

Introduction and general terms

At Bloor Homes, we respect your privacy and are committed to protecting all personal data we process. This privacy notice tells you about the information we may collect about you and how we use that information as part of non-sales related engagements.

Wherever you see the words "we", "us", "our" in this Notice, these words refer to Bloor Homes Ltd.

In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data and about the rights you have over your data.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. We collect only that personal data from you which we need to provide you with the services you request, answer any queries you may have raised or otherwise operate our business in the way that you would anticipate.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped as follows:

| Contact Data | includes title, name, address, email address, telephone number and the area you live in. | |
|-----------------------|--|--|
| Other Identifier Data | photographs containing your likeness. | |
| Communications Data | includes emails, notes of personal or phone conversations, etc. | |

When you contact us directly

When you contact us outside of a normal sales related relationship it is expected that there will be personal data contained. This will likely include contact information but may also contain more personal data depending on the nature of the contact.

Bloor homes will use any information provided in good faith to to facilitate any request made by you and keep in touch with you through the resulting process.

We will collect and use your data based on legitimate interest. This will persist until such point that the request has been resolved, after which we will keep and use your data based only for its original purpose and best service your relationship with Bloor Homes on your behalf.

We do not use the information you provide to make any automated decisions that might affect you.

When you buy a Bloor Home

Please see our separate Customer Privacy Notice which is available at our site offices, at the point of purchase and also on request.

When you use our website

Please see our separate Website Terms & Conditions, Privacy Notice and Cookies Policy; all of which can be found on our website.



How we use your personal data

We use your personal data only when legally permitted. The most common uses of your personal data are to respond to queries or advise on pre-purchase related processes; where it is necessary for our contractual obligation (or those of a third party) and your interests and fundamental rights are not unduly impacted; or where we need to comply with a legal or regulatory obligation.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

| Purpose/Activity | Type of data | The lawful basis for processing |
|--|---|--|
| To provide our services: Answer questions or queries: | (a) Contact b) Other identifier (c) Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests |
| To manage our relationship with you, before during and after the sale: | (a) Contact (b) Other identifier (c) Communications | (a) Performance of a contract with you (b) necessary for our legitimate interests (to validate your identity) (c) Necessary for our legitimate interests (to create the best buying experience, to keep our records updated and support you after you move in) |

Note that we may process your personal data for more than one legal ground depending on the specific purpose for which we are using your data.

Sharing your personal data

As part of the pre-purchase related processes, where you are not at the point of becoming a customer, we may have to share your personal data with select third parties to facilitate accurate and timely responses to you. In most cases this will be to undertake further investigation or request assistance to resolve a query, for example:

- solicitors
- estate agents
- maintenance companies
- insurance companies
- mortgage lenders

- professional advisers and consultants
- independent financial advisors
- 'help to buy' or 'homebuy' agents
- regulators (NAHB, ICO, etc.)

• local councils and authorities as prescribed in the Local Government and Finance Act 1992

We share only the minimum amount of personal data to undertake the task at hand and require all third parties to respect the confidentiality and security of your data and to treat it in accordance with the data protection laws.

We do not allow our third-party service providers to use your data for their own purposes and only permit them to process your personal data for specified purposes and by our instructions.



Automated decision making

We do not use the information you provide to make any automated decisions that might affect you.

International transfers

We do not knowingly transfer any personal data outside the European Economic Area (EEA).

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Also, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

If at any point you suspect or become aware of a security incident (i.e. your password is stolen, or you receive suspicious communication from someone holding themselves out to be a Bloor Homes employee or from a dupe website claiming to be affiliated with Bloor Homes), please let us know using the contact information provided below.

Data retention

We only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, or reporting requirements.

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.

Changes to the privacy notice and your duty to inform us of changes

This version of our privacy policy was last updated in May 2023.

It is vital that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Your rights over your information

By law, you can ask us what information we hold about you, request to have access to it, and you can ask us to correct it if it is inaccurate. In those cases where we process your information for contractual reasons, you can ask us to give you a copy of the information.

If you believe we are not using your information lawfully, you can ask us to stop using it for a period. In some circumstances, you may have the right to ask us to erase your personal data.

To submit a request by email, post or telephone, please use the contact information provided below.



Contacting us

We are not required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to the contact details below.

Address: Bloor Homes Head Office

Ashby Road Measham Swadlincote Derbyshire DE12 7JP

Phone: 01530 270100

Email: <u>hq@bloorhomes.com</u>

Your right to complain

If you have a complaint about our use of your personal information, we would prefer you to raise it with us in the first instance to give us the opportunity to put it right, but you can also contact the Information Commissioner's Office as below:

Address: Wycliffe House

Water Lane Wilmslow Cheshire SK9 5AF

Phone: 0303 123 1113

Website: <u>www.ico.org.uk/concerns</u>