

# Data Protection Commitment (Privacy Statement)

## Introduction

Peter David Homes and its subsidiaries recognises its duty to protect the Personal information of past, present and future customers, current, past and prospective employees and others with whom we communicate.

This statement sets out how we will use your data. You can contact one of our Directors (contact details can be found on our website) if you have any questions.

## Personal Data

Your personal data is data which by itself, or with other data available to us, can be used to identify you.

Our data protection commitment is set out below and tells you how we use your data that you provide to us or that we collect about you, including when you use our website, when you visit our sales offices, when you reserve or buy a new home from us and when you ask us for information. It applies to all purchases, those who express an interest in purchasing any of our new homes and those who contact us or ask us for information about any of our developments.

The trust of those we hold data about is important to us and we will always be careful to use that data as they would reasonably expect and in line with Data Protection Principles.

## The Types of Data We Collect and Use

In order to operate effectively and efficiently Peter David Homes collects and uses information about the people with whom we work. This includes customers and employees. Some of this data will be personal data. The personal data we use may include: name, address, date of birth, occupation, email address, home and mobile telephone numbers, employment details and contact details.

## Providing your data

We will tell you if providing some personal data is optional, including asking for your consent to process it. In some cases, you will be required to provide your personal data to assist us in the processing of your house purchase and/ or the provision of after sales care.

We may receive information about you directly when you submit information to us through our website, for example by filling in forms or indicating you would like to receive further information. We may also collect information about your computer, or other electronic device and browsing actions by the use of cookies when you visit our website. Cookies are small pieces of information that are sent by a website to your web browser and remain on your computer until they are deleted. They help us improve our site and to deliver a better and more personalised service.

## 16 and Under

We do not wish to collect any personal information from children without their parents' consent. If you are under 16, please obtain the consent of your parents or guardian before supplying any information.

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**The legal basis on which we use your personal data. As necessary:**

- 1. To perform our contract with you** e.g. in the sale of one of our properties
- 2. For our own legitimate interests** e.g. for good governance, accounting and auditing of our business operations
- 3. To comply with a legal obligation**, e.g. when you exercise your rights under data protection law (subject access requests), for defence of legal rights and if an employee to provide necessary information to the Inland Revenue or Pension Administrator.
- 4. Based on your consent.** e.g. when you request us to disclose your information to a third party such as a utility company on your behalf, to send you marketing information and generally to keep in touch to ensure we are delivering an excellent customer experience.

Peter David Homes understands that it is the custodian of personal information and the importance of handling personal information securely, appropriately and in compliance with the law.

## Sharing your personal data

Subject to Data Protection Law, we may share your personal data:

- Across our group of companies;
- With sub-contractors and other organisations who help us provide our products and services, but only with your consent;
- Our legal and other professional advisors;
- Government bodies and agencies in the UK
- Courts to comply with legal requirements and the administration of justice
- In an emergency to protect your vital interests
- To protect the security or integrity of our business operations
- Anyone else where we have your consent or where it is required by law

Your data will not be passed outside of the UK. When data is shared with a third party, contractual terms will set out their obligations with regards to Data Protection.

## Your Contact and Marketing Preferences

You may have bought one of our homes and if this is the case, we would like to stay in contact with you. We feel we have a legitimate interest to ensure you remain delighted with your new home and also an obligation related to your new home guarantee.

If you have previously contacted us to enquire about one of our new homes, then we would like to keep your personal data for marketing purposes with your consent.

## Automated Decision Making and Processing

We do not make any decisions based on automated decision making and processing.

## Retention Periods

The following data is used to determine data retention periods for your personal data:

- Retention to service a contract. We will retain your personal data for as long as your guarantee is valid;

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- Retention for marketing purposes. We will retain your personal data for as long as you give your consent
- Retention in case of claims. We will retain your personal data for as long as you might legally bring claims against us
- Retention of employee data. We will retain your personal data for the duration you work for us, and six years following. Unsuccessful applicant information will be held for a period of six months.

## Your rights under Data Protection Law

You have a right to:

- be informed about our processing of your personal data.
- have your personal data corrected if inaccurate and to have incomplete data completed
- object to processing of your personal data
- restrict processing of your personal data
- be forgotten
- request access to your personal data and how we process it
- move, copy or transfer your personal data

You also have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law: [ico.org.uk](http://ico.org.uk)

## Data anonymisation and aggregation

Your personal data may be converted into statistical or aggregated data which can't be used to identify you, then used to produce internal reports. This data may be shared and used in all the ways described above.

## Compliance

The Directors are responsible for ensuring that our Data Protection Policy is complied with and that everyone managing and handling personal information understands that they are responsible for following good practice in this regard.

Mike Holliday (Director) 18.05.2018

Glen Eaton (Director) 18.05.2018