# **Privacy Notice**

# Who we are

We are Joynes House Development Ltd, an SPV (single purpose vehicle) set up to develop the building known as Joynes House in Gravesend, Kent, UK. This company may process certain personal data about you, depending on the scope of your specific relationship with us. This processing of personal data is regulated under the General Data Protection Regulation (2016/679) (the GDPR) and the e-Privacy Directive (2002/58/EC), which both apply across the European Union (including the United Kingdom) (together referred to as the Data Protection Laws). We are responsible as 'controller' of your personal data for the purposes of those laws.

# What does this Privacy Notice cover?

This Privacy Notice applies to the following circumstances:

- personal data processed when we gather your personal details as a potential buyer or renter of a flat
- personal data processed to service our potential and existing buyers or tenants.

#### Data protection principles

We will comply with the principles set out in the GDPR, which states that the personal data we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date:
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

Personal data means any information about an individual from which that person can be identified. It does not include data where your identity has been removed, such as anonymous data.

### What personal data do we collect?

We collect the following personal data that you provide to us when you complete our reservation agreement to buy or rent a flat:

- name;
- address:
- telephone numbers;
- email address; and
- signature.

We may receive personal data about you from other sources, where applicable. This information includes:

- reservation fee amount
- whether you have a mortgage in place or agreed in principle
- contact details of your mortgage broker
- contact details of your solicitor.

We will add this information to the personal data we hold about you for the following purposes:

- comply with our legal obligations; and
- to improve and personalise our service.

# How do we use personal data?

We collect personal data about our clients to keep a record of who has made a reservation for a new flat to buy or rent.

# Who your personal data may be shared with?

We may share your personal information with other group companies, affiliates and other third parties to help us process your personal information for the purposes set out in this Privacy Notice. This may include: contractors, sub-contractors, business partners, introducers, suppliers and/or service providers that help us perform our business functions; law enforcement agencies in connection with any investigation to help prevent unlawful activity; legal representatives and consultants in situations where expert advice and legal opinions are required; and/or processors that maintain our IT systems.

Your personal data is never sold and any personal data that is shared is in line with the Data Protection Laws.

### Reasons we can collect and use personal data

We collect and use your personal data to provide you with a service or product that you have requested, or where necessary, to comply with a legal obligation.

# How long your personal data will be kept

We will keep your personal data for as long as required to allow the sale of a property to complete, or for one year after the end of a tenancy. This allows Joynes House Development Ltd to perform the activities listed in this Privacy Notice. We will maintain your personal data through-out the lifecycle of the contract we have with you. We may need to keep your data for a longer period where we need to retain personal data to comply with legal or regulatory requirements, such as to help us respond to complaints or preventing fraud and financial crime. If we are not required to retain the personal data, we will destroy, delete or anonymise it at the point it is no longer required.

# Keeping your personal data secure

We store your personal data in a secure environment. We have appropriate security measures in place to prevent personal data from being lost, accessed or used in an unauthorised way, including encryption and other forms of security. We limit access to your personal data to those who have a genuine business need to know it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

#### Transfers of your personal data outside of the United Kingdom

Your personal data may be transferred to and stored in locations outside of the UK, such as the European Economic Area. We may need to transfer your data in this way to carry out our contractual obligations to you, to fulfil a legal obligation and/or for our legitimate interests. In such instances, we will only share the personal data with those who have the right to see the personal data.

# What rights do you have?

We would like to make sure you are fully aware of all your data protection rights.

The right to access – You have the right to request us for copies of your personal data and how we process the data.

The right to rectification – You have the right to request that we correct any personal data you believe is inaccurate. You also have the right to request we complete personal data you believe is incomplete.

The right to erasure – You have the right to request that we erase your personal data, under certain conditions. If you enforce this right at the same time as you object to the processing we will have to maintain basic identification data to ensure we do not contact you again.

The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to our processing of your personal data, this means if you do not want to be contacted for the purposes set out in this notice then we will stop processing your data.

The right to data portability – You have the right to request that we transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you.

# **Changes to this Privacy Notice**

This Privacy Notice was published on 4 March 2022. The last update was on 4 March 2022.

We may update or amend this Privacy Notice from time to time. You can check this Privacy Notice to ensure you are aware of the most recent version that will apply each time you access www.lanningkuzdenyi.com.

# **Contacting Us**

If you have any questions about this Privacy Notice or the personal data we hold about you, please contact us by:

Email - <u>shelton@lanningkuzdenyi.com</u>

#### **Complaints**

If you have any complaints about this Privacy Notice or the personal data we hold about you, please contact us by reaching out to the above contact information.

If you are unsatisfied by our response you can contact the Information Commissioners Office (ICO) by contacting:

Contact number: 0303 123 1113

Website: <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a>