

# Homes Privacy Policy

## 1.1 Introduction

This privacy policy explains what we do with your personal information, what we do to keep it secure, where we collect it as well as your rights in relation to the personal information we hold about you.

We are committed to ensuring that your privacy is protected. Any personal information given will only be used in accordance with this privacy policy. This notice is subject to any additional terms or other agreements you have with St. Modwen and any applicable laws.

St. Modwen Homes Limited is the data controller as defined by data protection legislation, and is a group company of St. Modwen Properties Limited.

## 1.2 Why do we need your Personal Information?

We will process your personal information prior to entering into a contractual agreement with you, or to perform an existing contractual arrangement, to meet our legitimate business interests or where it is needed to comply with a legal obligation. We process your information:

- To provide you with the information you have requested regarding a property/development
- To enable the sale or potential sale of a new home
- To maintain information about home plots
- To process payments and refunds
- To enable support from the emergency repair service and out of hours helpline
- To improve our products and services
- For customer and user administration
- For sales, promotional, marketing, advertising and campaigns including promotional information about 3<sup>rd</sup> parties we think you may find interesting
- For handling enquiries
- For internal record keeping
- To conduct research, testing and analysis with regards to our business relations
- To measure and analyse the effectiveness of our advertising to allow us to send more relevant advertising to you.

No automated decision-making is conducted on your personal data.

We will inform you where we need your consent to process your personal information.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required to do so by law.

### 1.3 How do we collect your Personal Information?

- We collect personal information directly from you when you register your interest via our website, when you provide your information on a recommend a friend form, when we meet with you at our sales sites and via other communications between us, when you make enquiries with, or purchase a property from us; including:
  - your name, date of birth, home address(es), home and mobile telephone number(s), email address(es) and employment information
  - financial details such as salary and bank account details
  - information about your transactions with us
  - Information or documentation you provide about yourself, such as identity documents
  - records of written and verbal communications between us either electronic or written
  - CCTV images if you attend our premises where we use CCTV recording
- We may also collect your Personal Data from third parties, for example:
  - from searches of Credit Reference Agencies (CRAs) and Fraud Prevention Agencies (FPAs) of their records relating to you
  - from public records (e.g. the electoral roll)
  - from estate agents
  - from other third parties with your consent (for example your solicitor or mortgage broker)
  - From social media with your consent such as Facebook or Instagram.
- When accessing our website, we will collect:
  - IP address (number that is automatically assigned to your computer whenever you use the Internet)
  - Type of device you access the website from
  - Type of Internet browser software used
  - St. Modwen Homes website pages that you visit and
  - Date and duration of your visit to our website.

### 1.4 Who do we share your Personal Information with?

Sometimes we need to share your information with 3<sup>rd</sup> parties for the following reasons:

- With NHBC for National New Homes Survey and Homebuyers Guarantee
- With trusted tradespeople such as tilers, electricians, or plumbers to report and deal with defects or issues
- With trusted 3<sup>rd</sup> parties who provide research, reviews, and marketing services to St. Modwen Homes
- With utility providers for connection of services like gas and electricity
- With Help to Buy schemes on your behalf
- With WorldPay when processing payments and refunds

### 1.5 How long will we keep your Personal Information for?

We won't retain your personal information for longer than necessary; we'll establish this by considering legal requirements and guidance on the relevant best practice. We will only use your personal data for the purposes for which it was obtained. Should we need to use your personal information for any other purpose we will take appropriate steps to notify you in advance of the change.

### 1.6 Where will your Personal Information be Processed?

Unless otherwise listed below your personal information will be processed by St. Modwen in the United Kingdom subject to contractual restrictions regarding confidentiality and security in line with applicable information protection laws and regulations.

- WorldPay may process your personal information relating to payments and refunds in the EEA and the United States.
- Google Analytics may process your personal information relating to use of our website (see section below)

## 1.7 Use of Website Cookies - Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer to help us analyse how visitors use our site. The information about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google use this information to evaluate your use of our website, compiling reports on your website activity for pages visited, the duration and bounce rate, while providing other miscellaneous services relating to website activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other information held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the website.

By using our website, you consent to the processing of information about you by Google in the manner and for the purposes set out above. If you want to prevent your information from being used by Google Analytics, you may download the optout browser here: <https://tools.google.com/dlpage/gaoptout?hl=en>

This privacy policy does not cover the links within our website linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## 1.8 How is your Personal Information secured?

We have technical and organisational security measures in place to protect your personal information against unauthorised access, misuse, loss or destruction including:

- Implementing access controls to our information technology, such as firewalls, ID verification and logical segmentation and/ or physical separation of our systems and information
- Never asking you for your passwords
- Advising you never to enter any unique identifiers such as account numbers or passwords into an email or after following a link from an email, and
- We will not disclose your personal information to parties who are not authorised to process them.

## 1.9 How do you control what your Personal Information is used for?

If you'd like to stop receiving news and offers or promotional information about 3<sup>rd</sup> parties from us, you can do so in the following ways:

- Whenever you complete a 'Register Your Interest' form on our website, you will be asked to indicate if you would like to receive direct marketing such as offers and news
- Whenever you return a 'Recommend a Friend' form to our site office, you will be asked to indicate if you would like to receive direct marketing such as offers and news
- Whenever you receive an email from us you can click the unsubscribe link in the footer of the email.
- If you have previously agreed to us sending you offers, news or promotional information about third parties you may change your mind at any time by writing to or emailing us at [sales@stmodwenhomes.co.uk](mailto:sales@stmodwenhomes.co.uk).

## 1.10 What if I enter a competition or marketing campaign?

When you enter any of our competitions, advertising campaigns, marketing or promotional activity, you should be aware that any personal data that you provide about you, any children or any other person(s) in any text, post, photo, video or images, including your name, relevant St Modwen development and your location in connection with that competition or marketing campaign will be used in internal and external publications and in different media such as social media platforms and posts, online and paper based campaigns. We rely on legitimate interests to promote, market and advertise our business when using and processing such personal data. Prize-winners surname and country location will be made available on request in accordance with the CAP code and the Campaign terms and conditions.

Items posted on social media may be accessible in different countries that do not have laws with the same level of protection for your personal data as in the UK. You should only provide personal data that you and those in those

items are comfortable sharing with others. Please do not provide personal data or images that you or they would not want to be publicly available.

Your personal data (name, relevant St Modwen development and location, opinions, videos and images) provided to us will be posted on Facebook, Instagram, LinkedIn, Pinterest, Twitter, You Tube, Google Images and other social network sites. Each of these sites has their own terms and conditions, privacy and cookie policies that will apply to their processing of your personal data. You can obtain a copy of these terms and notices by visiting their sites. Information on these sites is public, viewable and generally searchable around the world. It can also be re-shared anywhere.

Where we rely on our legitimate interests to use personal data, you have the right to object to that use by contacting us at [sales@stmodwenhomes.co.uk](mailto:sales@stmodwenhomes.co.uk). We will make an assessment as to whether there is a basis for us to continue using that personal data and inform you of the outcome of our assessment. For example, it may be your personal data and images will not be used in future publications but may continue to appear in publications already in circulation.

### 1.11 What rights do you have?

Under data protection legislation you have rights regarding how your personal information is collected, used and shared. You have the right to access or obtain a copy of the personal information that we have collected about you, or to review, modify, delete, or to request that we stop processing such personal information.

You also have the right to lodge a complaint with us and/or the UK Information Commissioner's Office (ICO).

You can find out more information about your rights by visiting the ICO website here <https://ico.org.uk/>

If you are seeking to exercise any of these rights, please contact us using the details in the "Contact Us" section below.

### 1.12 Contact Us

If you have any queries about how we use your personal information, or if you want to exercise any of your rights under data protection legislation you can contact the St. Modwen Group Data Protection Officer (DPO) by post or email using the details below:

**Group Data Protection Officer**  
**St. Modwen Properties Limited**  
**Park Point**  
**17 High Street**  
**Longbridge**  
**Birmingham**  
**B31 2UQ**  
**Email: [protectinginformation@stmodwen.co.uk](mailto:protectinginformation@stmodwen.co.uk)**

Please note that we will need to verify your identity before we can fulfil any of your rights under data protection law. This helps us to protect the personal information belonging to our customers against fraudulent requests.

### 1.13 Policy Changes

This privacy policy was most recently updated in August 2021.

We may change this privacy policy from time to time by updating this page. If we make any substantial changes we will take appropriate steps to bring those changes to your attention.