

LONDON NEWCASTLE

Website - Privacy Policy

1 **INTRODUCTION**

- 1.1 Thank you for visiting our website. This privacy policy set out how the London & Newcastle group of companies (“**London Newcastle**” or “**We**”) processes the personal information of our website visitors. It also describes the cookies we may use and send to your computer or mobile device. Please note that this privacy policy is not an exclusive description of how London Newcastle processes the personal information of individuals.
- 1.2 If you use London Newcastle’s products or services further information will be provided as part of the engagement process.
- 1.3 If you are an employee or contractor of London Newcastle, the information about how we handle your personal information as an employee is provided to you upon commencing your employment or contract, as applicable, with us.

2 **HOW WE COLLECT PERSONAL INFORMATION**

- 2.1 We will collect and store your personal information when you interact with our website. We may collect personal information in writing, by telephone, by e-mail and by online applications, including through registering on our website.
- 2.2 London Newcastle collects personal information directly from the individual to whom it relates, except where that individual has consented to London Newcastle collecting the personal information from a third party or the law otherwise permits London Newcastle to do so.
- 2.3 When you visit our website we may automatically collect information about your computer or device, including your IP address, information about your visit, your browsing history, and how you use the website. This information may be combined with other information you provide to us, as described above.

3 **WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU**

- 3.1 Personal information means any information relating to a person that enables them to be identified either directly or indirectly. Personal information that we hold about you may include your:
 - 3.1.1 name;
 - 3.1.2 address;
 - 3.1.3 email address;
 - 3.1.4 phone number;
 - 3.1.5 IP address;
 - 3.1.6 location data;
 - 3.1.7 details of your budget;
 - 3.1.8 the size and type of property you are interested; and
 - 3.1.9 the source of your enquiry.
- 3.2 We will take reasonable steps to ensure the personal information that we store is accurate, complete and up-to-date.

4 **HOW WE USE YOUR INFORMATION**

- 4.1 We will use your personal data, and may share your personal data with other parties acting on our behalf, for one or more of the following purposes:
 - 4.1.1 respond to requests which you have submitted via our website and to deal with on-going matters relating to such requests;
 - 4.1.2 send you marketing information on our property developments;
 - 4.1.3 send you information on future phases of our property developments;
 - 4.1.4 keep you informed of any activities undertaken by us which we believe may be of interest to you;
 - 4.1.5 offering our services to you in a personalised way;

- 4.1.6 to conduct research about the use of our website;
- 4.1.7 to assess, respond to and resolve a complaint you might make to us;
- 4.1.8 to notify you about changes to our goods and services;
- 4.1.9 for our own administrative purposes, including training our staff, conducting internal audits or transferring assets as part of a sale, purchase or investment in the business;
- 4.1.10 for market research purposes and for developing and improving our products and services;
- 4.1.11 to conduct investigations of suspicious or harmful activity; and
- 4.1.12 to comply with London Newcastle's regulatory and legal obligations.

4.2 We do not sell your personal information to others.

4.3 If we wish to use your personal information for a purpose beyond that for which it was originally provided, we will ask for your consent or seek to rely on another valid legal ground to process your personal information in accordance with the applicable law.

5 **INFORMATION FOR MARKETING PURPOSES**

5.1 Where you have consented to us using your personal data for marketing purposes, we may use your information to conduct marketing and data analysis or to send you updates and news concerning London Newcastle and its business partners which may be of interest to you.

5.2 If at any time after you have consented to us using your information for marketing purposes and you wish us to stop using your information for these purposes, please email us at info@londonnewcastle.co.uk.

6 **GROUNDS FOR PROCESSING**

6.1 To process your data lawfully we need to rely on one or more valid legal grounds. The grounds we may rely upon include:

- 6.1.1 your consent to particular processing activities. For example, where you have consented to us using your information for marketing purposes;
- 6.1.2 our legitimate interests as a business (except where your interests or fundamental rights override these). For example, it is within our legitimate interests to use your data to prevent or detect fraud or abuses of our website; or
- 6.1.3 our compliance with a legal obligation to which London Newcastle is subject. For example, we have a duty to investigate and respond to complaints made against us and may need to process your personal information as part of such investigation.

7 **DISCLOSURE OF YOUR PERSONAL INFORMATION**

7.1 There are circumstances where we may wish to disclose or are compelled to disclose your personal data to third parties. This will only take place in accordance with the applicable law and for the purposes listed above. These scenarios include disclosure:

- 7.1.1 to our subsidiaries, branches or associated offices;
- 7.1.2 to our outsourced service providers or suppliers to facilitate the provision of our services, for example, the disclosure to any real estate agents of your contact details where you indicate that you are interested in a particular development;
- 7.1.3 to third party service providers and consultants in order to protect the security or integrity of our business, including our databases and systems and for business continuity reasons;
- 7.1.4 to another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event. In the case of a merger or sale, your personal data will be permanently transferred to a successor company;
- 7.1.5 to legal advisors who may need to manage or litigate a claim;
- 7.1.6 to public authorities where we are required by law to do so; and

7.1.7 to any other third party where you have provided your consent.

8 **INTERNATIONAL TRANSFER OF PERSONAL DATA**

8.1 We may transfer your personal data to a third party in countries outside the EU for further processing in accordance with the purposes set out in this policy. In particular, your personal data may be transferred throughout the London Newcastle group and to our outsourced service providers located abroad. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation, contractual or other lawful means.

8.2 We may disclose your information to any person as required by law and specifically to any government agency if we believe in good faith that we must do so to comply with the law or that doing so is required to prevent, detect, investigate or remedy improper conduct potentially affecting London Newcastle.

9 **RETENTION OF PERSONAL INFORMATION**

Your personal information will be retained for as long as it is necessary to carry out the purposes set out in this privacy policy (unless longer retention is required by the applicable law). However, we will not retain any of your personal information beyond this period and the retention of your personal information will be subject to periodic review. We may keep an anonymised form of your personal information, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so.

10 **CONFIDENTIALITY AND SECURITY**

10.1 London Newcastle is committed to:

10.1.1 seeking to safeguard all personal information that you provide to us;

10.1.2 seeking to ensure that it remains confidential and secure; and

10.1.3 taking all reasonable steps to ensure that personal privacy is respected.

10.2 All our data is stored in written or electronic form on our servers and computers and in various physical locations. We maintain physical, electronic and procedural safeguards to protect your personal information from misuse, unauthorised access or disclosure and loss or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members, joint venture partners, subsidiary companies and third parties who need to know that information for the purposes set out in this privacy policy.

11 **YOUR RIGHTS WITH REGARDS TO YOUR PERSONAL INFORMATION**

11.1 Data protection law provides individuals with certain rights, including the right to: access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of, their personal information. Individuals also have the right to lodge a complaint with the relevant information protection authority if they believe that their personal information is not being processed in accordance with the law. Further information about your rights is set out below:

11.2 **Right to rectification.** You may request that we rectify any inaccurate and/or complete any incomplete personal information. If we disagree and believe the information to be accurate and complete, we will advise you and include a notation on the record that you dispute the information's accuracy. Requests for corrections or supplements to all other personal information should be made to us at info@londonnewcastle.co.uk. We will respond to your request to correct or supplement your personal information within a reasonable time period and, in any event, within any time period specified in relevant laws.

11.3 **Right to withdraw consent.** You may, as permitted by law, withdraw your consent to the processing of your personal information at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent. Please note that if you withdraw your consent, you may not be able to benefit from certain service features for which the processing of your personal information is essential.

- 11.4 **Right to object to processing.** You may, as permitted by law, request that we stop processing your personal information.
- 11.5 **Right to erasure.** You may request that we erase your personal information and we will comply, unless there is a lawful reason for not doing so.
- 11.6 **Your right to lodge a complaint with the supervisory authority.** We suggest that you contact us about any questions or if you have a complaint in relation to how we process your personal information. However, you do have the right to contact the relevant supervisory authority in the relevant country directly.

12 **LINKS**

Our website provides hyperlinks to websites owned and controlled by others. London Newcastle is not responsible for the privacy practices of any website that it does not own or otherwise control.

13 **THIRD PARTIES**

Where you submit information on behalf of another person, you confirm that you have made that person aware of how we may collect, use and disclose their information, the reason you have provided it, how they can contact us, the terms of this policy and that they have consented to such collection, use and disclosure.

14 **COMPLIANCE WITH PRIVACY LAWS**

- 14.1 London Newcastle complies with the data protection and privacy laws to which it is subject. You should satisfy yourself that you are familiar with those laws, including any exceptions which may apply under them. You should also be aware that privacy laws in various jurisdictions may change from time to time.
- 14.2 Except to the extent expressly stated otherwise in this policy, London Newcastle accepts no obligations with respect to the handling of personal information other than those mandated by law in the country which has, or counties which have jurisdiction over London Newcastle in any given circumstances.

15 **COOKIES**

- 15.1 This section of the policy explains what cookies are, why we use them and what you may do if you wish to restrict, remove or refuse to accept cookies. By continuing to use this website, you agree to the use of cookies for the purposes set out in this policy.

What is a cookie?

- 15.2 A "cookie" is a small file of letters and numbers that is sent to your computer by a website and automatically saved on your computer by your web browser (e.g. "Internet Explorer"). Each time you request a page from the website, your web browser sends this cookie back to the website server.
- 15.3 Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the website's owners and third parties.
- 15.4 Cookies allow a website to recognise your computer or mobile device. Cookies do not identify you as an individual, but do identify the computer or mobile device you use to access the Internet and can therefore be used to collect information about your use of the Internet. Cookies do not allow access to any information stored on your computer or mobile device.

Why do we use cookies?

- 15.5 The cookies we use are "analytical cookies" sent by Google Analytics. We use cookies for the following purposes:
 - 15.5.1 to determine the number of visitors to our website and to identify how visitors move around the site and, in particular, which pages they visit. This allows us to improve our website and our services;
 - 15.5.2 to determine from where in the world our website is being visited so that we can ensure sufficient coverage; and

- 15.5.3 to collect information, where available, about your computer or mobile device for system administration purposes, such as your IP address, operating system and browser type.
- 15.6 We will only use information collected through the use of cookies to evaluate our website's effectiveness and to improve your experience when you visit it. Cookies are not used by us to identify who you are or send you targeted advertising.
- What cookies are set by our website?***
- 15.7 London Newcastle uses Google Analytics session cookies to provide meaningful reports about site visitors. Google Analytics cookies do not collect personal information about website visitors. Cookies set via our website include those listed below:
- Controlling and deleting cookies***
- 15.8 When you accessed this website, cookies were sent to your web browser and stored on your computer or mobile device. If you wish to restrict, remove or refuse to accept cookies which are set by any website (including this website), you should do this through the browser settings for each browser you use to access the Internet. The Help function within your browser should tell you how to do so.
- 15.9 To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>. For further information about how to restrict, remove, and refuse to accept cookies, visit www.aboutcookies.org or www.allaboutcookies.org. Note, however, that in some cases, restricting, removing or refusing to accept cookies may reduce the functionality of, or prevent access to, this and other websites.
- 16 **CHANGES TO THIS POLICY**
- As we strive to improve our practices, we may review this policy from time to time. We reserve the right to change this policy at any time and to notify you of those changes by posting an updated version of this policy on our website. It is your responsibility to check our policy each time before you access our website for any changes.