

WATKIN JONES GROUP

PRIVACY POLICY

At Watkin Jones plc we are committed to safeguarding and preserving the privacy of our visitors.

This privacy policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. It is important that you read this policy in full to understand what information we hold about you, how we may use it and what rights you have in relation to your data.

By giving us your personal information, directly or through third parties, and using any products or services that we provide, you are accepting and consenting to our processing of your personal information in accordance with the practices described in this policy.

We may need to update this policy to reflect any changes to our business from time to time. Please check this policy regularly to ensure you are familiar with its terms.

Who are we

We are Watkin Jones plc, a public limited company incorporated in England and Wales with company number 09791105. Our registered address is Llandygai Industrial Estate, Bangor, Gwynedd, LL57 4YH.

In this policy we refer to ourselves as "we", "us", "our" and "Watkin Jones".

Watkin Jones is a "data controller". This means that we are responsible for deciding how we hold and use personal information we have collected from you.

If you have any questions, or want more details about how we use your personal information, you can contact our Data Protection Officer as follows:

The Data Protection Officer

Watkin Jones plc
55 Ffordd William Morgan
St Asaph Business Park
St Asaph
Denbighshire
LL17 0JG

compliance@watkinjones.com

What personal information we may hold about you

We may collect the following personal information from you:

- your name
- your title
- your address
- your contact telephone number(s)
- your contact email address(es)
- any personal information that you disclose to us in letters, requests for information, emails and/or telephone conversations between us.
- If you are applying as a tenant to book student or build to rent accommodation that is managed by the Fresh Property Group ("FPG") we may collect such financial information as is necessary from you to support your application for tenancy, including details of your guarantor. FPG has its own Privacy Policy to which you should refer if you are contacting us via the FPG website.
- If you are a sub-contractor who works for us, your bank account and national insurance details.
- Your next of kin and emergency contact details if you are a sub-contractor or visitor to one of our construction sites.
- If you are applying for an employment opportunity with us, such information as you may disclose relating to your qualifications, career record and relevant experience, as well as any other personal information you consider to be relevant.

As well as personal information (such as your name, address, telephone number) we may collect sensitive personal information (also known as special categories of data), about your health, such as any disabilities.

We use this data to ensure that our products and services are products are suitable for your needs and are delivered appropriately, or to enable us to pay you if you are a sub-contractor working with us or to consider you for employment opportunities that we may have if you have applied for a position with us. If you are a sub-contractor or visitor to one of our construction sites, the information we collect will enable us to act in your and our interests in the event of a health and safety incident. We will apply additional security and confidentiality measures when processing your sensitive personal information.

We will ask for your specific informed consent at the time of collecting sensitive data. Where you provide consent for us to process sensitive personal information, you have the right to withdraw this consent at any time.

We may collect information from you in the following ways:

Information provided by you

- When you use our website to request brochures or for us to contact you by telephone, post and/or email about our products, developments and offers.
- When you talk to us on the phone or face to face when you visit one of our show homes and request brochures or for us to contact you by telephone, post and/or email about our products, developments and offers.

- When you contact us via the Fresh Property Group ("FPG") website to register your interest in or to book student or build to rent accommodation that FPG manages. FPG has its own Privacy Policy to which you should refer if you are contacting us via the FPG website.
- When you fill in one of our forms.
- When you contact us by email or other electronic means or by letter.
- When you are engaged as a sub-contractor or are required to complete an induction form when you work on or visit one of our construction sites.
- If you apply directly for positions advertised or make enquiries about opportunities that might be available with us
- If you take part in any competitions or promotions.

Information we collect

- From the following third parties that refer your personal information to us so that we can send you information about our products, developments and offers, or so that we can contact you by telephone, post and/or email about our products, developments and offers:
 - "online property portals" such as Zoopla and Rightmove.
 - estate agents.
 - mortgage brokers.
 - government purchase assistance scheme providers, such as Homes England or Help to Buy - Wales
 - other property companies including registered providers of social housing
- From agencies that refer your personal information to us so that we may:
 - consider you for opportunities with us.
 - engage you to work as a sub-contractor on one of our construction sites.

If you choose not to give personal information

If you choose not to give us your personal information, it may mean that we cannot provide our products or services to you or employ you to work for us.

We will only collect the personal information that we need to be able to provide a service to you or to enable you to work for us.

When we ask you for information, we will make it clear why we need it. Any data collection that is optional will be made clear at the point of collection.

If you provide any personal information relating to another person, normally a joint buyer or someone who is living with you or someone who will act as a guarantor, we assume that you do so with their full knowledge and consent.

Our purpose for collecting and processing your personal data

Data Protection law says that we can use your personal information only if we have a lawful purpose for doing so. This means that we can only process your personal data if we have one (or more) of these reasons:

- To fulfil a contract we have with you, or
- To comply with a legal obligation, or
- When it is in our legitimate interest, or
- When you consent to it, or
- To protect your vital interests e.g. in cases of life or death, or
- When it is in the public interest e.g. it's necessary to deliver justice.

A legitimate interest is when we have a business or commercial reason to use your information.

However, our use of your personal data must not have a negative or unfair impact on you.

Here is a list of all the ways that we may use your personal information, and which of the lawful reasons we rely on to do so.

Purpose

Lawful basis

To provide you with information about our products and services, including purchase assistance schemes:

Our legitimate interests to provide you with information about our products or services that we think you may want or need, or that we think may be of interest to you.

To notify you about changes to our products and services:

Our legitimate interests to develop and manage our brand, products and services and to continue to provide you with information that we think you may want or need, or that we think may be of interest to you.

To provide you with information about new developments and house types which may meet your needs:

Our legitimate interests to develop and manage our brand, products and services and to continue to provide you with information that we think you may want or need, or that we think may be of interest to you.

To provide you with information about government purchase assistance schemes, such as Help to Buy, and government policies that relate to home ownership:

Our legitimate interests to provide you with information about products and services that we think you may want or need, or that we think may be of interest to you. There may also be a legal obligation for us to process the information.

To carry out marketing analysis about our products and services and your marketing requirements:

Our legitimate interests to ensure we are providing you with information about products and services that we think you may want or need, or that we think may be of interest to you.

To inform you of competitions and promotions we are running about our products and services:

Our legitimate interests to provide you with information about products and services that we think you may want or need, or that we think may be of interest to you.

To carry out market research:

Our legitimate interests to understand how we are performing. There may also be a legal obligation for us to process the information or to demonstrate that we are fulfilling our obligations.

To monitor telephone calls between us for authentication, security, quality and training purposes.

Our legitimate interests to help monitor our performance and to improve our products and services.

Capture CCTV footage for security, quality and training purposes.

Our legitimate interests around health and safety and crime prevention.

To process a complaint received from you:

Our legitimate interests to manage our relationship with you. We may also need to fulfil our legal and contractual duties.

To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit:

Our legitimate interests. Our legal obligations to comply with laws and regulations that apply to us.

To engage you to work for us as a sub-contractor:

To enable us to fulfil our contract with you. Our legitimate interests or legal duty to ensure that we fulfil our insurance, health and safety, HMRC obligations or to comply with laws and regulations that apply to us.

To allow you to work on or visit one of our construction sites:

Our legitimate interests to ensure we can act in your or our interests in the event of a health and safety incident. Our legal obligations to comply with laws and regulations that apply to us.

To consider you for employment with us:

Our legitimate interests to consider your suitability for employment opportunities with us.

Marketing

We will use your personal information to tell you about our products and services.

The personal information we have for you is made up of what you tell us and data we collect from third parties we work with. We use this to identify and inform us of

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 can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

It's a legitimate business interest for us to send you postal communications (from time to time) which may comprise information we think you may want or need, or that may be of interest to you. You can ask us to stop sending you marketing materials by contacting us at any time using the contact details above.

Before sending electronic marketing communications, we will follow the law and guidance which requires us to seek your consent. You can withdraw your consent at any time. Please just contact us using the contact details above or email our Data Protection Officer at compliance@watkinjones.com or follow the 'unsubscribe' instructions on our targeted marketing communications.

We may ask you to confirm or update your choices from time to time and if there are changes in the law, regulation, or the structure of our business.

We will never sell your personal data to third party organisations for marketing purposes.

Who we share your personal information with

Sometimes we need to share personal information we hold about you with other organisations that we work with or who provide services on our behalf. When sharing information, we will comply with all aspects of data protection law.

Where sharing is in our legitimate business interests, we may share your information without seeking your consent first. This may be with third parties providing services on our behalf. For example, one of our conveyancing solicitors or one of our panel of recommended independent financial advisers, or the mailing company who distributes our marketing materials; or property portals such as Zoopla or Rightmove to research lead generation.

We may also share information when required by law for example where ordered by the Court or to protect an individual from immediate harm.

We may also share your personal information if the structure of Watkin Jones changes in the future. We may choose to sell, transfer, or merge parts of our company, or our assets; or we may seek to acquire other companies or merge with them. During any such restructuring we may share your information with other parties. We'll only do this if those parties agree to keep your data safe and private.

Sending data outside of the EEA

We will only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions, or
- Comply with a legal duty.

If we do transfer information outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA.

How long we keep your personal information

We will keep your personal information for as long as:

- you remain an active prospect on our marketing database and/or we have products and services we believe are relevant or of interest to you.
- we have employment opportunities for which you are being considered.
- you are engaged to work with us as a sub-contractor or visit one of our construction sites.

After you stop being an active prospect or are no longer being considered for an employment opportunity, we may keep your information for up to 12 months for one of these reasons:

- To respond to any questions or complaints or to resolve any follow up issues between us.
- To show that we treated you fairly.
- To maintain records according to legal rules that apply to us.

We will keep your data for longer than 12 months if you have been engaged as a sub-contractor or have visited one of our construction sites, or in other instances, if we cannot delete it for legal, regulatory, technical or health and safety reasons. In this case we will make sure that your privacy is protected and only use it for those purposes.

We have a document retention schedule which sets out how long we keep different types of information for. This is based on legal requirements and best practice.

We will apply appropriate technical and organisational measures to ensure your personal information is secure.

We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so or where we have received a clear verbal instruction from you (as a one-off circumstance).

Your rights

Watkin Jones is committed to upholding your data privacy rights, which are listed below. If you wish to write to us regarding any of your rights, please contact our Data Protection Officer at compliance@watkinjones.com to request a copy of our Data Subject Rights Request Form ("DSRR form").

The right to be informed

We will be open and transparent about how and why we use your personal information. This will be set out in our privacy notices.

The right of access

You have a right to ask us what personal information we hold about you and to request a copy of your personal information. This is known as a 'subject access request' (SAR).

SARs need to be made in writing by completing a DSRR form and accompanied by proof of your address and identify. If someone is requesting information on your behalf they will need to provide us with your written consent for us to release your information and proof of ID (both yours and theirs). If you wish to submit a SAR, please return your completed DSRR form to our Data Protection Officer at compliance@watkinjones.com

If you are seeking to obtain specific information (e.g. about a particular matter or that relates to a specific time period), please clarify the details of what you would like to receive in your written request.

We will provide a copy of your information free of charge. However, we can charge a 'reasonable fee' if your request is manifestly unfounded or excessive, particularly if it is repetitive. Our fee will be based on administrative costs incurred by us in providing your information.

Where your request is manifestly unfounded or excessive we can refuse to respond. If we refuse to respond to your request, we will let you know why.

We have one month to provide you with the information you've requested (although we will try to provide this to you as promptly as possible). We may extend this period by a further two months if your request is complex or we have received a number of requests from you. If this is the case, we will inform you within one month of the receipt of your written request, explaining why an extension is necessary.

The right to rectification

You can ask us to rectify your personal data if it is inaccurate or incomplete by submitting a completed DSRR form to our Data Protection Officer at compliance@watkinjones.com. If you do, we will take reasonable steps to check its accuracy and correct it.

We will comply with your request free of charge. However, we can charge a 'reasonable fee' if your request is manifestly unfounded or excessive, particularly if it is repetitive. Our fee will be based on administrative cost incurred by us in complying with your request.

Where your request is manifestly unfounded or excessive we can refuse to comply with your request. If we refuse to comply with your request, we will let you know why.

We have one month to comply with your request (although we will try to do this as promptly as possible). We may extend this period by a further two months if your request is complex or we have received a number of requests from you. If this is the case, we will inform you within one month of the receipt of your written request, explaining why an extension is necessary.

Where we have shared the personal data in question to others, we will contact each recipient and inform them of the rectification of your personal data, unless this proves impossible or involves disproportionate effort.

Please help us to keep our records accurate by keeping us informed of any changes in your personal information.

The right to erasure

The right to erasure is also known as 'the right to be forgotten'. In some circumstances, you can ask us to delete or remove personal data where there is no compelling reason for its continued processing. This is not an absolute right, and we will need to consider the circumstances of any such request and balance this against our need to continue processing the data, for example, to comply with a legal obligation. Our response will also be guided by the provisions of our retention schedule. If you wish to submit a right to erasure request, please submit your completed DSRR form to our Data Protection Officer at compliance@watkinjones.com

We will comply with your request free of charge. However, we can charge a 'reasonable fee' if your request is manifestly unfounded or excessive, particularly if it is repetitive. Our fee will be based on administrative cost incurred by us in complying with your request.

Where your request is manifestly unfounded or excessive we can refuse to comply with your request. If we refuse to comply with your request, we will let you know why.

We have one month to comply with your request (although we will try to do this as promptly as possible). We may extend this period by a further two months if your request is complex or we have received a number of requests from you. If this is the case, we will inform you within one month of the receipt of your written request, explaining why an extension is necessary.

Where we have shared the personal data in question to others, we will contact each recipient and inform them of the erasure of your personal data, unless this proves impossible or involves disproportionate effort.

The right to restrict processing

In some circumstances you can ask us to restrict the use of your personal information. This is not an absolute right and only applies if:

- You disagree with the accuracy of your personal information
- It has been used unlawfully but you don't want us to delete it
- It's not relevant any more, but you want us to keep it for use in legal claims
- You have already asked us to stop using your data but you are waiting for us to tell you if we can keep on using it
- If we're processing your data on the grounds of legitimate interests (as detailed earlier), and whilst we consider whether our legitimate grounds override those of yours.

If you wish to submit a right to restrict processing request, please submit your completed DSRR form to our Data Protection Officer at compliance@watkinjones.com

We will comply with your request free of charge. However, we can charge a 'reasonable fee' if your request is manifestly unfounded or excessive, particularly if it is repetitive. Our fee will be based on administrative cost incurred by us in complying with your request.

Where your request is manifestly unfounded or excessive we can refuse to comply with your request. If we refuse to comply with your request, we will let you know why.

We have one month to comply with your request (although we will try to do this as promptly as possible). We may extend this period by a further two months if your request is complex or we have received a number of requests from you. If this is the case, we will inform you within one month of the receipt of your written request, explaining why an extension is necessary.

If we restrict the processing of your personal information, we are permitted to store the personal data but we won't use it.

Where we have shared the personal data in question to others, we will contact each recipient and inform them of the restriction of the personal data, unless this proves impossible or involves disproportionate effort.

The right to data portability

Data portability allows you to obtain and reuse your personal data for your own purposes across different services. You can ask us to move, copy or transfer your personal data from one IT environment to another by contacting us on the contact details above.

The right to data portability is not an absolute right and only applies:

- to personal information you have provided to us
- where our processing is based on your consent or for the performance of a contract
- when our processing is carried out by automated means.

If you wish to submit a right to data portability request, please submit your completed DSRR form to our Data Protection Officer at compliance@watkinjones.com

We will provide your information free of charge. If you request it, we will transmit your data directly to another organisation, but only if this is technically feasible. We are not required to adopt or maintain processing systems that are technically compatible with other organisations.

We have one month to comply with your request (although we will try to do this as promptly as possible). We may extend this period by a further two months if your request is complex or we have received a number of requests from you. If this is the case, we will inform you within one month of the receipt of your written request, explaining why an extension is necessary.

The right to object

You can object to our processing of your personal data where that processing is:

- Based on legitimate interests
- For direct marketing purposes (including profiling)

We will stop processing your personal data unless:

- we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or
- the processing is for the establishment, exercise or defence of legal claims.

If you object to our processing of your personal data for direct marketing purposes, we will immediately stop processing your personal data for that purpose.

To exercise your right to object, please submit your completed DSRR form to our Data Protection Officer at compliance@watkinjones.com.

Rights in relation to automated decision making and profiling

You can ask us to review any decisions that are determined by automated means (making a decision about you solely by automated means without any human involvement). You can also object to our use of your personal data for profiling (automated processing of personal data to evaluate certain things about you).

If you wish to submit a request in respect of your rights in relation to automated decision making and profiling, please submit your completed DSRR form to our Data Protection Officer at compliance@watkinjones.com.

How to complain

If you are unhappy with why or how we have used your personal information, please contact us using the contact details above.

Alternatively, if you want to raise a complaint about our processing of your data or would like to seek an independent view, you can contact the Information Commissioner using the following contact details:

Information Commissioner

Wycliffe House, Water Lane,
Wilmslow,
Cheshire SK9 5AF
Phone: 0303 123 1113
Website: www.ico.org.uk