and includes information provided to us including, some or all the following:

- a) Information you give to us directly where you:
  - contact us directly via telephone, letters or email;

- use our online contact forms, applications, emails;
- search for our services;
- apply for our properties or services electronically or otherwise;
- take part in discussion boards or other forms of social media;
- request marketing material to be sent to you;
- enter a competition, promotion or survey; and/or
- give us feedback or contact us.

b) Information we learn about you through our relationship and the way you interact with us.

c) Information we may receive from third parties which may include other companies who provide services or lease properties to you or us, credit reference, fraud prevention or government agencies.

d) Information we gather using technology, which you may use to access our services (an IP address for example or telephone number), and how you use technology (for example recognising behavioural patterns).

e) Information we gather from publicly available sources, such as the press, the electoral register, company registers and online search engines.

## 5. How and Why We Use Your Personal Data

We will only use your personal data where it is necessary to carry out our business activities and we are required to have one or more of the following reasons for using your personal data:

- **Performance of a contract** – the personal data we may need to deliver our services to you.
- **Legal obligation** – where we are required by law to process your personal data.
- **Legitimate interest** – where we are permitted to use your personal data where on balance the benefits of us doing so is not outweighed by your legal rights.
- **Consent** – where your agreement is sought prior to utilising your personal data. Wherever consent is the only reason for using your personal data you have the right to change your mind and/or withdraw your consent.

We will mainly use your personal data in the following ways:

a) When you apply for a lease, licence, product or a service (and throughout your relationship with us), we are required by law to collect and process certain personal data about you.

b) To perform checks and monitor transactions and location data for the purposes of detecting and preventing criminal activity in compliance with laws relating to anti money laundering, fraud, terrorist financing, bribery and corruption and international sanctions.

c) To check and share information held by us with fraud prevention agencies, law enforcement and other government agencies for the purpose of preventing, detecting and prosecuting financial crime and funding of terrorism.

d) To register you as a new client and to administer the agreement for occupation, including:

- Managing payments, fees and charges.
- Keeping an accurate history of transactions and sending you relevant statements.
- Communicating with you in relation to your lease for instance notifying you of any changes to rates or charges.
- Helping to resolve any problems or complaints you may have.
- Collect and recover monies where appropriate.

e) To manage our relationship with you including:

- Keeping you informed about changes to your service e.g. notification of price changes, changes in the way we administer your lease and any other legal or regulatory information.
  - Notifying you of changes to our terms and conditions.
  - Notifying you of changes to this document.
  - Asking you to leave a review or respond to a survey.
- f) To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we provide to you.
- g) To analyse and improve the running of our business, including contacting you for market research purposes.
- h) To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.
- i) To make suggestions and recommendations to you about our services which may be of interest to you.
- j) To ensure that each visitor to any of our websites can use and navigate the site effectively.
- k) Where you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.

## 6. Your Consent To Marketing

Generally, we do not rely on consent as a legal basis for processing your personal data, in certain circumstances, we are required to obtain your consent to the processing of your personal data and that includes when marketing products and services to you.

Your consent can either be opt in consent or soft opt in consent depending on whether you are an existing customer and what the consent is for. We will always get your opt-in consent before sending third party direct marketing communications to you.

### a) Opt-In Consent

- You have to give us your consent freely, without us putting you under any type of pressure.
- You have to know what you are consenting to – so we'll make sure we give you enough information.
- You should have control over which processing activities you consent to and which you do not. We provide these finer controls within our privacy preference centre.
- You need to take positive and affirmative action in giving us your consent – we are likely to provide an opt-in consent tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

### b) Soft Opt-In Consent

- In some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you if you are an existing customer who bought (or negotiated to buy) a similar product or service from us in the past, and we gave you a simple way to opt out both when we first collected your details and in every message we have sent, which are related to the services we provided, as long as you do not actively opt-out from these communications.
- For most people, this is beneficial as it allows us to suggest other products and services to you alongside the specific one you contacted us for. This significantly increases the likelihood of us being able to provide you with a better level of product or service which you may require. For other types of e-marketing, we are required to obtain your explicit consent.

You have the right to withdraw consent to marketing at any time by contacting us.

If you have opted out from our marketing communications, it is possible that your details may be recaptured through public sources in an unconnected marketing campaign. We will try to make sure this does not happen, but if it does, we are sorry, and we would ask that in those circumstances you opt out again.

## 7. Your Rights

You have several rights under data protection laws, the rights available to you depend on our reason for processing your information and are set out below:

- a) **Your right of access** - You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information. In most cases, this will be free of charge, however in some limited circumstances, for example, repeated requests for further copies, we may apply an administration fee.
- b) **Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.
- c) **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- d) **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.
- e) **Your right to object to processing** - You have the right to object to processing if we are able to process your information because the process forms part of our public tasks or is in our legitimate interests. \_
- f) **Your right to data portability** - The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.

## 8. Exercising Your Rights

In most circumstances you are not required to pay any charge for exercising your rights. We have one month to respond to you. To exercise your rights:

- email, call or write to us;
- let us have enough information to identify you e.g. account number, user name, registration details;
- let us have proof of your identity and address (a copy of your driving licence or passport, and a recent utility or credit card bill); and
- let us know the information to which your request relates, including any account or reference numbers, if you have them].

If you would like to unsubscribe from any email, you can also click on the 'unsubscribe' button at the bottom of the any email. It may take up to 7 days for this to take place.

You can access any of these rights at any time and if you wish to do so or require further information about your rights please contact us using the details above.

## 9. Sharing Your Personal Data

We may from time to time share your personal data with the following organisations who are also required to keep your information confidential, safe and secure:

- a) Any member of our group, which means any subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- b) Third parties, business partners, agents, professionals and suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- c) Analytics and search engine providers that assist us in the improvement and optimisation of our site, although ordinarily only non-personal information is shared.
- d) Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
- e) Where required as part of any proposed sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or business assets.
- f) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or otherwise permitted under law to do so, or in order to enforce or apply our terms of use and other agreements; or to protect our, our customers and others rights, property, or safety. This includes exchanging information with other companies and organisations for the purposes of fraud/crime protection and investigation and credit risk reduction.
- g) Anyone else with your permission.

## 10. Anti-Money Laundering Regulations

We must comply with certain regulations, notably the “Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to as “the Regulations).” We are required to obtain certain information from you to comply with the Regulations. The information provided will only be used by us in relation to comply with the Regulations and will not be shared with any other party outside of the company unless we are required to do so under law.

If you decide to apply for a property or enter a business relationship with us, you must comply with the Regulations.

We will require two separate Identification documents one primary and one secondary document even if it appears on both lists. The information may be required at various stages of the process.

### **Primary documents - proof of ID:**

- Valid Passport with MRZ
- Valid full UK photo driving licence
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Valid EU/EEA/Switzerland photo driving licence.

- Valid EU/EEA/Switzerland national Identity Card.
- Valid UK Armed Forces ID Card.
- Valid UK Biometric Residence Permit (copy of both sides.)
- Valid Blue disabled drivers pass. (With photo)
- Valid Freedom Pass
- Valid Local Authority Bus pass.
- Department for Works & Pensions letter confirming pension details including National Insurance Number dated within the last 12 months.

**Secondary documents - proof of residence:**

- Valid full UK photo driving licence.
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Local authority council tax bill (dated within the last 12 months).
- UK Bank / Building societies statements/bills showing activity, dated within the last six mths. Including account number and sort code (Internet printed acceptable).
- UK mortgage statement (dated within the last 12 months) (Internet printed acceptable).
- Utility bill dated within the last 6 months including - Electricity bill (with MPAN number), Landline, Gas, Satellite TV, Water (Internet printed acceptable) (Not mobile phone bills).
- Her Majesty's Revenue and Customs Inland Revenue Coding / assessment / statement (dated within the last 12 months) with National Insurance number.
- Department for Works & Pensions letter confirming pension details and NI Number (Dated within the last 12 months).

We reserve the right to employ third party electronic verification, soft search, for the purpose of verifying identity. This search will not affect your credit rating.

## 11. Transferring Personal Data Overseas

Data that you submit via our website is sent to and stored on secure servers. Data may be transferred to, and stored at a destination outside the European Economic Area ("EEA") and may also be processed by staff operating outside the EEA who work for us, or for one of our service providers, related companies, agents or contractors. Such transfers may be made to improve our website or to assist in our security activities.

We do not generally rely on your consent as the legal basis for transferring your personal data to outside the EEA, however where we feel it is necessary or appropriate we may seek to rely on your consent as the legal basis for such processing. Where we do, you may withdraw your consent at any time in the manner described.

## 12. Keeping Your Personal Information Secure

We ensure that there are appropriate technical, physical, electronic, and administrative safeguards in place to protect your personal details from unauthorised access.

We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.



All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password, which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet (including by email) is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **13. How Long Do We Hold Personal Data**

We retain your personal data for no longer than is necessary. The time periods for retaining data are determined by several factors including but not limited to the nature and type of record, the nature of the activity, the product or service, the country where companies may be located and any applicable legal or regulatory requirements.

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

Within our websites we may have links to third party websites, plug-ins and applications. Clicking those links may enable third parties to share or collect your personal data. We do not control such third-party websites and are not responsible for their privacy statements or the contents of those websites. We would encourage you to read the privacy policy of every website you visit.

### **15. Changes to The Privacy Policy**

We keep this document under regular review and any changes in the future will be posted on this page. We encourage you to review this page regularly to identify any updates or changes to our privacy policy.

### **16. Need Extra Help**

If you would like this notice in another format for example: audio, large print, braille), please contact us (see '[2. How To Contact Us](#)' above).

### **17. Changes to this Privacy Policy**

Any changes we make to our Privacy Policy in the future will be updated on this page and, where appropriate, notified to You by email. Please check back frequently to review this Policy and to see any updates or changes.

### **18. Complaints**

If You have any complaints about the way we use your personal information, please contact a company Director on [management@infinitystoreandwork.com](mailto:management@infinitystoreandwork.com) or 020 8736 0222, who will try to resolve the issue.



If we cannot resolve any issue, You have the right to complain to the data protection authority in your country. The supervisory authority in the UK is the **Information Commissioner**, who may be contacted at: <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

If you're not satisfied with our response, you can raise a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work or normally live, or where any alleged infringement of data protection laws occurred.