

Annington

Buyer Privacy Notice

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Document owner: Data Protection Lead

1. **What is this document and why should you read it?**

The Annington company:

- you have purchased or will purchase a property from;
- that built or developed a property you have purchased, will purchase, occupy and/or have access to;
- that is named on a contract with you; and/or
- you are otherwise interacting with,

is a controller of your personal data (and is referred to in this privacy notice as **"we"**, **"us"**, **"our"**).

This privacy notice explains how and why this Annington company, part of the Annington Group of companies (each such company and all such companies together referred to as **"Annington"**), uses personal data collected about potential, actual and previous buyers of properties owned and/or built or redeveloped by Annington (**"Annington Properties"**) (including potential, actual and previous buyers of properties built or developed by Annington that did not buy properties directly from Annington), potential, actual or previous occupiers of such properties or individuals who have access to such properties (**"you"**, **"your"**).

You should read this notice, so that you know what we are doing with your personal data.

Please note that this privacy notice supplements Annington's website privacy notice (<https://www.annington.co.uk/privacy-policy/>) which also sets out how Annington uses your personal data when you use Annington's website (the **"Website"**). You should read the Website privacy notice in conjunction with this notice.

This notice explains how we use your personal data when you register an interest or request details about an Annington Property, purchase an Annington Property, occupy or access an Annington Property or when you otherwise communicate or engage with us in relation to an Annington Property. Depending on your relationship with us, or Annington more widely, we or Annington may use your personal data for other purposes and one or more other Annington privacy notices may then also apply to such specific uses of your personal data.

Please also read any such other privacy notices from us or Annington.

2. **Annington's data protection responsibilities**

Please refer to section entitled 'Annington's data protection responsibilities' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>

3. **What types of personal data do we collect, and where do we get it from?**

We collect and process different types of personal data about you when you use the Website, register an interest or request information about an Annington Property, purchase an Annington Property, occupy or access an Annington Property or where you otherwise communicate or engage with us. We also obtain some personal data from other sources, and create some personal data ourselves.

It is your responsibility to make sure the personal data you provide to us is complete and accurate and you must help us to keep it accurate and up to date. If you have a current or ongoing relationship with us and any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting dataprotection@annington.co.uk.

The table below sets out the different types of personal information that we collect. The details will be collected directly from you but sometimes may be obtained from other sources, such as from other individuals who may or have purchased an Annington Property with you and/or occupy the property with

you, from CCTV on site, from the Land Registry or from credit agencies/lenders and/or retained estate agents.

Occasionally, we will use your personal data when it has been provided by a person on your behalf, such as your spouse, partner, a relative, or your other representative e.g. your agent, solicitor or other professional adviser (your "**Representative**").

Types of personal data

Prospective, current and previous buyers

- Name and Title
- Date of birth
- Address, Telephone and Email address
- Responses to surveys
- Purchasing budget (if provided) and whether funds are held for the reservation fee/deposit
- Bedroom & furnishing requirements and any other property requirements (if provided)
- Preferred method of contact
- Reasons for moving
- Current housing situation (e.g. if already a homeowner)
- Timescales for moving
- Job title and working location
- Names of potential occupiers
- Any pets
- Viewing availability and details
- Correspondence history, details of queries, complaints and disputes
- Party profile (e.g. sharers, couple etc.)
- Where you heard about us
- Any feedback you provide
- Deposit details (requested, paid and/or returned)
- Ownership start and end dates
- Copy of contracts and agreements
- Your testimonial if you provide one
- Photographs of you
- CCTV images
- Vehicle registration
- Financial situation and history
- Public (electoral register) information
- Information on shared credit, financial situation and history and fraud prevention
- Data relating to any vulnerability (as defined by the Financial Conduct Authority) which you (or occupiers of the property, which may include persons under the age of 18) may have
- If you voluntarily disclose the following types of Sensitive Information (see section 5 below):
 - Racial or Ethnic origin
 - Political opinions
 - Religious or philosophical beliefs
 - Trade union membership
 - Health Data (which may relate to vulnerability or access)
- Your attendance at events arranged by or on behalf of us, and other events which we notify you of ("**Events**")
- Communications we may have with you, whether relating to an Event or not
- Any additional information that you provide to us voluntarily, including (for example) requirements for attendance at Events
- Status as a management company member, director and/or company secretary
- Information relating to the progression of our sale to you including date of mortgage offer and chain details

Prospective, current or previous occupiers/those that have property access

- Name and Title
- Address, Telephone and Email address
- Availability
- Property occupied, responsible tenant and related information about their tenancy
- Your testimonial if you provide one
- Photographs of you
- CCTV images
- Vehicle registration

- Data relating to any vulnerability (as defined by the Financial Conduct Authority) which you (or other occupiers of the property, which may include persons under the age of 18) may have
- If you voluntarily disclose the following types of special category data:
 - Racial or Ethnic origin
 - Political opinions
 - Religious or philosophical beliefs
 - Trade union membership
 - Health Data (which may relate to vulnerability or access)
- Your attendance at events arranged by or on behalf of us, and other events which we notify you of ("**Events**")
- Communications we may have with you, whether relating to an Event or not
- Any additional information that you provide to us voluntarily, including (for example) requirements for attendance at Events
- Meter readings at time of moving in

4. What do we do with your personal data, and why?

We process your personal data for particular purposes in connection with your purchase and/or occupation of or access to one of our Annington Properties and, dependent on such use and your relationship with us, to deal with your enquiry or your communication or other engagement with us, and the management and administration of our business.

We are required by law to always have a "*lawful basis*" (i.e. a permitted reason or justification) for processing your personal data. The table below sets out the purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

Please note that where we have indicated below that our processing of your personal data is either:

- (a) necessary for us to comply with a legal obligation; or
- (b) necessary for us to take steps, at your request, to potentially enter into a contract with you, or to perform it,

and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract or engagement with you.

| | | Lawful basis | | | |
|--------------------------------|---|--|---|---|---|
| | | Your consent | To perform a contract with you | To comply with a legal obligation | For our legitimate interests |
| Communications with you | | | | | |
| a) | Responding to your requests, enquiries and/or customer complaints, including sending you details of properties you have requested | | ✓ | ✓ (where mandatory for us to do so by law) | ✓ (to respond to you in relation to such matters) |
| b) | Confirming and processing property purchases or other orders for goods or services that you may make with us | | ✓ (for property sales to you) | | ✓ (to conclude property sales involving other buyers) |
| c) | Sending you information (including direct marketing) as set out in the section " <i>How do we communicate with you?</i> ", below | ✓ (direct marketing information where we need your consent) | ✓ (keeping you updated on the transaction) | | ✓ (to keep you updated on transactions, orders and with other helpful updates and direct marketing in other cases) |

| | | Lawful basis | | | |
|--|--|--------------|--|-----------------------------------|---|
| | | Your consent | To perform a contract with you | To comply with a legal obligation | For our legitimate interests |
| Background and Identity Check Information | | | | | |
| d) | Performing Know Your Client and anti-money laundering checks in relation to transactions | | | ✓ | ✓ (to ensure compliance with anti-money laundering requirements and good governance) |
| e) | Performing identity checks in relation to certain transactions | | | ✓ | ✓ (to ensure that the identity of our customers is verified) |
| f) | Performing credit checks in relation to transactions | ✓ | | | ✓ (to make sure that those purchasing from us have the necessary funds and commitment to pay, to ensure we are paid) |
| The property | | | | | |
| g) | To find the right property for you | | ✓ (if you contract with us as an individual) | | ✓ (where you represent your employer or organisation, or a buyer who contracts with us) |
| h) | To deal with your requested or agreed property purchase to complete the transaction with you | | ✓ (if you contract with us as an individual) | | ✓ (where you represent your employer or organisation, or a buyer who contracts with us) |
| i) | To deliver goods or services to you or the business you represent, to deal with any complaints or any after sales services | | ✓ (if you contract with us as an individual) | | ✓ (where you represent your employer or organisation, or a buyer who contracts with us) |
| j) | Arranging appointments and organising access to property for maintenance and repair purposes, including obtaining and using occupier details | | ✓ (if you contract with us as an individual) | | ✓ (where the occupier has not purchased the property from us) |
| k) | To carry out checks to identify potential fraudulent transactions, to prevent and detect crime and protect genuine customers and our business from fraud to minimise the risk of false details being used, and abuse of card / other details by fraudsters | | ✓ | | ✓ (to protect our business, other buyers and the public from fraud and crime – this is also in the public interest) |
| l) | To administer your membership and/or status as a | | | | ✓ (to ensure the smooth running of management) |

| | | Lawful basis | | | |
|-----------------------|---|---|---|-----------------------------------|--|
| | | Your consent | To perform a contract with you | To comply with a legal obligation | For our legitimate interests |
| | director/company secretary of a management company and work with you in your capacity as a member/director/ company secretary | | | | companies and our relationship with them and you) |
| All categories | | | | | |
| m) | To host Events | ✓ (where Sensitive Information (see section 5 below) is provided by you voluntarily e.g. dietary or access requirements) | | | ✓ (to host prospective/current tenants/occupiers to discuss property interests) |
| n) | Establishing and enforcing our legal rights and obligations and monitoring to identify and record fraudulent activity | | | ✓ | ✓ (to protect our business, other buyers and the public from fraud and crime – this is also in the public interest and may be needed to deal with legal claims) |
| o) | Complying with requests, orders and instructions from law enforcement agencies, regulators, any court, parties to proceedings or otherwise deal with obligations required by law or regulators and to ensure good governance and compliance | | | ✓ (where binding) | ✓ (where not binding but good governance and in the public interest) |
| p) | For our general record-keeping and relationship management | | ✓ (if you contract with us as an individual) | | ✓ (where you represent your employer or organisation, or a buyer who contracts with us and we need this to run our business properly) |
| q) | Managing the proposed sale, restructuring or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organisation | | | | ✓ (to sell any part of our business) |
| r) | To keep records required by law or to evidence our compliance with laws, including tax laws, | | | ✓ | ✓ (including compliance with related regulatory guidance and best practice) |

| | | Lawful basis | | | |
|----|--|--------------|-------------------------------------|-----------------------------------|--|
| | | Your consent | To perform a contract with you | To comply with a legal obligation | For our legitimate interests |
| | consumer protection laws and data protection laws. | | | | |
| s) | Resolving any complaints from or disputes with you | | ✓ (if with you as an individual) | | ✓ (to try and resolve any complaint or dispute you might raise with us and to deal with legal claims) |
| t) | Personal safety and security and to safeguard the property | | | ✓ | ✓ (CCTV in operation, for personal safety and security purposes) |
| u) | For our marketing purposes | | | ✓ | ✓ (to showcase our properties and/or your experience with us) |
| v) | Monitoring email traffic data and content | | | | ✓ (to monitor and manage access to and from our systems and to relevant records and data, to protect our networks and assets, and to protect personal data of employees, customers/clients and other individuals against unauthorised or unlawful access/use) |

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports.

5. Sensitive Information

5.1 Please see the section entitled 'sensitive information collected through the website' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

5.2 Some of the processing described in the above table will include the processing of 'special categories of personal data' and/or sensitive personal data (together, "**Sensitive Information**" – as set out in the table at **paragraph 3**, above). This refers to sensitive or special categories of personal data which we are required to process with more care, according to applicable laws.

5.3 We will only process Sensitive Information in relation to you:

- (a) in respect of access to property or reasonable adjustments, where this is required by law or with your explicit consent;
- (b) in respect of Events, with your explicit consent;
- (c) in relation to any vulnerability (as defined by the Financial Conduct Authority) which an individual (or occupiers of the property, which may include persons under the age of 18) may have; or
- (d) in relation to right to rent checks, some information you provide (for example, a copy of your passport) may include Sensitive Information, such as information that reveals your race and/or ethnic origin.

6. Who do we share your personal data with, and why?

Sometimes we need to disclose your personal data to other people.

We are part of a group of companies. Therefore, we will need to share your personal data with other companies in the Annington group (for example, for shared services/division of functions) and/or parent company group for key parental decision making and reporting purposes. Where any group companies process your personal data on our behalf (as our processor), we will make sure that steps are taken to protect the confidentiality, security and privacy of your personal data.

From time to time, we may ask third parties or other Annington Group companies to carry out certain business functions for us, such as property management, property maintenance, agency services and IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data. Examples of these third-party service providers include our providers of IT systems software and maintenance, back up, and hosting services.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right (for the purposes set out above). Please see the section entitled 'who do we share your personal data with, and why?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>. In addition, we may also share your personal data with the following third parties:

- (a) to Event organisers in relation to your attendance (or apologies) for an Event;
- (b) utilities companies or other entities who provide utilities services to the relevant property or other public bodies, where required for utilities payment arrangements or confirming change of ownership;
- (c) management companies

7. Where in the world is your personal data transferred to?

Please see the section entitled 'where in the world is your personal data transferred to?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

8. How do we keep your personal data secure?

We will adopt security measures to provide appropriate protection for your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

9. How long do we keep your personal data for?

Please see the section entitled 'how long do we keep your personal data for?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

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, the purposes for which we process your personal data, and any applicable laws or regulations.

We may in the future implement retention guidelines (and include a link to them here) which will set out further details about the period for which we keep records of your personal data. Please check back here from time to time if you would like to know more about retention.

As part of its data security framework, Annington uses immutable back-ups systems to ensure the integrity and availability of backed-up data. Such backups are designed so that once created they cannot be edited, deleted or overwritten in any way until the end of the defined retention period. This helps to protect against data corruption, accidental loss, and other cyber threats. If we have utilised our immutable back-ups, we will endeavour to ensure that data that has been subject to a deletion request is not restored back into our operating systems.

10. How do we communicate with you

Please see the section entitled 'how do we communicate with you' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

11. **What are your rights in relation to your personal data and how can you exercise them?**

Please see the section entitled 'what are your rights in relation to your personal data and how can you exercise them?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

12. **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the purposes for which and/or the way in which it is processed. We encourage you to check this notice on a regular basis.

13. **Where can you find out more?**

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact us in any of the following ways:

By email at: Dataprotection@annington.co.uk

By telephone at: 020 7960 7500

By post at: The Data Protection Lead, Annington, Hays Lane House, 1 Hays Lane, London, SE1 2HB, United Kingdom