

TurnbullHomes

Privacy Statement

Purpose of this privacy statement

Turnbull Homes respects your privacy and is committed to protecting your personal data.

This privacy statement sets out how Turnbull Homes collects and processes your personal data, including but not limited to your use of our websites regardless of where you visit them from (including any data you may provide through our websites when you sign up to our newsletters or make an email enquiry) and it tells you about your privacy rights and how the law protects you.

It is important that you read this privacy statement together with any other privacy statement or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy statement supplements the other notices and is not intended to override them.

Controller

This privacy statement is issued on behalf of Turnbull Holdings Limited ("Turnbull Homes"), and of all associated, subsidiary, holding, related or connected companies, so when we mention Turnbull Homes, "we", "us" or "our" in this privacy statement, we are referring to the relevant company or companies in Turnbull Holdings responsible for processing your data, acting as joint controllers or processors (as the case may be).

Turnbull Homes is not required (nor are its constituent companies required) to appoint a data protection officer but if you have any questions about this privacy statement, including any requests to exercise your legal rights, please contact our Data Privacy Team using the details set out below.

Contact details

Data Privacy Team – Turnbull Homes
Turnbull House
226 Mulgrave Road
Cheam
Surrey
SM2 6JT

Email address: enquiries@turnbullgroup.com

Telephone number: 020 8642 0513

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Your duty to inform us of changes

It is important 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.

Third-party links

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our websites, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes postal/correspondence addresses and address history, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details; salary, income and employment details including information from credit reference or fraud prevention agencies, electoral roll, court records of debt judgments and bankruptcies and other publicly available sources.
- **Transaction Data** includes details about payments to and from you and other details of products and/or services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites.
- **Profile Data** includes purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our websites, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose.

Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly

identify you, we treat the combined data as personal data which will be used in accordance with this privacy statement.

Unless we are required to do so pursuant to a statutory obligation, such as the collection and sharing of data on social housing lettings and sales with the Ministry for Housing, Communities and Local Government via CORE (Continuous Recording of social housing lettings and sales) mentioned later in this statement, we do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), nor any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services (including an application to let or purchase one of our residential or commercial properties);
- visit any of our offices, properties or developments (including on-site sales offices).
- subscribe to our publications or marketing channels;
- marketing information to be sent to you;
- complete a reservation form in connection with our developments.
- complete forms in relation to new-build warranty/guarantee schemes.
- enter into any transaction with us, whether it's in person or any other way
- make a request for a snagging item to be remedied in connection with a new-build property (via one of our customer care teams), you make a warranty claim under a new-build warranty/guarantee scheme, or make a maintenance request in relation to a managed residential and/or commercial property.
- access information about our developments and/or new homes via a third-party provider, such as an estate agent or an online property selling/advertising platform.
- enter a competition, promotion or survey; or
- give us some feedback.

- Automated technologies or interactions. As you interact with our websites, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources including:

- Payment service providers and our bank(s);
- Credit reference agencies;
- Fraud prevention agencies;
- Estate agents or online property selling/advertising platforms.

- Technical data from the following parties:

- Analytics providers;
- Contact, financial and transaction data from providers of technical, payment and delivery services.
- Identity and contact data from data brokers or aggregators.
- Identity and contact data from publicly available sources.
- Advertising networks; and
- search information providers.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into, or have entered into, with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To decide whether to enter into a contract with you	(a) Identity (b) Contact	(a) Necessary to protect our legitimate interests
To register you as a new customer	(a) Identity (b) Contact	(a) Performance of a contract with you
Administration purposes (a) Managing payments, fees and charges; (b) Collection and recovery of money owed to us, including the tracing of your whereabouts.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to ensure the payment and recovery of debts due to us)
Management of our relationship with you which will include: (a) Managing payments, fees and charges; (b) Collection and recovery of money owed to us, including the tracing of your whereabouts. (c) Notifying you about changes to our terms or privacy policy (d) Asking you to leave a review or take a survey (e) carrying out works to remedy snagging items concerning a new-build property (via one of our customer care teams), a claim under a new-build warranty/guarantee scheme, or the making a maintenance request in relation to a managed residential and/or commercial property.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile (f) Marketing and communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to recover debts or other monies due to us and to study how customers use our products/services)

<p>Managing risks relating to our business(es), including credit risk, fraud risk and operational risk</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile 	<p>(a) Necessary for our legitimate interests (assessing your creditworthiness and making affordability decisions, including where you are a prospective tenant or guarantor for a short-term residential letting or commercial letting and for the development of risk management policies, models and procedures used both in the management of our relationship with you and within our business(es) generally).</p>
<p>Enable you to partake in a prize draw, competition or complete a survey</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
<p>Administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
<p>Deliver relevant content and marketing material to you and measure or understand the effectiveness of the marketing material we provide to you, including If you have expressed an interest in a specific property and/or development.</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and communications (f) Technical 	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>Use data analytics to improve our websites, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> (a) Technical (b) Usage 	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our websites updated</p>

		and relevant, to develop our business and to inform our marketing strategy)
Make suggestions and recommendations to you about products or services that may be of interest to you, including the provision of information concerning a specific property and/or development, type of property and/or development or similar properties and/or developments to those in which you have expressed an interest.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us in connection with our properties or developments, where you have previously purchased or let a property from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will obtain your express opt-in consent before we share your personal data with any company outside the group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table above:

The entities forming part of the Turnbull Homes

External Third Parties; and

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy statement.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

Owing to the global nature of the internet and cloud-based infrastructure, your personal data may be transferred outside the UK and the European Economic Area. Whilst some countries have adequate protections for personal data under the laws applicable in those countries, in other countries steps will be necessary to ensure appropriate safeguards are in place. We use a number of cloud-based applications and support services provided by third-party providers who (and whose servers) are based outside the EEA. We take appropriate steps to ensure that any such third parties provide an adequate level of protection in relation to any information you provide.

By providing your personal data to us in accordance with this policy, you consent to any such transfers of any information outside of the 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. In addition, 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.

You acknowledge that the transmission of information (including your personal data) to us via the internet is not completely secure. Although we will do our best to protect your Information as set out above, we cannot completely guarantee the security of information (including your personal data) transmitted to us via our websites or by e-mail.

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying 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.

We will retain information as follows;

1. If you enter into a contract with us to purchase a freehold property, we will hold your information for a maximum of 12 years from the date of completion of that purchase.
2. If you enter into a lease or licence concerning the occupation of residential or commercial property, we will hold your information until the earlier of, the date that lease or licence expires or 12 years from the date that we dispose of our interest in the relevant property.
3. In the event that you provide us with personal information so that we can fulfil any anti-money laundering obligations or to comply with other statutory obligations, we will retain such information for a period of 5 years or, if longer, the minimum period for which we are legally obliged to retain the same.
4. If you request information regarding any of our properties and/or developments or types of property and/or developments that we may build or manage - whether we receive such contact directly from you or via a third party - we will retain your personal information until the earlier of you making a specific request for the erasure of your details or a maximum period of 2 years from the date that you last made contact with us - directly or via a third-party - in relation to any of our properties and/or developments.
5. In all other cases, we will retain your personal data as long as is necessary to deal with your enquiries, for as long as you might legally bring claims against us or to comply with any legal and/or regulatory requirements.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

Making a request to access to access your personal data

Article 15 of the General Data Protection Regulation ((EU) 2016/679) (GDPR) grants you the right to access your personal data held by us, including the right to obtain confirmation that we process your personal data, receive certain information about the processing of your personal data and obtain a copy of the personal data we process.

Requests should be submitted electronically by e-mail to enquiries@turnbullgroup.co.uk

Or alternatively may be sent to:

Data Privacy Team – Turnbull Homes
Turnbull House
226 Mulgrave Road
Cheam
Surrey
SM2 6JT

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated May 2020.