

# **Privacy Notice for Customers**

MJ Gleeson plc and its associated companies and undertakings ("Gleeson") is committed to respecting your privacy.

Please read the following notice to understand how your personal information will be collected, stored, and treated by Gleeson. This notice may change from time to time so please check it regularly.

This Gleeson privacy notice applies to all personal information that you or a third party provide to us.

By providing Gleeson with information or using our website you agree to be bound by this notice in respect of the personal information collected about you.

#### **Data Protection**

As a data controller we are committed to protecting and respecting the privacy of our customers, and prospective customers. We take data protection very seriously and comply with all relevant legislation when handling any personal information given or received from you or third parties.

#### This is the personal information we collect

In the course of our interactions with you we may collect some or all of the following information:

- Name
- Address (home and work)
- Telephone contact number/numbers
- Email address
- Date of birth or age
- Signature
- Proof of identity documents, such as passport or photographic driving licence
- Residency status and financial information
- Bank account details, including bank statements
- Other related information to support your occupation of the property and to confirm identity
- Health data relating only to the COVID-19 pandemic\*
- Photographs and video images including closed circuit television

- Information you provide in response to surveys about your home, customer experience or our initiatives
- Information relating the options and extras you chose for your home
- Call recordings

\*where we do collect any health data, we do not currently rely on consent as a basis for processing special category personal information.

# This is how we collect your personal information

- When you contact us in person at one of our Gleeson Homes developments
- When you view our website and submit your information through our web enquiry forms
- When you request further information about our products and services and send your personal information to us through a third party website such as Rightmove, Zoopla or through social media
- When you provide information through MyGleeson®
- When you telephone a Gleeson office
- Through our contact with you during or after the sales process, including contact with our customer care department
- When you provide us with any other information we request
- Via closed circuit television cameras on our development sites and in our sales offices
- To conduct studies and surveys to help improve our products and the services we offer to Gleeson's customers and the communities within which we build.

# This is why we collect your personal information

- To provide services to you both before, during and after the sales process
- To notify you of products and services you may be interested in, such as new property releases or new developments
- To fulfil our contractual obligations to you
- To satisfy our legal obligations
- To take and administer payments
- To maintain security and crime prevention
- To ensure the health and safety of our customers, employees, contractors and supply chain
- To help us achieve our strategies and initiatives
- With your consent, or if we have a legitimate interest in doing so, contacting you for marketing and promotional purposes (including inviting you to enter competitions and prize draws).

#### This is how we use your personal information

- To inform you of relevant Gleeson products and services
- To ensure that content from our website is presented in the most effective manner for you and for your computer/device

- To progress your enquiry or purchase of a Gleeson home
- To provide customer care services including ensuring that any defects in your home are properly remedied
- To monitor customer satisfaction and improve our services to you or other customers
- To help assist you with any government schemes that you participate in
- For analytical research
- To help us set our strategies and initiatives, and monitor progress against them
- To administer any lease or shared equity arrangements
- To administer payments made by you to Gleeson, or vice versa
- To provide our employees, contractors or supply chain with information that will ensure their health and safety is safeguarded.
- For security
- To support law enforcement bodies in the prevention, detection and prosecution of crime

#### Monitoring of communications

We may monitor, record, store and use any telephone, email or other communication with you in order to check any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.

#### We use Cookies

Please <u>click here</u> to view the Gleeson Cookie Policy.

#### Who we share your personal information with

Should you consider purchasing a property from us we may share your information with selected third parties that work on our behalf, to provide you with a product or service that is relevant to your enquiry or your reservation. These companies are required to ensure appropriate security measures are in place and maintain the confidentiality of your information. These third parties can include, but are not limited to mortgage or finance providers, other legal and professional advisors. This information will only be used by us in relation to your enquiry or by third parties for the provision of a related product or service. The information will not be used for any other purpose.

If you enter into a contract to purchase a Gleeson home, we will also share relevant information with conveyancing solicitors, our subcontractors and supply chain, utility providers including Gas, Electric, Water and telecommunications, the National House Building Council (NHBC), online survey providers, estate and management agents and to Local Authorities.

We may share your email address with a third party data processor such as <u>www.mailchimp.com</u> for the purpose of emailer distribution. If at any time you wish to stop receiving these emails you can unsubscribe via the link in the footer of the email or contact us at the address noted at the end of this notice.

We may share your personal data within the Gleeson group of companies.

Finally, under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations, for instance, when responding to subject access requests, proceedings of a court of law or similar legal process, to protect against fraud, and to otherwise cooperate with law enforcement or regulatory authorities.

## The legal basis we rely on to process your personal information

Under Data Protection legislation we are allowed to process your personal information if we meet certain conditions. The reason for processing that we rely on are as follows:

## 1. In the performance of a contract

Where you transact to buy a Gleeson home, we will use your personal information so that we can fulfil our contractual obligations to you, and any relevant third party.

#### 2. In the performance of our legal obligations

Where we are required to do so by law, we will disclose your personal information, for example, where your personal information is requested by a law enforcement agency or where we believe it is necessary to disclose your information to investigate, prevent or take action regarding illegal activities, suspected fraud or situations involving potential threats to the physical safety of any member of our employment, or subcontractors or supply chain.

## 3. Where we have a legitimate interest to in doing so

Where we consider that the use of your personal information is necessary to achieve a legitimate interest of Gleeson, and we've balanced that against your interests, rights and freedoms, then the law permits us to handle your personal information. Many of the reasons that we collect your personal information will fall under this category.

#### 4. With your consent

Generally, we do not rely on consent as a legal basis for processing your personal information although we will get your consent before sending third party direct marketing communications to you via email or text message., or as otherwise set out in this privacy notice. You have the right to withdraw consent to marketing at any time by contacting us.

#### How long we will hold your personal information

Data processed for enquiry purposes will be held for the length of time we are actively selling new homes on the development you have requested information about and other Gleeson developments in the same area or until you ask us to remove it.

If you purchase a home from us we may continue to process your personal information for 15 years or such shorter period as the law may provide or we may select. This comes into effect from the actual completion date of your purchase. If your purchase is assisted by a shared equity scheme we will continue to process your personal information up to 12 years after monies owed to Gleeson have been paid and the contract is completed. If your purchase was under a leasehold arrangement we will continue to process your personal information in respect of the leasing arrangement for the earlier of up to 12 years from either

notification that you have sold your Gleeson home or when we no longer have any interest in the property.

## Storage of your personal Information

We will store digital or hard copy data on our premises or it may be transferred to a secure third party facility for storage. We will keep your information secure by taking appropriate technical and organisational measures.

The information supplied to us via the enquiry forms on our website, or via enquiry forms on third party sites such as Rightmove, Facebook or Instagram is held on our computers and servers hosted by third parties.

Your personal information may be processed both within the European Economic Area ("EEA") and outside the EEA. If we process your personal information at a destination outside the EEA we confirm that we have appropriate contracts in place with any third parties based outside the EEA to ensure your data is processed in accordance with applicable Data Protection legislation.

#### Links from our website

If you reach our website via an external link or click a link to an external site from our website our Privacy Notice will not apply. We are not responsible for the accuracy of third party websites.

# Your Rights

Under Data Protection legislation you have a number of rights. These include:

- The right to know how we use and handle your personal information
- The right to access the personal information that we are handling and to information contained within this privacy notice
- The right to anonymise your personal information, or for us to correct any mistakes in the information we hold
- The right at any time to object to direct marketing or for you to be removed from our databases or mailing lists
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

If you have any questions or complaints relating to how we use your personal information, or if you wish to exercise any of your rights regarding your personal information, please write to us at the following address and enclose appropriate identification in order that we may confirm your identity:

Legal Department MJ Gleeson PLC 6 Europa Court Sheffield Business Park Sheffield S9 1XE

## Our company registration and data processing registration details

Gleeson Homes and Gleeson Strategic Land operate as divisions of MJ Gleeson plc from the following subsidiary companies:

Gleeson company	Company registered number	Data protection registered number
MJ Gleeson plc	9268016	ZA113503
Gleeson Developments Limited	848808	Z7561821
Gleeson Regeneration Limited	3920096	Z7561849
Gleeson Developments (North East) Limited	3867699	ZA181177
Gleeson Land Limited	5181745	ZA249157
Gleeson Land (Fleet) Limited	5742750	ZA368520

The registered address of all Gleeson companies is:

6 Europa Court Sheffield Business Park Sheffield S9 1XE

#### Information Commissioner's Office

You may contact the Information Commissioner's office to log a complaint either via their website: ico.org.uk or by calling 0303 123 1113.

#### **Changes to this Privacy Notice**

We regularly review our privacy notice and reserve the right to make changes at any time without notice.

This Notice was last updated on 29th April 2022.