APARTMENT
GROUP

PRIVACY POLICY

Apartment Group ("We") are committed to protecting and respecting your privacy.

This policy and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our website or any of our social media channels you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulations (the GDPR), the data controller is Apartment Group Ltd, First Floor, Two, Jesmond Three Sixty, Jesmond, Newcastle upon Tyne, NE2 1DB who can be contacted using the following contact details officemanager@apartment-group.com.

For any issues relating to this policy. Please contact us initially via the email address officemanager@apartment-group.com.

INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

- Information you give us. This is information about you that you give us by filling in forms on our site, visiting our premises, visiting our social media platforms or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our WiFi, place a booking on our site and when you report a problem with our site. The information you give us may include your name, address, e-mail address, date of birth and phone number, financial and credit card information, personal description, video footage and photograph.

- Information we collect about you. With regard to each of your visits to our site we will automatically collect the following information:
    - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
    - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products and pages you viewed or searched for' page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number.
    - Information we receive from other sources. This is information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this site. We will also have told you for what purpose we will share and combine your data. We are working closely with third parties (including, for example, business partners, sub-contractors

- in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

We do not collect any special categories of personal information. 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 do we collect any information about criminal convictions and offences.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

USES MADE OF THE INFORMATION

The lawful basis we rely on to process your information is Legitimate Interest unless in certain cases where legal obligation applies or where we have your freely given consent. We use information held about you in the following ways:

- Information you give to us.
  - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
  - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have specifically consented to this;
  - to comply with legal and regulatory requirements
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.

If we are not able to process your personal data whether because you do not consent, you withdraw or limit consent, or for any other reason then we will not be able to achieve the purposes listed above.

DISCLOSURE OF YOUR INFORMATION

You agree that we have the right to share your personal information with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its
- subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Selected third parties including:
    - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
    - advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
    - analytics and search engine providers that assist us in the improvement and optimisation of our site;
    - credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Apartment Group or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of Apartment Group our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. In transferring your data outside the EEA we rely on E.U. – U.S. Privacy Shield & Safe Harbor Privacy Principles.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

RETENTION OF DATA

Your data is retained and cleansed in accordance with our Data Cleansing Policy which can be obtained by contacting our Data Protection Officer via officemanager@apartment-group.com

YOUR RIGHTS

We will only process your data for marketing purposes where you have either given consent to us to do so or where there is a legitimate interest for us to do so. The legitimate interests that we will rely on are as listed above under "Uses made of the Information".
We will only rely on legitimate interest as a grounds for processing your data where we have completed a Legitimate Interest Assessment and where such assessment supports the use of such data processing.
We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

At any time, even if you have previously consented, you have the right to ask us not to process your personal data for marketing purposes and/or not to disclose it to third parties for marketing purposes. You can do this by contacting us using the following email address: officemanager@apartment-group.com

You can also use this email address to notify us of any preferences you have in relation to the processing of your data for example as to the frequency of communications that you receive from us or the manner or the subject matter of such communications.

The GDPR also gives you the following rights:

1. to access information held about you;
2. to request the deletion or correction of information held about you;
3. to object to or restrict the processing of information about you;
4. to request that information about you be transferred to another person;
5. to complain to the relevant supervisory authority.

You can exercise rights 1-4 by contacting us using the following contact details: officemanager@apartment-group.com

We may request specific information from you to help us confirm your identity (such as photographic identification and a recent Utility bill) to ensure your right to access specific personal data (or to exercise any of your other rights) is correct. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. Personal data will not be transmitted via email as part of our commitment to ensuring your safety.

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.

To exercise right **5. to complain to the relevant supervisory authority.** In the UK this is the Information Commissioner's Office (ICO) https://ico.org.uk/ whose contact details are as follows:
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire , SK9 5AF.

THIRD PARTY SITES

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

COMPLAINTS PROCEDURE

If you have any complaints in relation to how our business has processed your data or in relation to the exercise of your rights as detailed above you can in the first instance raise your concerns by contacting us as follows: Office Manager - Apartment Group, First Floor, Two Jesmond Three Sixty, Jesmond, Newcastle upon Tyne, NE2 1DB

You may also contact the Information Commissioner's Office in relation to any such complaints

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: Office Manager - Apartment Group, First Floor, Two Jesmond Three Sixty, Jesmond, Newcastle upon Tyne, NE2 1DB

EMAIL: INFO@APARTMENT-GROUP.COM

TELEPHONE: 0191 232 1341