AUTUMNHILL, OWNED BY AUTUMNHILL PROPERTIES LIMITED ("AHPL") IS COMMITTED TO PROTECTING YOUR PRIVACY WHEN DEALING WITH YOUR PERSONAL INFORMATION. THIS PRIVACY POLICY SETS OUT HOW AHPL COLLECTS AND SHARES YOUR PERSONAL INFORMATION. PLEASE READ THIS PRIVACY POLICY CAREFULLY.

## 1. INTRODUCTION

### **ABOUT US**

In this Privacy Policy references to "we" or "us" or "AHPL" are to: AutumnHill Properties Limited, a company registered in England and Wales (company number 12825591) with registered address at 5 Winchester Terrace, Newcastle upon Tyne, NE4 6EH.

If you have any questions about how we collect, store or use your information, you may contact us by e-mailing us at <a href="mailto:hello@autumn-hill.co.uk">hello@autumn-hill.co.uk</a> or by writing to us at 5 Winchester Terrace, Newcastle upon Tyne, NE4 6EH.

## CHANGES TO THE POLICY

We may change the content of our website and how we use cookies without notice, and consequently our Privacy Policy may change from time to time in the future. We therefore encourage you to review our Privacy Policy when you visit the website from time to time to stay informed of how we are using personal information.

This Privacy Policy was last updated in March 2023.

Further notices highlighting particular uses (such as direct marketing) that we wish to make of your personal information may also be provided to you when we collect certain personal information from you together with the ability to opt in or out of certain uses.

2. WHAT PERSONAL INFORMATION DO WE COLLECT AND PROCESS? INFORMATION YOU PROVIDE TO US

Personal information that we receive may include: First name, Surname, Contact details, Financial details, Gender, Date of Birth, Information from identification documents, for example a passport showing nationality.

### CORRESPONDENCE

If you contact us, we may keep a record of that correspondence and our response to you.

#### **WEBSITE USAGE**

Data collected via cookies. Please see our section on cookies for information on how we use cookies.

## 3. HOW DO WE COLLECT PERSONAL INFORMATION?

We collect your personal information: in person, by email, by phone, via our website.

## 4. WHO DO WE COLLECT PERSONAL INFORMATION FROM?

We collect personal information from: you, an agent acting on your behalf of our PR agencies and suppliers.

# 5. WHAT DO WE USE YOUR PERSONAL INFORMATION FOR?

We have set out below the reasons why we use your personal information and the legal basis for using your personal information for that particular purpose.

# COMMUNICATE WITH YOU ABOUT OUR DEVELOPMENTS, FOR EXAMPLE AN INVITATION TO A LAUNCH

We use your personal information for this reason because you have provided your consent for us to do so.

We are committed to sending you only marketing communications that you have clearly expressed an interest in receiving. Our email communications will provide you with an option to opt-out of further communications. Alternatively, at any time, you may opt-out by contacting us to update your preferences.

# PROMOTING OUR DEVELOPMENTS ON SOCIAL MEDIA. WE MAY PROCESS DATA WHERE YOU COMMUNICATE/CONNECT WITH US

Processing is necessary in the legitimate interests of promoting our developments.

#### MANAGE APPOINTMENTS TO VIEW OUR DEVELOPMENTS

Processing is necessary because we have a legitimate interest in arranging and managing viewings one of our developments.

## MANAGE THE LETTING OR SALE AT OUR DEVELOPMENTS

Processing is necessary to enter into and perform the contract for sale or lease.

#### SEND POSTAL MAILINGS ABOUT OUR DEVELOPMENTS

Processing is necessary in the legitimate interests of our business to promote our developments to local residents.

#### MANAGE ANY ISSUES OF OUR DEVELOPMENTS RAISED BY INDIVIDUALS

Processing is necessary in the legitimate interests of managing our developments.

# MANAGE COMPANIES PROVIDING SERVICES TO US

Processing is necessary in our legitimate interests in contacting and dealing with individuals involved in providing services to us.

# TRACK USER MOVEMENTS AND INTERACTION WITH CONTENT ON OUR SITE, VIA COOKIES

Processing is in the legitimate interests of our business to effectively manage our content and site visitors, and also to improve our services. For more information, see the section on cookies.

# BUSINESS MANAGEMENT AND RECORD KEEPING OF OUR BUSINESS

Processing is necessary in the legitimate interests of managing the financial and business affairs of our business.

INFORM YOU OF CHANGES TO AHPL, IF PART OF A RE-ORGANISATIONAL CHANGE WHERE WE MAY NEED TO TRANSFER SOME OR ALL OF YOUR

PERSONAL INFORMATION TO THE RELEVANT THIRD PARTY (OR ITS ADVISORS), YOUR PERSONAL INFORMATION WOULD CONTINUE TO BE USED FOR THE SAME PURPOSES SET OUT IN THIS POLICY OR FOR THE PURPOSE OF ANALYSING ANY REORGANISATION

Processing is necessary to achieve the legitimate interest, of allowing us to make changes to how we operate.

#### FOR LEGAL OR REGULATORY OBLIGATIONS

We may use your information in order to comply with a legal obligation that we are subject to. We may use your information to achieve the legitimate interest of, notifying potential money-laundering, pursuing a legal claim or in order to cooperate with law enforcement, court services or regulatory authorities.

## FAILURE TO PROVIDE PERSONAL INFORMATION

Certain information must be provided so that we can enter into a contract for sale or tenancy with you, e.g your contact details and identification details.

Certain information may also need to be provided so that we can comply with our regulatory obligations, e.g money laundering compliance.

Without this information we may not be able to proceed with the letting or purchase of a property.

## 6. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

#### DISCLOSURE TO PROPERTY MANAGEMENT AND LETTING AGENCIES

We may disclose your information with certain companies that manage lettings, where appropriate.

# DISCLOSURE TO COMPANIES CARRYING OUT DUE DILIGENCE

We may disclose your information with certain companies in order to perform due diligence checks on lettings and purchases.

#### DISCLOSURES TO THIRD PARTIES

We disclose your information in order for you to use our website, in order to communicate with you and with processors we use to assist us in our communications. You can contact us for details of specific disclosures made in respect of your information.

# 7. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We only keep your information for as long as necessary in relation to the purpose for which we are processing that information. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Where your personal information is no longer required we will ensure it is securely deleted.

# 8. INTERNATIONAL DATA TRANSFERS

AHPL does not transfer information collected about you outside of the European Economic Area ("EEA").

If you are located outside of the EEA, we will in communicating with you be transferring your personal data to your location. Data protection laws outside of the EEA may be of a lower standard and so there may be a risk in your data may being transferred out of the EEA. The basis of this transfer is that you consent to this transfer or that it is necessary in performance of a contract with you.

# 9. COOKIES

## WHAT ARE COOKIES?

The web site uses a small number of non-intrusive cookies.

Cookies are small text files that are placed on your computer, mobile phone or tablet by web sites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to web site owners.

We may use data gathered from your use of our website to analyse and adapt the site in order to manage our space effectively. We may also use this data for trouble shooting, data analysis, testing, maintaining security and safety.

#### WHAT TYPE OF COOKIES DOES OUR WEBSITE COLLECT?

We collect cookies through Google Analytics, in order to: distinguish users throttle request rates. To find out more, please visit – <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=en">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=en</a>

To opt out of being tracked by Google Analytics, please visit – <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a>

#### CAN I CONTROL THE USE OF MY COOKIES?

Most web browsers (including Chrome, Internet Explorer, Firefox and Safari) allow you to control your cookie settings and to delete any cookies already stored on your computer or other device.

You can control the use of cookies on your device, including deleting and blocking the cookies we and other sites use, through the browser settings on your device, but please note that any changes you make may affect your ability to properly use this web site.

To find out more about the way cookies work, how to see what cookies have been set and how to manage and delete them, visit <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a>

# 10. YOUR RIGHTS

You have certain rights, under data protection legislation, in relation to the personal information that we hold about you. These rights are subject to certain exemptions such as public interest (e.g. prevention of crime) and our interests (e.g. maintaining legal privilege).

Under certain conditions, you may have the right to require us to: provide you with further details on the use we make of your personal information, provide you with a copy of the personal information we hold about you, update any inaccuracies in the personal information we hold about you, delete any of your personal information that we no longer have a lawful ground to use, where processing is based on consent, stop that particular processing by withdrawing your consent, object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights, restrict how we use your personal information whilst a complaint is being investigated transfer your personal information to a third party in a standardised machine-readable format.

We are obliged to keep your personal information accurate and up to date. Please help us to do this by advising us of any changes to your personal information.

If you are not satisfied with our use of your personal information or our response to any request by you to exercise your rights, or if you think that we have breached any relevant data protection laws, then you have the right to complain to the Information Commissioner's Office, the UK's Data Protection supervisory authority.