

YOUR PRIVACY AND THIS POLICY

We take the privacy of your personal information very seriously and know that you will wish to understand how we will use your personal information.

This Privacy Policy:

- will inform you about what personal information we collect and why, how we use it, who we share it with, as well as giving you other important information;
- covers personal information collected via our website as well as information that you may provide when corresponding directly with us.

WHICH PERSONAL INFORMATION DO WE COLLECT?

Personal information that you provide voluntarily:

- Contact information, such as your name, postal address, telephone number, mobile phone number, and email address;
- Details of the type of property that you are interested in purchasing, such as number of bedrooms, location, price range, transport link requirements;
- Details of how interested you are in making a purchase and when you are looking to buy;
- Details of your current property status, including whether it has been sold or if it is up for sale and whether or not you are in a chain;
- Details of your financial circumstances, such as whether you are purchasing by way of a mortgage or other means and if you are planning to live in the property or purchasing it as an investment.
- Where you have provided your feedback we will record your opinions and the text that you have written;
- Details of your marketing preferences and whether you are happy to receive marketing communications via Email, Telephone, Post or Text Message;

There are generally no adverse effects for you if you choose not to provide your personal information. You will still be able to use our website to view properties, download brochures or request copies of them in person when you are in one of our marketing suites. However, without some of this information, we may not be able to communicate with you and/or take certain actions that you request, for example because this personal information is required to respond to your enquiries.

Cookies and Personal Information that is collected automatically:

- A cookie is a small text file which is placed onto your computer (or other electronic device) when you use our website.
- When you visit our website, we may automatically collect standard internet and website log information and details of patterns about how website visitors behave. The information we collect includes information about your internet service provider, your operating system, browser type, domain name, the internet protocol (IP) address of your computer (or other electronic Internet-enabled device), your access times, the website that referred you to us, the web pages you request and the date and time of those requests. This may allow us to find out which parts of the website are popular or need changing. This is done in a way which does not identify any individual and we do not try to identify visitors to our website or to link this information with any personal information we collect.
- You can set your browser not to accept cookies and the website below tells you how to disable cookies from your browser. However, some of our website features may not function as a result.

For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: <http://www.allaboutcookies.org/manage-cookies/>.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Personal Information provided by you:

The main way that we collect your personal information from you when you provide it to us. This could be through our website or when speaking to one of our sales staff, either in person, via email or on the telephone.

Personal information provided by third parties:

Occasionally we may receive information about you from other sources (such as Estate Agents), which we may add to the information we already hold about you in order to help us provide our products and services to you.

We may receive your initial name and contact details from an introducer or other person(s) acting as agent on your behalf.

Additionally property sales portals (such as Rightmove and Zoopla) and social networks (such as Facebook and Instagram) may pass your information onto us where you have given them permission to do this and registered your interest through an advertisement on one of their websites.

WHY WILL WE USE YOUR PERSONAL INFORMATION?

Uses of your information:

The most common purposes for which we will use your information are:

General communication:

We will use your information to communicate with you and provide you with the details of properties that you have requested and to respond to any enquiries you may have.

Understanding your property search requirements:

- We will use the information that you provide to us to try to find the right property for you.
- We will use the details of when you are looking to buy to assess how interested we believe you are in making a purchase from Allies.
- We will use the details you provide to us about your current property status and your funding arrangements to assess your ability to proceed with any purchase you may wish to make.
- We will use the details of the type of property that you are interested in purchasing; the above information and your direct marketing preferences to inform you about properties that we believe may be suitable to you.

DIRECT MARKETING:

Where you have expressly given us consent, we may send you information about new property developments and or services which may be of interest to you. We will only do

this where you have agreed to it and using your preferred methods of communication.

We will do our best only to send you information about news, offers and the latest properties that could be suitable for you. To help with this we will ask for information about you – the more we know about the type of property you are interested in, the easier it will be for us to find the right property for you from the right Group company.

We ask for your consent to receive marketing materials on behalf of The Allies Group and the companies within its Brands for simplicity's sake, as all of our Brands build properties and there is often an overlap in the areas of the country in which they build. This gives you the best opportunity to find the home that is right for you.

You can unsubscribe/withdraw your consent and ask us to stop sending you marketing materials at any time by notifying us at info@allies.london.

We keep a record of when we receive consent from individuals and regularly review consent to check updates to preferences. We act on withdrawals of consent as soon as we can. Please note, if you ask us to stop marketing to you, then you will cease receiving marketing from all of Allies' Brands.

Additionally and as required, we may use your information:

- To analyse and improve Allies' products and services
- For general business administration
- To comply with our legal, contractual and regulatory obligations
- To comply with court orders and to exercise or defend legal rights

WHAT ARE THE LEGAL GROUNDS FOR ALLIES USING YOUR INFORMATION?

- Depending on which of the above purposes for which your information is used, it will be processed on one or more of the following legal grounds:
- The processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;
- The processing is necessary to comply with a legal obligation to which Allies is subject;
- The processing is necessary for the purposes of Allies' legitimate interests or those of any third party that receives your personal information, except where these are overridden by your interests or fundamental rights and freedoms.

The only exception to the above is the sending of direct marketing materials, which we will only do with your consent.

WHO WILL WE SHARE YOUR PERSONAL INFORMATION WITH?

We may disclose your information to our third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include cloud services providers (such as hosting and email management), or other third parties who provide services to us. These include but are not limited to IT service providers, solicitors, auditors and any agents acting on your behalf.

When we use third party service providers, we will retain control over and we will remain

fully responsible for your personal data and we will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers.

Your personal data may be shared with and used by other Allies companies, within the Brands that may have properties that are suitable for you.

We may also share your personal information with law enforcement and regulatory agencies.

PERSONAL INFORMATION ABOUT OTHER PEOPLE THAT YOU PROVIDE TO US

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and that:

- They have given their consent for their details to be passed to the relevant Allies Group company;
- You will pass on a copy of this Privacy Policy to them.

Keeping your personal information safe

We will use technical and organisational measures to safeguard your personal information, for example:

- our IT systems are protected by firewalls; regular software updates; anti-virus protections and intrusion detection systems; and
- we store your personal information on secure servers located in the UK and Europe.

While we will use all reasonable efforts to safeguard your personal information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information that is transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (see 'How can you contact us?' below).

TRANSFERRING YOUR PERSONAL INFORMATION ABROAD

We do not intend to transfer your personal information outside the EEA. If we believe a transfer of your personal information outside of the EEA will arise, we will implement contractual or other measures to comply with legal requirements on the transfer of personal information, ensuring that there is an adequate level of protection in place.

Where you are located outside the EEA then we will transfer your personal information to the UK and Europe where our systems and servers are located. This will naturally entail your personal information being exported back out to the jurisdiction that it originated from or from where you are located (for example when we reply to your emails or we write to you).

HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION FOR?

Your personal information will be deleted when it is no longer reasonably required for the relevant purposes and we are not legally required or otherwise permitted to continue storing such information. Allies will, in particular, retain your personal information where required for us to assert or defend legal claims until the end of the relevant retention period or until the claims in question have been settled.

The criteria that we use to assess how long to hold your personal information for in our sales and marketing database is a combination of whether or not you have previously purchased from the Group and when you last interacted with us.

Where you have not purchased a property from us, if we have not had any interaction with you in five years then we will remove your information from our sales and marketing database. The reason for the five year period is that property purchases are made infrequently (our evidence suggests an average of five years between purchases) and because the Allies Group prides itself on the number of repeat purchasers who buy from us on multiple occasions. This does not affect your rights in relation to your information.

Where you have purchased a property from us, your information will be retained as necessary for the performance of ongoing contractual and legal obligations will have been entered into. Further information on this will be provided at the time of purchase.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

Subject to certain legal conditions, you have the following rights in relation to the personal information that we hold about you. These are:

- The right to request a copy of the information we hold about you;
- The right to correct any mistakes in your information;
- The right to erase certain information;
- The right to request a restriction of the processing of your information;
- The right to object to certain information and automated decisions being processed;
- The right to withdraw your consent to direct marketing;
- The right to transferring your personal information in a structured file (data portability).

Should you wish to exercise any of your rights, please contact us directly (see 'How can you contact us?' below) and we will be happy to assist.

Please note that we may ask for proof of your identity and address (such as a copy of your driving licence or passport – please do not send any original documents).

Additionally, you should be aware that not all of these rights are absolute and there may be circumstances in which we will not fully comply with your request because of a specified legal ground or exemption. For example, you will not be able to request that we delete all of your information if you have purchased a property from us because it will be necessary for the contract you have entered into. We will always let you know the legal basis for this.

We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your information, and for any additional copies of the personal information you request from us.

CHANGES AND UPDATES TO THIS PRIVACY POLICY

We reserve the right to update and change this Privacy Policy from time to time in order to reflect any changes to the way in which we process your personal information or changing legal requirements. In case of any such changes, we will post the changed Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they are posted on this website.

This policy was last updated on 01 October 2018.

HOW TO CONTACT US

If you wish to email us, please use info@allies.london. We will endeavour to send you a response as soon as possible. Your patience is much appreciated during busy periods.

Your right to lodge a complaint with the Information Commissioner's Office

You have the right to complain to the Information Commissioner's Office (ICO) if you believe we have not handled your request in an appropriate manner. However, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

For information on contacting the ICO please see their website at www.ico.org.uk.