

# Privacy Policy

At Homes by Carlton, we are committed to respecting your privacy rights, and maintaining the security of your data is our top priority. Additionally, we are dedicated to being transparent about the data we collect from you and how we use it.

This Privacy Policy acts to explain how we may use any personal information we collect about you, how we comply with the law on data protection, and what your rights are.

The Policy is intended for Homes by Carlton (referred to as Homes by Carlton, we, us or our) customers and visitors and by visiting our website, showhomes, or reserving and/or purchasing a home with us, you are agreeing to be bound by this Policy.

Homes by Carlton Limited is a company registered in England and Wales under registered number 10964384. The registered address is Carlton House, 15 Parsons Court, Welbury Way, Aycliffe Business Park, County Durham, DL5 6ZE.

If you have any questions about this Policy or how we process your personal data, please contact us at [dataprotection@homesbycarlton.com](mailto:dataprotection@homesbycarlton.com).

## I. The Personal Information We Collect About You

We will gather personal data from you when you contact us by phone, visit our website, engage with our social media platforms, make inquiries, visit our offices or developments, or participate in any transaction with us.

The categories of personal information we may collect include:

### 1.1. **Contact Information**

Your name and title, address, phone number(s), personal email address, and any other contact details you provide. If you are a corporate customer, such as a housing association, this may also include the name of your organisation and your job title.

### 1.2. **Identification Information**

This is any information we collect to verify your identity, such as your passport, driving licence, bank account details, utility bills, internet protocol (IP) address – where it is used for identification purposes – or any other identification data.

### 1.3. **Profile Information**

Purchases or orders you have made, your interests, preferences, feedback, and responses to surveys.

# Privacy Policy

## 1.4. **Website Data**

Information on how you use our website, products, and services, including your navigation to, through, and from our site (with date and time), as well as any products you have viewed or searched for.

## 1.5. **Video Surveillance Data**

We use CCTV on our sites to ensure safety and prevent crimes against our staff, customers, visitors, equipment, and properties.

## 1.6. **Marketing Preferences Data**

We may gather information about your marketing preferences if we are authorised to send you marketing materials, as well as your communication preferences, including on social media messaging platforms.

## 1.7. **Financial Information**

This includes mortgage, bank account and payment card details.

## 1.8. **Attendance Data**

Information regarding your attendance at a Homes by Carlton development or other locations for meetings or events.

## 1.9. **Technical Data**

Your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, platform, and other technology used on the devices you use access our website.

We also collect, use, and share aggregated data, such as statistical or demographic information, for various purposes. Aggregated data may be derived from your personal data but is not classified as personal data under the law, as it will not directly or indirectly reveal your identity.

## 2. How We Collect Your Personal Information

We will collect your personal information in the following ways:

### 2.1. **Information You (Or A Joint Purchaser) Provide**

This includes Contact and Identification Information you/they provide to us when you/they contact us in person, by telephone, email, post, or through our website, and when you/they reserve a property to purchase from us.

# Privacy Policy

## **2.2. Information Gathered Through Automated Technologies Or Interactions**

When you interact with our website, we will automatically collect personal data that identifies you from other users through the use of cookies. We may also receive information about you if you visit other websites that use our cookies.

## **2.3. Information Gathered Through Third Parties**

We may collect personal information about you from financial and legal advisors, as well as estate agents. We may also obtain information about you from other individuals at the development where you have purchased a home, and from any workers or contractors who interact with you regarding any home or other products or services you have purchased from us. Social media platforms may provide us with data where you have permitted them to do so.

## **2.4. Information We Observe**

We will collect personal information about you through the monitoring of our systems, including the use of telephones, emails, our social media sites, the internet (including our website), and via CCTV.

## **2.5. Information We Create**

We will generate information about you when we create an account for you and maintain records of our interactions with you or our suppliers, including payments you make. We also create information about you when we develop a customer profile to better understand our customers' behaviour, activities, preferences, and needs, to improve and enhance our products and services, and to send you marketing and advertising messages tailored to your profile.

We will only collect any Special Categories of Personal Data about you (which includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data) when it is necessary to comply with our statutory obligations.

# Privacy Policy

## 3. How We Use Your Personal Information

Purpose	Type Of Personal Information	Lawful Basis For Processing
<p>Marketing properties and developments that may be of interest to you, as well as our services, products, and schemes that could potentially appeal to you.</p>	<ul style="list-style-type: none"> <li>- Contact Information</li> <li>- Profile Information</li> <li>- Website Data</li> <li>- Marketing Preferences</li> <li>- Data</li> </ul>	<p><b>Consent:</b> You have requested that we send you details of specific properties and/or developments. Additionally, we may have obtained your explicit consent.</p> <p><b>Legitimate Interest:</b> We have a legitimate interest in marketing our properties and developments to you in order to generate new sales.</p>
<p>Customer correspondence and engagement including social media, complaints, surveys and feedback.</p>	<ul style="list-style-type: none"> <li>- Contact Information</li> <li>- Identification Information</li> </ul>	<p><b>Legal Obligation:</b> The use of your personal information is necessary to enable us to comply with regulations, respond to complaints, and fulfil our obligations under the Consumer Code and New Homes Quality Code (NHQC).</p> <p><b>Legitimate Interest:</b> We have a legitimate interest in retaining and maintaining various information about you, which enables us to respond to your queries, complaints, and correspondence, as well as to improve our service for you and others.</p>
<p>Process and manage your property purchase from us and provide after-sales services where relevant.</p>	<ul style="list-style-type: none"> <li>- Contact Information</li> <li>- Identification Information</li> <li>- Financial Information</li> </ul>	<p><b>Legal Obligation:</b> The use of your personal information is required to manage and fulfil the contract with you concerning your property purchase.</p>

# Privacy Policy

Purpose	Type Of Personal Information	Lawful Basis For Processing
<p>New Homes Warranty and Aftercare to address any warranty issues with your new home, including the use of contractors and/or manufacturers to resolve snagging and other matters related to your home and its appliances.</p>	<ul style="list-style-type: none"> <li>- Contact Information</li> <li>- Identification Information</li> </ul>	<p>As part of our contract with you, we provide a warranty for the home you've purchased. If we need to carry out any work on the home under this warranty or for any other reason, we will use your data to contact and liaise with you regarding the required work. This may involve sharing your data with our subcontractors, who will carry out the work on our behalf, as well as with suppliers and manufacturers of the products installed under the guarantee.</p>
<p>The use of data analytics to enhance our website, products/services, marketing, and customer relationships and experiences.</p>	<ul style="list-style-type: none"> <li>- Website Data</li> <li>- Technical Data</li> </ul>	<p>We rely on your consent to analyse the data we hold about you in order to improve our products and services and to provide content that reflects your preferences. We obtain your consent via the cookie consent notice, and you can opt out of such analytics through the same notice.</p>
<p>Investigate fraud, misconduct, health and safety issues, site security, and anti-social behaviour.</p>	<ul style="list-style-type: none"> <li>- Identification Information</li> <li>- Attendance Data</li> <li>- Video Surveillance Data</li> </ul>	<p><b>Legal Obligation:</b> We have several legal obligations concerning anti-money laundering and health and safety, and will process your personal information in accordance with these obligations.</p> <p><b>Legitimate Interest:</b> We have a legitimate interest in knowing who is on our sites, whose vehicles are present, and where they are parked. This helps us maintain security and ensure health and safety on site.</p>

# Privacy Policy

Purpose	Type Of Personal Information	Lawful Basis For Processing
Continue	Continued	It is also in our legitimate interest to use personal information, where necessary, to investigate claims and protect our business and customers, including safeguarding them from criminal or anti-social behaviour. This may involve sharing personal data with law enforcement agencies and our insurers, as well as monitoring you via CCTV systems.
Management of our IT systems and network security.	<ul style="list-style-type: none"> <li>- Contact Information</li> <li>- Identification Information</li> <li>- Website Data</li> <li>- Technical Data</li> </ul>	<b>Legitimate Interest:</b> It is in our legitimate interest to ensure the efficient operation of our business (including our website), which encompasses troubleshooting, data analysis, testing, system maintenance, support, reporting, data hosting, provision of administration and IT services, network security, and measuring the effectiveness of our website.
To obtain insurance policies and to respond to and defend against legal claims.	<ul style="list-style-type: none"> <li>- Identification Information</li> <li>- Attendance Data</li> <li>- Video Surveillance Data</li> </ul>	<b>Legitimate Interest:</b> It is in our legitimate interests to use your personal information when necessary for the purchase of insurance policies and to respond to and defend legal claims. Occasionally, we may need to process special category data in order to establish, exercise, or defend legal claims.

## 4. Your Personal Information And Your Rights

# Privacy Policy

You have the right to:

## 4.1. Request access to any personal information we hold about you.

- You have the right to access a copy of your personal information. We aim to respond to all requests within one (1) calendar month. In some cases, if your request is particularly complex or if you have made multiple requests, it may take us longer than a month. In such cases, we will inform you and keep you updated on the progress of your request.
- We may ask for information from you to confirm your identity and ensure that you have the right to access the personal information you have requested. This is a security measure to ensure we do not disclose personal information to anyone who is not authorised to receive it. We may also contact you for additional information related to your request.
- Typically, you will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request is clearly unfounded or excessive (particularly if the requests are repetitive). Alternatively, if your request is deemed unfounded or excessive, we may refuse to fulfil it.

## 4.2. Request that we rectify any inaccurate personal information we hold about you.

- Rectification allows you to have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new data you provide.

## 4.3. Request the erasure of personal information, in certain circumstances.

- This right allows you to request the erasure of your data (the "right to be forgotten"). It applies only to personal information we hold at the time you make the request, and there are some important restrictions on this right.
- The right to erasure applies in the following cases:
  - Where our use of your personal information is no longer necessary for the purpose for which we collected it. Most of the personal information we hold about you is required for managing our relationship with you as a customer, supplier, site visitor, website user, or social media user. However, we will review the information we hold about you if you request its erasure, to ensure we still need all of it.
  - If we have relied on your consent as the basis for processing and you withdraw that consent.

# Privacy Policy

- If we are processing your personal information on the basis of legitimate interests and you withdraw your consent unless we have overriding grounds to continue processing.
- If we are processing your personal information unlawfully.
- If we must erase it to comply with a legal obligation.
- The right to erasure does not apply in certain circumstances, including where:
  - We must process the personal information to comply with a legal obligation.
  - We use the personal information to carry out tasks in the public interest, such as investigating fraud or preventing/detecting unlawful activities.

#### **4.4. Request the restriction of processing of your personal information, in certain circumstances.**

- This allows you to ask us to suspend the processing of your personal information in the following scenarios:
  - If you want us to verify the accuracy of the information
  - If our use of the information is unlawful but you prefer that we do not erase it
  - If you need us to retain the information, even if we no longer require it, for the purpose of establishing, exercising, or defending legal claims.
  - If you have objected to our use of your information, but we need to verify whether we have overriding legitimate grounds to continue using it.

#### **4.5. In certain circumstances, request that we provide your personal information in a portable format that can be transmitted to another controller without difficulty.**

- We will provide you, or a third party you designate, with your personal information in a structured, commonly used, machine-readable format. Please note, this right only applies to automated information that you initially provided consent for us to use or where we processed the information to fulfil a contract with you.

#### **4.6. Object to certain types of processing, including direct marketing, legitimate interest-based processing, and automated processing (including profiling).**

- If we are processing your data for direct marketing purposes (for example, targeting advertisements to you based on the information we hold, or sending you direct communications such as emails, texts, or social media messages promoting our products or services), you have the right to object. However, please note that even if you object to marketing messages, we can still send you service messages related to the products or services we are providing to you and that are reasonable for us to provide.

# Privacy Policy

- If we are processing your personal data based on legitimate interests, and there is something specific about your situation that makes you want to object to the processing, particularly where you feel it impacts your rights and freedoms, you may object. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information that override your interests, rights, and freedoms, or that the processing is necessary for the establishment, exercise, or defence of legal claims.

## 4.7. The right to withdraw consent.

- If we are processing your personal information based on your consent, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing we have undertaken based on your consent prior to its withdrawal.
- If you provided your consent for the processing of your personal information, you have the right to withdraw your consent at any time, where applicable. Please contact [dataprotection@homesbycarlton.com](mailto:dataprotection@homesbycarlton.com) if you wish to do so.

If you wish to exercise any of the rights set out above, please make your request in writing to [dataprotection@homesbycarlton.com](mailto:dataprotection@homesbycarlton.com).

## 5. Your Personal Information And Your Rights

Keeping your data secure is a priority for us. We utilise appropriate and up-to-date security measures to protect your personal information and prevent unauthorised or unlawful access, as well as to safeguard against accidental loss or damage.

We have implemented procedures and technologies to maintain the security of all personal information from the point of collection to its eventual destruction. These measures include compliance with various security standards, including physical and technological protections, data encryption, patching and software update management, access rights management, network configuration, and monitoring.

We ensure that your personal information is only accessible by those who require it for their specific role. We will only transfer personal information to a third party if they agree to adhere to these procedures and policies, or if they implement adequate security measures themselves.

# Privacy Policy

## 6. Sharing Your Data With Third Parties

In addition to our employees, we also engage third-party providers who may process personal information on our behalf to fulfil our commitments to you. These providers are carefully selected professional contractors (such as mailing or research companies) who assist us in delivering our products and services. They will only collect, use, and disclose your information to the extent necessary to provide those products and services. We have legally binding contracts in place with any providers we use to ensure your data remains secure at all times and is not accessed for any other purpose.

The third parties we work with include:

- Third party consultants, contractors and suppliers.
- Our financial and legal advisors and relevant mortgage advisors.
- Estate agents and estate managing agents.
- Utility suppliers and local authorities.
- Relevant Government agencies to assist you to participate in any Government schemes in which you have indicated you wish to take part.
- The New Home Warranty Provider and similar organisations.
- Suppliers of identity and anti-money-laundering checks.
- Marketing agencies who provide us with marketing services.
- Our analytics providers, including Google Analytics.
- Our followers on our social media accounts if we repost your social media post (with your permission).
- Local authorities, consultants and third parties for the purposes of supporting the public consultation process undertaken for planning purposes in relation to any proposed new development schemes.

If you believe that we have not complied with data protection laws regarding your personal information or if you have any concerns with our processing of your personal information and would like to make a complaint, please raise the matter to [dataprotection@homesbycarlton.com](mailto:dataprotection@homesbycarlton.com).