

Swoop Privacy Policy

In this privacy policy, we explain how Swoop collects and uses your personal information. This privacy policy applies to all personal information we process about you. Swoop is the data controller, and we are responsible for your personal data (referred to as "we," "us," or "our" in this privacy notice).

We have divided this privacy policy into different sections. Please click on the relevant section below for further information.

Contact Details

Our full details are:

- Full name of legal entity: Swoop Recruitment Ltd
- Email address: info@swooprecruitment.co.uk
- Postal address: Unit 6, 7 Eastfield's Avenue, London, United Kingdom, SW18 1RA

It is crucial that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at info@swoop.com.

What Information We May Collect and How We Use It

As a business, we collect, use, store, and transfer different types of personal data depending on who you are and how you interact with us. The personal data we collect, and use may include:

1. Identity Data

- Name
- Marital status
- Title
- Date of birth
- Gender
- Username and password
- Purchases made by you
- Your interests and preferences
- Employment details
- Feedback and survey responses

2. Contact Data

- Billing address
- Delivery address
- Email addresses
- Telephone numbers

3. Financial Data

- Bank account and payment details

4. Transaction Data

- Details about payments to and from you
- Other services you have purchased through us

5. Technical Data

- Internet protocol address
- Login information
- Browser type and version
- Time zone setting

- Browser plug-in types and versions
- Operating system and platform
- Identification number
- Online identifiers
- Location data and other similar identifying information required for the customer's device(s) to communicate with websites and applications on the internet

6. Usage Data

- How you use our website, products, and services
- The full uniform resource locators clickstream to, through, and from our site (including date and time)
- Download errors
- Lengths of visit to certain pages
- Page interaction information
- Methods to browse away from the page
- Any phone numbers you use to call us

7. Marketing and Communications Data

- Your marketing preferences from us and our third parties
- Your communication preferences

We may also collect and use Aggregated Data, which does not usually classify as personal data, but if linked to personal information, it will be treated as personal data in line with this policy.

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. You can ask us to rectify or update your personal information at any time by email to

info@swooprecruitment.co.uk

How Is Your Personal Data Collected

We use different methods to collect data from and about you, including through:

1. Direct Interactions

- You may provide us with your Identity, Contact, and Financial Data when you:
 - Apply for our services
 - Provide references and emergency contact details
 - Create an account on our website
 - Subscribe to our service or publications
 - Request marketing to be sent to you
 - Contact us through social media
 - Visit our physical locations or contact our call center
 - Enter a competition, promotion, or survey
 - Give us feedback

2. Third Parties or Publicly Available Sources

- We may receive personal data about you from various third parties and public sources, including but not limited to:
 - Providers of payment services
 - Data brokers or aggregators
 - Publicly available sources such as government registries

How We Use Your Personal Data

In the table below, we summarize the ways we plan to use your personal data and the purposes for which we will use it. We will only use your personal data for the purposes for which we have collected it. If we need to process your personal data for a different purpose that is not compatible with the original purpose that we collected your personal data, we will let you know. We may process your personal data for a different purpose and without your consent where it is necessary for us to comply with our legal obligations.

Purpose/Activity	Type of Data	Lawful Basis for Processing including Basis of Legitimate Interest
To contact you	Identity, Contact, Financial, Transaction, Marketing and Communications	-Performance of a contract with you Necessary for our legitimate interests (for running our business, to recover debts due to us, to keep our records updated, and to study how customers use our products/services)
To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products, and services you request from us	Identity, Contact, Financial, Transaction, Marketing and Communications	- Performance of a contract with you Necessary for our legitimate interests (for running our business and to recover debts due to us)
To provide you with information about other goods and services that we offer, which we feel may interest you	Identity, Contact, Technical, Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)
To permit selected third parties: To provide you with information about goods or services which we feel may interest you. To assist us in the improvement and optimization of advertising, marketing material and content, our services, and the website	Identity, Contact, Technical, Usage	Consent (in relation to SMS and email marketing communications) Necessary for our legitimate interests (to develop our service offering)
To assist us in the improvement and optimization of advertising, marketing material and content, our services, and the website	Identity, Contact, Financial, Transaction, Marketing and Communications	- Necessary for our legitimate interests (to develop our products/services and grow our business and provision of administration and IT services)
To notify you about changes to our service	Identity, Contact	Performance of a contract with you Necessary to comply with our legal obligations. Necessary for our legitimate interests (to keep our records updated)

Purpose/Activity	Type of Data	Lawful Basis for Processing including Basis of Legitimate Interest
To ensure that content from our website is presented in the most effective manner for you and your computer	Identity, Contact, Financial, Transaction	Necessary for our legitimate interests (to develop our products/services and grow our business and provision of administration and IT services)
To verify your identity	Identity, Contact, Financial, Transaction	Necessary to comply with our legal obligations. Necessary for our legitimate interests (for running our business and to prevent fraud and money laundering)
As part of our efforts to keep our site safe and secure and to prevent or detect fraud	Identity, Contact, Financial, Transaction	Necessary to comply with our legal obligations. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and in the context of a business reorganization or group restructuring exercise)
To provide customer support	Identity, Contact	Performance of a contract with you
To facilitate and enable you to partake in a property viewing, open house event, or visits to property marketing suites	Identity, Contact	Performance of a contract with you Necessary for our legitimate interests (for running our business and to develop and grow our business)
To comply with the requirements imposed by law or any court order	Identity, Contact, Technical, Usage	Necessary to comply with our legal obligations

Disclosures of Your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in the "Purposes for which we will use your personal data" table above. We have agreements in place with our third parties that restrict their use of your personal data. We only allow third parties to use your personal data for specified purposes and in accordance with our instructions.

External Parties

- Service providers acting as processors based in UK who provide IT and system administration services, anti-money laundering service providers, and services to enable us to perform our contract with you.

- Property developers acting as Processors or independent controllers based in [Country] who process your personal data to arrange and facilitate your visit to their marketing suite.
- Advertisers and advertising networks (including social media) that require the data to select and serve relevant adverts to you.
- Professional advisers acting as processors or joint controllers, including lawyers, bankers, auditors, and insurers based in UK who provide consultancy, banking, legal, insurance, and accountancy services.
- Regulatory authorities, such as [Relevant Regulatory Authorities], acting as processors or joint controllers, who require reporting of processing activities in certain circumstances.

-

Other Parties

Sometimes there may be third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

Where Your Personal Information Is Held

Information may be held at our offices and those of our third-party agencies and service providers in paper and digital form.

How Long Your Personal Information Will Be Kept

We will keep your personal information while you have an active matter with us, when we believe you may be interested in our services, or when we are providing services to you. We will keep your personal information, as a minimum, for as long as necessary:

- To respond to any questions, complaints, or claims made by you or on your behalf.
- To show that we treated you fairly.
- To keep records required by law.

And thereafter, [Specify duration, e.g., 5 years from any last communication with you] for marketing of our services to you as detailed above under "How and why we use your personal information" and under "Marketing communications."

We will not retain your personal information for longer than necessary for the purposes set out in this policy.

International Transfers

We will not transfer your personal data outside of [Relevant Geographic Region], except to a country offering the same level of protection for your personal data. However, at times we may have overseas employees and contractors who will have access to your data. When this happens, we will make sure that they are contractually obligated to follow the policies and procedures set out in this document.

Your Legal Rights

Under data protection laws, you have the right to protect and look after your personal data. You have the right to:

- Ask us for the personal data that we hold and process about you (this is commonly known as a data subject access request).
- Ask that any inaccurate information we hold about you is corrected.
- Ask that we delete the personal data we hold about you in certain situations.
- Ask that we stop using your personal data for certain purposes.
- Ask that we do not make decisions about you using completely automated means.
- Ask that personal data we hold about you is given to you, or where technically feasible, a third party chosen by you, in a commonly used, machine-readable format.

The rights listed above may apply in certain circumstances, and so we may not always be able to comply with your request to exercise these rights. We will usually respond to a request from you to exercise your rights within 1 month of receipt, but it might take longer if your request is particularly complex or if you have made a number of requests. Please be aware that we may need to process your personal data and/or request specific information from you to help us comply with your request. You will not usually have to pay a fee to exercise these rights, but we reserve the right to do so if your request is clearly unfounded, repetitive, or excessive, alternatively, we may refuse to comply with your request.

How to Complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. 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.

How to Contact Us

Please contact us by post, email, or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Unit 6, 7 Eastfield's Avenue, London, United Kingdom, SW18 1RA

Info@swooprecruitment.co.uk

020 7610 9004