

Privacy Policy

Effective Date: 25 July 2025

Momentum Asset Management Limited T/A National Homebuyers ("we", "us", or "our") is committed to protecting and respecting your privacy. This Privacy Policy outlines how we collect, use, store, and protect your personal data, and how you can exercise your rights. It is written in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025.

1. Who We Are

Momentum Asset Management Limited T/A National Homebuyers is a property purchasing business. We are the Data Controller for the purposes of UK data protection law. Our contact details are:

Address: Sterling House, 20 Victoria Way. Burgess Hill, RH15 9NF
Email: help@nationalhomebuyers.co.uk
Phone: 01444 257111
Data Protection Contact: Privacy Compliance Officer

2. Personal Data We Collect

We may collect and process the following categories of personal data:

- Identity data (e.g. name, title)
- Contact data (e.g. phone number, email address, postal address)
- Property-related data (e.g. address of property, valuation)
- Technical data (e.g. IP address, browser type)
- Communication data (e.g. correspondence, call recordings)

3. How We Use Your Data

We process personal data for the following purposes:

Purpose	Lawful Basis
To provide property valuation and buying services	Performance of a contract
Customer service communications	Legitimate interests

Marketing our services	Consent (or Legitimate interests, where appropriate)
Legal and regulatory compliance	Legal obligation
Fraud prevention and security	Recognised legitimate interests (security)

4. Recognised Legitimate Interests

Under the Data (Use and Access) Act 2025, we rely on "recognised legitimate interests" for certain processing activities, including:

- Security and fraud prevention
- Internal analytics and service improvement
- Responding to emergencies or safeguarding concerns

Where applicable, we have conducted Legitimate Interests Assessments (LIAs) to ensure a fair balance with your rights and freedoms.

5. Cookies and Tracking

We use cookies to improve user experience, analyse website usage, and provide marketing. Where cookies are not strictly necessary, we ask for your consent via our cookie banner.

You can manage your preferences at any time via the "Cookie Settings" link.

Some low-risk cookies (e.g. anonymised analytics) may be exempt from consent under PECR as amended by the 2025 Act.

6. Automated Decision Making

We may use automated systems to assist in property valuations or marketing segmentation. These decisions will not have a legal or similarly significant effect on you.

Where such decisions involve special category data or have legal effects, we will ensure:

- A human is involved in the review
- You have the right to object and request manual intervention

7. Data Sharing and Transfers

We may share your data with:

- Professional advisers and legal representatives

- IT and cloud service providers
- Regulatory and legal authorities, where required

We only transfer personal data to countries outside the UK where:

- The country has been deemed by the UK Government to have standards "not materially lower" than the UK
- Standard contractual clauses or appropriate safeguards are in place

8. Data Retention

We retain your personal data according to the following schedule:

- General enquiry data: 12 months after last contact
- Transactional data: 7 years post-sale (for legal/tax reasons)
- Cookie data: As per cookie type and consent record

9. Your Rights

You have the right to:

- Access your personal data
- Correct inaccurate data
- Request deletion of your data
- Restrict or object to processing
- Data portability
- Withdraw consent at any time
- Lodge a complaint with the Information Commissioner's Office (ICO)

Data Subject Access Requests (DSARs):

We will respond within one month. If we need to verify your identity or clarify your request, the one-month timeframe pauses ("stop-the-clock") until resolved. Complex requests may be extended by up to two additional months.

We will conduct only reasonable and proportionate searches.

10. Children

We do not knowingly collect or process children's data. Where this becomes necessary (e.g. inheritance cases), we will apply additional safeguards in line with the UK Age Appropriate Design Code.

11. Updates

This policy was last updated on 24 July 2025. We may update this policy periodically and will notify users of significant changes on our website.

12. Contact Us

For any privacy-related queries or complaints, please contact us at:

Email: tom@jvrconsultancy.com

Phone: 07834 039328

13. Complaints to the ICO

If you are unhappy with how we handle your personal data or respond to a request or concern, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent authority for data protection.

You can contact the ICO using the details below:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Website: <https://www.ico.org.uk>

Helpline: 0303 123 1113