

PRIVACY POLICY

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INTRODUCTION

City & Country is committed to keeping your information safe and respecting your privacy. We seek to handle your data fairly and legally at all times, whilst being transparent about the data we are collecting from you and how we may use such data.

The aim of this privacy policy is to:

- Let you know what personal information we collect, how we collect it, how we use it and who we may share it with
- Explain your rights in relation to your personal information
- Provide details on how to contact us regarding your data

WHO IS CITY & COUNTRY?

City & Country Group PLC & Subsidiaries are registered companies in England. Collectively referred to as City & Country (“we” or “us” or “our”) gather and process your personal information in line with this privacy notice and in accordance with UK data protection law.

WHAT INFORMATION DO WE COLLECT?

PERSONAL INFORMATION THAT YOU PROVIDE VOLUNTARILY AT DIFFERENT STAGES DURING THE BUYING PROCESS

- Contact information such as your name, postal address, telephone number, mobile phone number, and email address
- Details of the type of property that you are interested in purchasing, such as number of bedrooms, location and price range
- Details of your interest and when you are looking to buy
- Details of your financial circumstances such as current financial position, purchasing history, current buying position and status
- Details of your personal circumstances such as reason for buying, relationship status, life stage, age range and distance of move
- Details of your marketing preferences and whether you are happy to receive marketing communications via mail, email, SMS or third party
- If you decide to purchase, photographic ID will be collected in order to comply with money laundering legislation. A copy of your ID will be securely stored on our system until completion takes place, after which it will be permanently deleted

Without your provision to us of this information, you will still be able to use our website to view properties and learn more about City & Country. However, without some of this information you will be unable to make an enquiry or download a brochure. This information is required so that we can communicate with you and tailor our services to your property requirements.

COOKIES AND PERSONAL INFORMATION THAT IS COLLECTED AUTOMATICALLY

Cookies are small text files that are stored in your browser when you visit and use our website. These cookies are used for a variety of reasons:

- 'Strictly Necessary Cookies': these cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.
- 'Performance Cookies': these cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.
- 'Functionality Cookies': these cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.
- 'Targeting Cookies': these cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store personal information directly, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

For further information about the cookies we use and how to disable them please visit - www.cityandcountry.co.uk/cookies

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

PERSONAL INFORMATION PROVIDED BY YOU

The main method of collecting personal information is when it is provided to us by you. Your information may be captured in several ways, when you:

- Submit an enquiry or download a brochure via our website
- You call or visit a sales suite and speak to one of Sales Executives. Please note, phone calls are recorded for training and quality monitoring purposes.
- Attend an event or respond to any marketing material

- We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them

PERSONAL INFORMATION PROVIDED BY THIRD PARTIES

We work with a number of third parties and on occasion we may receive personal information about you from these companies. Such companies may include estate agents, online property portals such as Rightmove or Zoopla and social networks, where you have completed a form or responded to an advert and given them permission to pass your details on to us. We may also receive information from your solicitor, should you purchase a property from us.

PERSONAL INFORMATION COLLECTED FOR THE PURPOSE OF MARKETING ANALYTICS

We use third party software services including Google Analytics and Infinity call tracking for the purpose of analysing where our leads come from. Although these services are driven by personal information, the data captured is anonymised where possible and is not used for any direct marketing purposes or shared with any other parties.

WHY WE USE YOUR PERSONAL INFORMATION

Most commonly, we will use your information for the following purposes:

GENERAL COMMUNICATION

We will use the information you have provided to communicate with you in relation to your enquiry and provide details of any properties you are interested in. We may also use your information to make recommendations on alternative properties or services that might be of interest to you.

If you decide to purchase from us, we will use your information to contact you regarding the progression of your purchase and to carry out our obligations arising from any contract entered into between you and us.

DIRECT MARKETING

Where you have actively opted in and given consent for us to send you marketing material, we may send you information about new properties, property developments or services which might be of interest to you. We will only send this information to you through your preferred method of contact. You can change your preferred method of contact or unsubscribe from receiving direct marketing material at any time by emailing gdpr@cityandcountry.co.uk

If you choose to unsubscribe from receiving marketing material, we may anonymise your personal information and use it to analyse visitor information and profiles, this will be anonymous, and we will be unable to connect your personal data to your visitor information.

ADDITIONAL PURPOSES

In addition to the above we may use your information:

- To report, analyse and improve City & Country's products and services

- For general business administration
- To comply with any legal, contractual or regulatory obligations

WHAT ARE THE LEGAL GROUNDS FOR CITY & COUNTRY USING YOUR INFORMATION?

Depending on why your information is being used, City & Country has the following legal grounds for using your information:

- You have given consent for your information to be stored and processed for one or more specific purposes
- The processing of your information is necessary for the performance of a contract e.g. you are purchasing a property from City & Country
- The processing of your information is necessary for compliance with any legal obligations
- The processing is necessary to pursue City & Country's legitimate interests or those of any third party that receives your information, except when these are overridden by your fundamental rights and freedoms

The only exception to the above is when we send direct marketing materials, which we will only do with your consent.

WHO WILL WE SHARE YOUR PERSONAL INFORMATION WITH?

We will not share or disclose any of your personal information without your consent, other than for the purposes set out in this policy or where there is a legal requirement to do so.

We may share your information with trusted third parties such as estate agencies and other companies which are providing a service to either City & Country or directly to you on our behalf.

We may also share your information with law enforcement and regulatory agencies.

HOW WILL WE KEEP YOUR INFORMATION SAFE?

The Company takes the security of personal data seriously and we have implemented and maintain safeguards which are appropriate to the size and scope of our business, the amount of personal data that we hold and any identified risks. This includes encryption and pseudonymisation of personal data where appropriate. We have also taken steps to ensure the ongoing confidentiality, integrity, availability and resilience of our processing systems and services and to ensure that, in the event of a physical or technical incident, availability and access to personal data can be restored in a timely manner. We regularly test and evaluate the effectiveness of our technical and organisational safeguards to ensure the security of your data.

HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION FOR?

City & Country will only keep your personal data for as long as it is required. If you have registered your interest in a development and do not buy, your data will be kept on our database for a period of time after the final property completion on the site. If there are other

developments local to you that may be of interest you will be invited to register for these as you wish.

If you have purchased a property from City & Country, this is a legitimate interest and therefore we will hold your data for as long as required by the business.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

Subject to certain legal conditions, you have a number of statutory rights in relation to your personal data:

- You have the right to request access to your personal information
- The right to correct any inaccurate or incomplete personal information we hold about you
- The right to request for your information to be deleted or removed from our records if there is no reason for it to be kept
- The right to restrict the processing of your personal information
- The right to object to the processing of your personal information
- The right to request the transfer of your personal information in a portable secure format

If we feel that your request for information is excessive or manifestly unfounded we may ask for a reasonable fee for the administrative costs associated with the request.

CHANGES AND UPDATES TO THIS PRIVACY POLICY

City & Country will review this policy at regular intervals and reserves the right to update or amend it at any time and from time to time.

It is intended that this policy is fully compliant with the General Data Protection Regulation at the time of writing. However, if any conflict arises between the data protection legislation and this policy, the company will comply with the data protection legislation.

FURTHER DETAILS AND QUESTIONS

If you wish to contact us and know more about your information, make corrections to your data or exercise any of your rights in relation to data protection, please contact via one of the following methods:

Email: gdpr@cityandcountry.co.uk

Postal: GDPR, City & Country, Bentfield Place, Bentfield Road, Stansted, Essex, CM24 8HL

We will aim to respond to you as soon as possible but any request for personal information may take between 1 - 3 months depending on the complexity of the request. This time frame is the required timeframe suggested by the Information Commissioner's Office.