

Privacy Notice

WHO ARE WE?

We are Stirlin Group Limited, which, for the purposes of this policy, includes Stirlin Developments Limited and Lodge Lane Developments Limited, trading as Homes by Stirlin.

If you have any questions about this Policy, or about how we look after your data generally, please contact us on **01522 682752** or email **info@stirlin.com**.

INTRODUCTION

Both Stirlin Developments Limited and Lodge Lane Developments Limited ('we' or 'us' etc), are 'data controllers'. This means that, under the Data Protection Act 2018 (the Act) and the EU General Data Protection Regulation (GDPR), we may control and process your personal data.

We take privacy very seriously. We are committed to keeping your data secure and processing it fairly and lawfully. We ask that you read this policy very carefully because it contains important information about how we process your personal data.

PERSONAL DATA WE MAY COLLECT ABOUT YOU

We collect personal data directly from you via our websites or when we meet with you at our sales sites or offices and via other communications between us when you make enquiries with, or purchase a property or unit from us.

This information includes:

- Your name, address and contact details (usually email address(es), postal address and phone number(s))
- Your communication preferences
- The type and price of any property or unit you are looking for
- Details about the home you currently live in and its sale status and any other property relevant to your enquiry
- records of written and verbal communications between us either electronic or written
- why and when you want to move
- some demographic information about you and members of your household including age range, household type and profession
- CCTV images if you attend one of our sites where CCTV is operational
- Information about professionals advising you, such as your solicitor, mortgage broker and lender

In addition, we may monitor your use of our website through the use of cookies and similar tracking devices. For example, we may monitor how many times you visit, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider. This information helps us to build a profile of our users. Some (but not all) of this data will be aggregated or statistical, which means that we will not be able to identify you individually. Please see further the section on 'Use of cookies' below.

If you start the process of wanting to purchase a property or unit from us, we may also collect the following information from you:

- Details of any mortgage or financial assistance
- Information required to support any equity loan scheme, such as Help to Buy
- Any extras or upgrade preferences

- Financial or payment information for the purposes of taking payment for any extras or upgrades (although we do not store your payment details)
- Details of your utility providers and meter readings, if you purchase one of our properties

PERSONAL DATA WE MAY COLLECT FROM THIRD PARTIES

We may also receive information about you from other sources, such as:

- Your professional advisors, including mortgage brokers, solicitors, estate agents and financial lenders
- Our own solicitors and professional advisors
- Information already in the public domain
- Other companies within our group and our strategic partner Loge Lane Developments Limited
- Third party providers such as Rightmove and Zoopla
- Our own external estate or sales agents

HOW WE USE YOUR PERSONAL DATA

We are required to have a legal basis for processing your personal information. These are most commonly:

- to perform or take steps to enter into a contract with you
- to comply with a legal obligation
- where we have your explicit consent, freely given
- where it is necessary for our legitimate interests and these are not overridden by your rights and interests

When you make an enquiry, we will use the personal information for the following reasons:

- follow up your enquiry and provide further information you have requested about any properties or units you have showed an interest in
- determine which of our properties or units may suit your needs, based on the information you have provided
- to make you aware of new sales releases, offers, events, promotions and other marketing information subject to your consent
- to tailor our products, understand how you heard about us, improve our website and adapt our marketing channels

Where you reserved or purchased one of our properties or units, we may also use your personal information to:

- assist you in the journey of tailoring and purchasing a home from us
- provide after-sales support in performance of our contract with you
- obtain customer feedback on your home and the purchasing process based on our legitimate interests
- inform you about further developments and news, with your consent

We will also use your personal information to comply with our legal obligations, for example to:

- establish your identity
- comply with money laundering and fraud legislation
- prove succession of title

We may use your information to tailor our marketing activity based on your interests and preferences. We will not use your information to carry out any automated profiling that could have a legal effect on you.

SHARING YOUR PERSONAL INFORMATION

We may share your personal information with:

- Third parties who provide services to us, such as our solicitors and professional advisors, contractors, suppliers and fitters
- Providers of shared equity loans, such as Help to Buy
- Your professional advisors, such as solicitors, estate agents, IFA, mortgage brokers and financial lenders, subject to your consent
- We will pass your details to our warranty provider, such as Premier Guarantee or NHBC, so they can issue a warranty certificate and to utility companies so they may provide you with their services
- We will take meter readings on the day you complete the purchase and pass these to the relevant utility company
- Management companies relating to sites upon which you live

MARKETING AND OPTING OUT

We will not contact you for the purposes of direct marketing unless you have asked us to do so. However, if you have asked us to do so and later you change your mind, you can opt-out at any time with no hassle. To do this, just let us know. See further 'Your rights' below for details about how to contact us.

KEEPING YOUR DATA SECURE

We will use technical and organisational measures to safeguard your personal data, for example:

- Access to our systems is controlled by password and username which are unique to the user;
- We store your electronic personal data on secure servers;
- We store your paper records in locked storage rooms;
- We train our staff in good records management;
- Payment details are encrypted

Non-sensitive details (your contact details and preferences for example) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

TRANSFERRING YOUR INFORMATION OUTSIDE OF EUROPE

We may store your data temporarily on our cloud service operated by Google. We have taken appropriate steps to satisfy ourselves that your data will be secure during this process; we have a contractual relationship with Google that underpins this. As part of that security, Google may store your data in one or more of its international data centres, meaning that your data may be stored temporarily outside of the European Economic Area. If you have any concerns about this, please contact us using the details below.

INFORMATION ABOUT OTHER INDIVIDUALS

If you give us information on behalf of someone else, such as members of your household, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- Give consent on his/her behalf to the processing of his or her personal data
- Receive on his/her behalf any data protection notices

HOW LONG DO WE KEEP YOUR DATA FOR?

As a general rule, we will not keep your data for any longer than is necessary to complete tasks or provide you with services. We have a separate policy setting out retention periods for specific types of data. You can ask to see this policy by writing to us, using the contact details under the "Your Rights" section below. You also have the right to ask us to delete your data (sometimes known as 'the right to be forgotten'.)

COOKIES

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. If you use our website, we may use cookies to:

- Track your use of the site;
- Recognise you whenever you visit this website (this speeds up your access to the site as you do not have to log on each time);
- Obtain information about your preferences, online movements and use of the internet;
- Carry out research and statistical analysis to help improve our content, products and services and to help us better understand our visitor/customer requirements and interests
- Target our marketing and advertising campaigns more effectively
- Make your online experience more efficient and enjoyable

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to the use of cookies. This includes cookies that are essential in order to enable you to move around the site and use its features and cookies that are not essential but gather information about your use of the site

YOUR RIGHTS

You have various rights under the Act and the GDPR, including the following rights:

- Right to object: If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example, providing you with services), or consent to market to you, you may withdraw your consent at any time.
- Data Subject Access Requests (DSAR): Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:
 - we may ask you to verify your identity, or ask for more information about your request; and
 - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
- Right to erasure: In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.
- Right of data portability: If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority, details of which can be found below.

To exercise any of your rights concerning your information, please send an email to the following address:

info@stirlin.com

Or write to us at the following postal address:

Stirlin Developments Ltd
11 Sadler Court
Lincoln
LN6 3RG

We may ask you to provide us with proof of your identity. Please do not be offended; this may occur even if we know you. It is a requirement of the GDPR in some cases.

REVIEW

This Policy was last reviewed on **23.08.2018**

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version which will apply each time you access our website.

THE INFORMATION COMMISSIONER'S OFFICE

More information about privacy laws can be found at www.ico.org.uk

Details of your local supervisory authority: The Information Commissioner's Office. You can contact them in the following ways:

Phone: 0303 123 1113

Email: casework@ico.org.uk

Live chat, via the ICO website

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF