LEGAL

Privacy And Cookie Policy

This Privacy Policy was last updated on 30th of OCTOBER 2026.

BACKGROUND:

GVN REALITY TRADING LTD understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.gvnestateinvest.com ("Our Site"), and of every client who uses our client portal, C.P.V.C, at console.gvnestateinvest.com ("the Client Portal"). We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested.

Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account"

means an account required to access and/or use certain areas and features of Our Site, including the Client Portal;

"Client Portal"

means C.P.V.C (Content & Portfolio Visualization Console), the private area at console.gvnestateinvest.com where our clients follow their purchase and see their property portfolio, documents and tasks. An Account is created for you only when you buy one of our packages;

“Cookie”

means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and

“Cookie Law”

means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Information About Us

Our Site is owned and operated by GVN REALITY TRADING LTD, trading as GVN Estate Invest; a Limited company registered in England and Wales under company number (16127907).

Registered Address: GVN REALITY TRADING LTD, HIGHFIELD HOUSE, CONGLETON ROAD, STOKE-ON-TRENT, ST7 3SY
Email address: info@gvnestateinvest.com
Telephone number: +44 1782 938 111.

3. What Does This Policy Cover?

This Privacy Policy applies to your use of Our Site and of the Client Portal, and to the personal data we hold when you enquire with us, book a call, buy one of our packages, accept an agreement or become our client. It also covers the personal data we hold if we write to you about a property you own or are responsible for (see Parts 6, 7 and 8). Our Site may contain links to other websites. Please note that we have no control over how your data is collected,

stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.

- The right to object to us using your personal data for a particular purpose or purposes. If we have written to you about a property, you can tell us at any time to stop, by phone, by email, or with the “Stop the letters” button on the page the letter’s code takes you to. We will stop straight away and keep the address on our do-not-contact list so that we never write to it again.
- The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling.

We do not make decisions about you by automated means. Where our team uses an AI service, its suggestions are only a starting point: a member of our team reads them and decides what, if anything, to do. Nothing an AI service writes is sent to you without a person reading and approving it first.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

6. What Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies.

Data Collected	How We Collect the Data
Identity Information including name, title date of birth, gender	Online form, via conversation, or in person meeting
Contact information including address, email address, telephone number.	Online form, via conversation, or in person meeting
Enquiry details, including what you are looking for, your budget and timescale, details and photographs of a property you want to sell, and the date and time of any call you book with us. If you reached our form through one of our campaign links (for example from a leaflet, letter or advert), we also note that campaign's short code, so we know which of our campaigns you responded to. Nothing is stored on your device for this.	Online forms on Our Site, our call booking page (provided by Cal.com), conversation or in person meeting
Account information: your email address and the password you choose. Your password is held only in scrambled (hashed) form by our sign-in provider; we never see it. A profile photo, if you choose to add one.	When we create your Client Portal Account, and when you set your password or update your profile
Property and portfolio information, including property addresses, purchase prices, valuations, mortgage balances and interest,	From you, from your purchase and refurbishment with us, and entered by us in the Client Portal

Data Collected	How We Collect the Data
rent, running costs, tenancy and safety certificate dates, refurbishment and maintenance costs, and monthly snapshots of these figures.	
Documents, such as certificates, tenancy agreements, valuations and invoices, uploaded to the Client Portal.	Uploaded by you or by us
Purchase and agreement records: the package you buy, its fees, your billing address, the dates you pay, and when you accept or cancel your agreement, together with the internet (IP) address and browser used to accept it.	From you, and recorded automatically when you accept or cancel an agreement online
Payment records: the amounts and dates of payments you make to us by bank transfer. We do not take or store card details.	From you and from our bank records
Technical and security information: when you send a form on Our Site, a security check (Cloudflare Turnstile) that confirms a person rather than an automated program is sending it, and a scrambled code made from your internet (IP) address, which we cannot turn back into the address and use only to limit how many forms can be sent from one connection in a day. When you sign in to the Client Portal, your internet (IP) address and browser, unsuccessful sign-in attempts, and the same security check.	Automatically, when you send a form on Our Site or use the Client Portal

Data Collected	How We Collect the Data
If we write to you about a property: the property's address; where the address came from a deceased estates notice, the name of the person who has died as it appears in the notice; a copy of the letter we sent and the short code printed on it; and whether and when that code was used, or you asked us not to write again.	From public records: deceased estates notices published in The Gazette, a property's title register bought from HM Land Registry for that property, and councils' public registers of licensed houses in multiple occupation; from our own visits to a street; and from you, if you reply. We do not buy mailing lists.

7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you on Our Site.	Name, Email, Contact Number.	Consent provided by you.
Providing and managing your Account.	Notes relating to our discussions and your needs.	Legitimate interest in providing the best service.
Administering our business.	Notes relating to our discussions and your needs.	Legitimate interest in providing the best service.

What We Do	What Data We Use	Our Lawful Basis
Supplying our services to you.	Notes relating to our discussions and your needs.	Legitimate interest in providing the best service.
Managing payments for our services.	Payment for our services.	Consent provided by you. We will only process payments following consent from you.
Communicating with you.	Notes relating to our discussions and your needs..	Legitimate interest in providing the best service..
Booking and holding a strategy call with you.	Name, email, phone number, the date and time you choose.	Steps you ask us to take before entering into a contract.
Preparing, sending and recording your agreement, and invoicing you.	Name, contact details, billing address, package and fees, payment dates, and the time, IP address and browser used to accept or cancel.	Performance of our contract with you; legal obligation to keep accounting records; legitimate interest in being able to show when and how an agreement was accepted.
Providing the Client Portal: showing your purchase progress, your properties and	Account information, property and portfolio	Performance of our contract with you.

What We Do	What Data We Use	Our Lawful Basis
their figures, your documents and your tasks, and emailing you when there is something for you to do.	information, documents, purchase records.	
Keeping the Client Portal and your Account secure, including limiting repeated wrong passwords and checking that sign-ins come from a person.	Email address, IP address, browser, sign-in attempts.	Legitimate interest in protecting your data and our systems.
Protecting our forms from spam and misuse: checking that a person is sending a form, and accepting no more than five forms a day from the same email address or the same connection.	Email address, the scrambled code made from your IP address, the result of the security check.	Legitimate interest in protecting our systems and our team from spam and misuse.
Writing by post to the owner of a property, or to the family of someone who has died, to ask whether they would consider	The property's address, the name in a deceased estates notice, the letter, its	Legitimate interest in finding properties to buy. We have weighed this against your interests: we make first contact by post; we only ever phone a number that has been checked against the Telephone

What We Do	What Data We Use	Our Lawful Basis
selling it to us, and recording any reply.	code and any reply.	Preference Service, and we never send unsolicited texts or emails; we wait for a period after a death notice before writing, and write to bereaved families in gentle terms; every letter says where we found the address and how to stop further letters; and we stop as soon as we are asked.
Keeping a do-not-contact list.	The address, the date and the reason (for example, that you asked us not to write).	Legitimate interest in making sure we never contact you again once you have asked us not to.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including name, title, date of birth and gender.	For as long as you are registered with our databased and for a period of up to 28 days following a request for deletion.
Contact information including address, email address and telephone number.	For as long as you are registered with our databased and for a period of up to 28 days following a request for deletion.
Payment records (amounts and dates paid). We do not take or store card details.	For as long as the law requires us to keep accounting records, normally six years.
Client Portal information: Account, property and portfolio information, documents and tasks.	For as long as you are our client and for a period of up to 28 days following a request for deletion, except where we must keep something by law.
Agreements and invoices, including the record of when and how an agreement was accepted.	For as long as the law requires us to keep them, normally six years, and for as long as they may be needed to establish or defend a legal claim.
Records of unsuccessful sign-in attempts (email address and IP address).	30 days, after which they are deleted automatically.

Type of Data	How Long We Keep It
The scrambled code made from your IP address when you send a form.	Kept with your enquiry, for as long as we keep the enquiry itself (see Identity and Contact information above).
Records of letters we have sent about a property, and any reply.	Up to two years after our last contact, unless you become our client or ask us to delete them sooner.
The do-not-contact list.	For as long as we write to property owners, so that we can make sure we never write to you again. It holds only the address, the date and the reason.

9. How and Where Do You Store or Transfer My Personal Data?

Our database, Client Portal Accounts and uploaded documents are stored in the United Kingdom (London), with our database provider, Supabase. Some of the service providers listed in Part 10 are based in, or may process data in, the United States or elsewhere outside the UK.

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data, or under the safeguards set out in each provider's data processing terms, as the Data Protection Legislation allows. For further information about adequacy decisions and adequacy regulations, please refer to the Information Commissioner's Office.

Please contact us using the details below in Part 15 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- in the Client Portal, each client can see only their own information, enforced by the database itself, and documents are reached only through short-lived private links;
- encrypted (HTTPS) connections, passwords held only in hashed form, a limit on repeated wrong passwords, a security check at sign-in and on our forms, a daily limit on how many forms one person or connection can send, and automatic sign-out of our staff systems after a period of no use;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

10. Do You Share My Personal Data?

We do not sell your personal data, and we will not share it with any third parties for their own purposes, subject to the following exceptions.

We use the following service providers to run Our Site, the Client Portal and our business. They handle personal data only on our instructions and only to provide their service to us:

- **Supabase** – our database, sign-in and file storage (stored in London, UK);
- **Render** – hosts Our Site and our applications;
- **Cloudflare** – network security and the security check (Turnstile) at sign-in and on our forms;
- **Resend** – sends our emails, such as form confirmations, your Client Portal welcome email, agreements and invoices;

- **Cal.com** – our call booking page, which adds your booking to our Google Calendar;
- **postcodes.io** – turns a property postcode into a map location in our internal systems (only the postcode is sent).
- **OpenFreeMap** – supplies the street maps shown in our internal systems; it sees which map area is being shown and the IP address of our team member's device, but no names or contact details.
- **Anthropic** – an artificial intelligence (AI) service that our team can choose to use inside our internal systems, to help with our own work: summarising the public records about a property, tidying a note we have dictated, picking out the name of the firm dealing with an estate from a published notice, and suggesting what a street photograph of a property shows. Anthropic uses this information only to give us its answer. Under its business terms it does not use it to train its AI models, and it deletes it within 30 days, unless its safety systems flag it for a misuse check, when it may keep it for up to two years. Anthropic is based in the United States (see Part 9).

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. How Can I Control My Personal Data?

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the

ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. Can I Withhold Information?

You may access Our Site without providing any personal data at all.

You may restrict our use of Cookies. For more information, see Part 14.

13. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three

months from the date we receive your request. You will be kept fully informed of our progress.

14. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services.

We do not use advertising or analytics Cookies. The Client Portal keeps you signed in by storing a sign-in token in your browser's own storage; this is strictly necessary for the Client Portal to work and is removed when you log out. When you sign in, the Cloudflare Turnstile security check reads information from your browser to confirm that you are a person. If you use our call booking page, Cal.com may place its own Cookies, which are covered by Cal.com's privacy policy.

15. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: info@gvnestateinvest.com
Telephone number: +44 1782 938 111.
Registered Address: GVN REALITY TRADING LTD, HIGHFIELD HOUSE, CONGLETON ROAD, STOKE-ON-TRENT, ST7 3SY

16. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

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